



Marine Renewables Industry Association

*Draft Offshore Renewable Energy Development
Plan (OREDPA)*

Response by MRIA

To Public Consultation

May 2011

One of our greatest national challenges is to convert our natural resource in Ocean Energy- a resource which is free and never-ending- into jobs and income, particularly as doing so will give our island home energy security in an uncertain world and provide a huge boost to jobs and income. The SQW Report, jointly commissioned by the Governments in the Republic of Ireland and in Northern Ireland, on the potential economic impact of Ocean Energy has identified 'sound quantitative evidence that an island of Ireland Ocean Energy sectorcould produce a total Net Present Value of around €9 billion and many thousands of jobs..'

Almost uniquely in our island's economic development experience, Ireland has serious advantages in Ocean Energy including a world-beating wave resource, excellent research and development facilities, leading device developers, etc. However, despite the work of a number of dedicated public servants in the relevant Departments and agencies, the Republic of Ireland has lacked ambition and cross-Departmental determination in this area which promises so much in terms of job creation. The relatively minor environmental impact of Ocean Energy, both in terms of potential carbon emission reduction and in terms of the local environmental impact of wave and tidal developments, is another positive aspect to this industry.

The final Ocean Renewable Energy Development Plan must be the key foundation stone in the development of Ocean Energy in Ireland and must be marked by clear, deliberate and accountable actions for delivery, particularly during the next five years. Vision and commitment are needed to realise the huge jobs and income creation potential of Ocean Energy

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Executive Summary

Ireland has the world's premier wave resource as well as a notable tidal resource which together have the potential to support a major Ocean Energy industry with an associated major uplift in jobs and income. The Draft Ocean Energy Development Plan (OREDP) is an early step in the direction of a plan to support the Republic of Ireland's strategy to develop Ocean Energy and to achieve its targets, notably the provision of 500MW of wave and tidal generating capacity to be in operation by 2020.

The economic impact of Ocean Energy could be enormous- an independent expert study¹ suggests that Ocean Energy development could lead to €9bn in extra income and thousands of new jobs. We have the potential to be major players on the world stage because of the scale of our resource, our globally known device developers, outstanding research and development facilities and our entrepreneurial tradition. The opportunity could manifest itself on three planes: *Enterprise*- the development of a supply chain to support Ocean Energy and, indeed, Offshore Wind Energy in Ireland and the UK; *Energy Security*-Ocean Energy could make Ireland (traditionally one of the most energy-import dependent EU countries) self-sufficient in a world of uncertain carbon fuel supply and prices; and *Electricity Export*- Ocean Energy may give the opportunity to export renewable energy to the UK and beyond via interconnectors - exporting is key to tapping in to the huge job creation potential of this industry

Realising these opportunities requires firm actions and ambition over the next five years, in particular by relevant Government bodies, with deadlines and clear accountability. The MRIA recommends that the final OREDP incorporates a clear statement of intent to tackle seven issues during the period to 2015:

1. commissioning a study on the *Economics of Exporting Electricity*;
2. strengthening the Ocean Energy Development Unit;
3. underpinning the key '500MW by 2020' target;
4. introduction of a new foreshore consenting scheme;
5. preparing and executing an initial leasing round;
6. planning for Grid connections;
7. supporting the *westwave* project.

¹ *Economic Study for Ocean Energy Development in Ireland* SQW, 2010

1. Introduction

The Marine Renewables Industry Association (MRIA) represents all of the main interests on the island of Ireland engaged in the wave and tidal sector ('Ocean Energy') of marine renewables energy (Ocean Energy plus Offshore Wind).

The Association includes firms engaged in device development and manufacture (e.g. Wavebob, Ocean Energy, Open Hydro, Aquamarine Power and others), utilities and site developers (e.g. ESBI, SSE Renewables, Bord Gais and Tonn Energy/Vattenfall), professional firms and consultants (e.g. Arup, Arthur Cox, Solicitors), research and development businesses (e.g. Pure Marine), supply chain activities (e.g. Siemens, Harland and Wolff Heavy Industries, Lotusworks, B9 Energy, Port of Cork) and academic researchers. The Association is an all-Island body. For further details, please refer to the MRJA Website www.mria.ie.

2. First Step

The Draft Ocean Renewable Energy Development Plan (OREDP), and the related Strategic Environmental Assessment (SEA) and the Natura Impact Statement, is a first step towards creating a plan which is the logical next stage in realising the Ocean Energy targets set out in the Republic of Ireland's strategy for the industry- notably the target to achieve 500MW of wave and tidal capacity in operation by 2020

The effort, represented by the Draft OREDP, to build this plan sits alongside other positive work in recent years including the White Paper '*Delivering a Sustainable Energy Future for Ireland*'; the establishment of the Ocean Energy Development Unit within Sustainable Energy Authority of Ireland (SEAI); the work in progress within the Department of Environment, Community and Local Government(DECLG) which should result in the announcement soon of a new marine consenting system (i.e. arrangements for marine renewables promoters to explore and, separately, to lease segments of the foreshore); participation in international Grid ventures such as the *ISLES Infrastructure Project* which are vital to future efforts to export electricity from Ireland; the provision of funding support both for research and development by marine renewables companies and for research infrastructure such as the Atlantic Marine Energy Test Site (AMETS) off County Mayo and the MERC facilities in Cork; and the strategic approach to transmission planning.

3. MRIA's Concerns

The Association welcomes the Public Consultation on the Draft OREDP. It should enable issues to emerge and be addressed in the final OREDP to allow Ireland to grasp the Ocean Energy opportunity.

The MRIA, nonetheless, is deeply disappointed at the lack of a clear pathway, targets and deadlines (particularly for the near-term) within the draft 'Plan' to realise Ireland's unique opportunity in Ocean Energy- the opportunity to build on an abundant natural resource and capture €9bn in added value and thousands of new jobs-see 4. below. The Association believes that with a little more vision and commitment, similar to that shown by the Scottish Government, Ireland inter alia could become an exporter of power and our maritime energy resources could become the source of massive job creation.

Furthermore, the Draft Plan is of concern to the Association because it fails to highlight the target set by Government (most recently in the *National Renewable Energy Action Plan*) to reach a total of 500MW of wave and tidal generating capacity in operation by 2020 -the target is in the Draft OREDP but in a low key fashion and set within a 2030 framework and deadline. The 2020 target has been critical to date in mobilizing both the private and the public sectors to develop Ocean Energy in Ireland. Failure to underpin the original '500MW by 2020' target, and to do so with a practical Plan, risks losing the vital income and jobs potential of the sector as identified by SQW- see 4. below.

This Response by MRIA builds on these points. Summary responses to the 'Questions for Consideration during the Public Consultation' are given at 6 below while the Appendices include a comment on the Natura Impact Statement.

4. MRIA's View of Irish Ocean Energy Opportunity

4.1 Economic Impact

Ireland is going through a period of serious economic difficulty with consequent loss of employment and income throughout all communities on the island. Ocean Energy- energy derived from waves and tides- has the potential to make a significant jobs and income creation impact over time whilst making a very real economic impact today in the areas of research and development and project development. A study commissioned

by SEAI and Invest Northern Ireland on the potential economic impact of Ocean Energy (*Economic Study for Ocean Energy Development in Ireland* SQW, 2010) states that:

There is currently sound quantitative evidence that by 2030 a fully developed island of Ireland OE sector providing a home market and feeding a global market for Renewable Energy could produce a total Net Present Value (NPV) of around €9billion and many thousands of jobsIt is possible that an island of Ireland wave energy industry meeting the 500MW 2020 target could produce at least 1,431 additional FTE jobs and an NPV of €0.25bn, increasing to 17,000-52,000 jobs and an NPV of around €4-10bn by 2030.....Similarly a tidal industry providing 200MW of capacity by 2020 may deliver around 600 FTE jobs and an NPV of €111m, increasing to 8,500-17,000 jobs and an NPV of between 1.5-2.75bn by 2030

-SQW Executive Summary

The national challenge is to convert our natural resource in Ocean Energy into jobs and income particularly as doing so will give energy security in an uncertain world. The final OREDP will be the key foundation stone in this effort and must be marked by clear, deliberate and accountable actions for delivery particularly in the next five years, the period until the first planned review of the OREDP.

4.2 Potential of Irish Ocean Energy

The benefits of *Onshore Wind* have already been won elsewhere, notably in Denmark which generates a significant proportion of its GNP and significant job numbers from Onshore Wind. *Offshore Wind* in Europe is emerging as the domain of a few countries, notably Germany, but there is still enormous scope for the development of a supply chain (e.g. shipping, operations & maintenance-o&m) to support this infant industry off both the British and, later, Irish coasts. *RenewableUK*, in a recent study, found that growth in marine renewables was the key driver in the doubling of employment in UK renewable energy in the past two years. If Ireland adopts a 'wait and see' attitude towards Ocean Energy (where we have natural advantages), then we will end up with another wind industry (where our natural advantages are more limited) where relatively few Irish jobs are created and which uses foreign originating products and services.

In Ocean Energy, Ireland has the potential to become a major player because of

- Our unique level and quality of resource
- Our leading Ocean Energy device companies- Wavebob, Ocean Energy, Open Hydro, etc -are among the leading firms in the world in this field
- Our outstanding educational and research and development facilities e.g. MERC in Cork, the test facility in Galway Bay and the new AMETS off Mayo, the expertise at Queens University, Belfast and others
- Our entrepreneurial tradition which has responded effectively to other opportunities to create new sectors in the past n.b. software

The opportunity in Irish Ocean Energy has three elements- ENTERPRISE, ENERGY SECURITY and ELECTRICITY EXPORT.

4.3 Enterprise

The ENTERPRISE element ranges from research and development and device manufacture to operations and maintenance, finance and legal support. The 'supply chain' faces an immediate opportunity in Offshore Wind in the UK- 47GW of Offshore Wind capacity is either in operation or, for the most part, at the development stage at present, representing over six times the total electricity generating capacity on the island of Ireland! This prospect will both give early job and income benefits to Ireland and will also build companies, their experience and their skills to capitalise on the forthcoming wave and tidal opportunity. The UK promise needs to be promoted by the development agencies in the Republic. It is notable that recent briefings by the Crown Estate in Northern Ireland attracted over 300 companies.

Despite having access to what is arguably a more limited resource, Scotland is carving out a reputation as the 'go to' country in Ocean Energy and has attracted global investors such as ABB, Rolls Royce, E.ON, Vattenfall and others to commit multi million Euro investment to technology and project investment. It is by no means too late for the Republic of Ireland, with its natural advantages, to establish a leadership position in Ocean Energy and the OREDP must be geared to this ambition. Incidentally, Northern Ireland has made remarkable strides in promoting and developing its limited Ocean

Energy resource and is ahead of the Republic in terms of OREDP, consenting and initial leasing round.

4.4 Energy Security

Our Ocean Energy resource alone could meet all of our electricity needs many times over and when combined with wind (which operates to a different pattern of intermittency to wave) will go a long way to provide us with a balanced and secure portfolio of energy inputs. ENERGY SECURITY, as the Economic and Social Research Institute (ESRI) points out in *'Aspects of Irish Energy Policy'* (2005), is a high priority:

'Ensuring a secure energy supply for the foreseeable future is of crucial importance for the health and economic welfare of the country.....by 2010 the bulk of electricity generation will depend on gas. This means that any physical disruption of energy supply could have very serious consequences.....major price shocks (to energy supplies) could have serious economic consequences'

4.5 Exporting Electricity

All of the stakeholders in Ocean Energy accept that the enormous scale of the resource in Wave potentially represents a huge opportunity for ELECTRICITY EXPORT via Grid Interconnectors.

The drivers for export include

- EU targets for reductions in carbon emissions and for renewable energy may not be achievable (e.g. because of lack of renewable resources) by all Member States so that there may be opportunities for Ireland to make deals with other Members to provide for their targets through the export of Irish electricity derived from renewables.
- The UK must make an enormous investment (£110bn + by 2020) in its electricity generation capacity to replace worn out plant, to provide for growth in demand and to meet renewable energy targets. It must do so in the face of Government policy which shows limited enthusiasm for further nuclear investment (a trend which is likely to be strengthened in light of the recent events in Japan)...and this policy requires c30% of electricity from renewable sources by 2020. Indeed, the EU mandated *'National Renewable Energy Action Plan for the United Kingdom'* implies the need for electricity imports and points out that the UK has a target of

15% of its energy consumption from Renewables by 2020- this compares to 1.5% in 2005 with only a small increase since. This may become a major opportunity for Ireland, particularly as the UK Government is reviewing its renewables targets with a view to *upward* revision.

- The likely emergence of an EU Energy Market with market structures established and run at European level with a bias towards renewables. In those circumstances, it is possible that Member States may contribute to the overall network on the basis of their natural advantage e.g. Ireland and Scotland focus on the provision of Ocean Energy, Spain and Portugal on Solar Energy and so on.
- The development of Ocean Energy technology and its large scale deployment will drive the cost of Ocean Energy down as 'economies of scale' and the 'learning curve' effects kick in. Retention of the REFIT incentive for Ocean Energy is vital as it is key to early projects and will cost relatively little compared to the potential job and income returns. Its abolition would give a very strong and negative message to international investors that Ireland is closed de facto to Ocean Energy.

The UK's joint Government and Industry Offshore Valuation Group '*The offshore valuation: a valuation of the UK's offshore renewable energy resource*' points out that by harnessing 29% (including wind) of the practical offshore resource by 2050

..145,000 new UK jobs could be created by industry...integration with neighbouring electricity networks through a 'super-grid' could provide access to a single European electricity market, enabling the UK to sell electricity across the continent

The UK's open ambition to create jobs and exports in Ocean Energy is built on an offshore resource that in its totality is in the same league as that of Ireland. *The challenge for Ireland in Ocean Energy is principally one of ambition and commitment.*

We laud the involvement of Ireland in the various international initiatives to develop European interconnectors. Since there is good reason to believe that Ireland can realise substantial value from exported Ocean Energy, Ireland is long overdue in performing a study to quantify this value. Exporting Ocean Energy would make the interconnectors work for Ireland rather than act as an expensive conduit for imports Ireland can still gain a leadership position in this industry where we have so many advantages- see 4.2

above- but this requires an OREDP with firm and attributable targets backed up by an ambitious, cross-Departmental effort by Government to implement the Plan.

5. Critical Actions

A strong, final version of the OREDP is vital in terms of setting out a development map for all of the stakeholders in Irish Ocean Energy and to give a strong signal of Government ambition and support to realise the jobs and income potential of the sector. It must play a key part in changing perceptions and show that the Government is committed to practical actions to give effect to its strategy for Ocean Energy. The scope for the creation of significant new job opportunities in Ocean Energy turns on the OREDP.

To provide a strong signal that the Ocean Energy strategy is being implemented by the final OREDP, the MRIA recommends that the final document includes a statement of critical time-bound actions which may be grouped under two headings- *Presentation and Communication* and *Practical Support Actions*.

5.1 Presentation and Communication Actions

There is an urgent need to present Ireland at home and abroad as ‘open for business’ (and easy to do business with) in Ocean Energy. Key to this is the ‘one stop shop’ model already employed (via IDA) in attracting ‘foreign direct investment’ with great success and now being used also to promote Scotland in Ocean Energy (‘Marine Scotland’).

Strengthen OEDU: MRIA recommends that the resources of the Ocean Energy Development Unit (OEDU) be increased and strengthened so that it can effectively:

- Act as a point of contact and onward reference for all potential interests, notably promoters and investors on both the Enterprise and the Energy planes
- Act as an ‘expeditor’ within the Government system for Ocean Energy similar to the role played by *Marine Scotland*
- Communicate the Irish opportunity at home and abroad with support and engagement from Enterprise Ireland and IDA.
- Champion, drive and, generally, act as a key delivery agent for the OREDP

A real increase in resources is needed to enable the OEDU to fulfil the above role. Equally importantly, it will need significant ‘buy in’ by the many Departments and

Agencies associated with Ocean Energy. The OEDU Advisory Group should be given strong terms of reference so that it can 'drive' the OREDP. The Department of Enterprise, Trade and Employment should be directly represented, for the first time, on the new body at a senior level.

To be clear, we are not suggesting changes in the overall institutional framework at present, merely more effective methods of inter- Departmental working and involvement with external stakeholders.

Support 500 MW target: The national target of 500MW of wave and tidal capacity in operation by 2020 must be retained and should be highlighted in the Plan. Progress against the job and income opportunities highlighted in the SQW Report should be monitored and reported on in the period from 2015 onwards as the industry starts to achieve technology maturity- the industry is steadily advancing on a technical level and as Appendix 1 shows, the Wind precedent indicates that progress may surpass forecasts. In addition, the 2030 'High Scenario' level of 1500MW for Ocean Energy in the Draft OREDP should be adopted as the *minimum* 2030 target inter alia as a means of galvanising the national effort in Ocean Energy.

5.2 Practical Support Actions

Schedule publication of consenting scheme: the Plan should set a firm date for the publication of the proposed new consenting regime and allow for a period of consultation on what will be both a complex and a vital piece of future governance. The MRIA has had a constructive dialogue to date with the Department of Environment, Community and Local Government on this key issue of consenting¹.

Prepare and execute an initial leasing round: The Plan should state the intention of all concerned to pursue with urgency the work required to enable an initial leasing round (this may include marine spatial planning) to take place in 2012. Note that Northern Ireland has publicly announced its intention to *complete* its initial leasing round in the spring of 2012 while Scotland has already concluded its equivalent exercise (in 2010) and now has a rolling programme with new rounds opening every six months.

¹ Also, see the Association's White Paper *Foreshore Licensing and Leasing for Marine Renewables Projects*, published in August 2009.

Consenting and leasing round dates have been sought for many years and have now become urgent.

Commence planning for Grid connections: the provision of Grid connections is, of course, a core component of the Ocean Energy challenge. Grid is complex, expensive and new capacity cannot be provided quickly. To realise the huge opportunity to realise new jobs involved in Ocean Energy, Ireland needs appropriate connections to the Grid for Ocean Energy so that it may contribute to the provision of a balanced and secure portfolio at home of energy sources and give access to export markets via interconnectors.

In particular, the Plan should address the need to provide Grid access to enable the 2020 target of 500MW in marine renewables capacity to become operational. The Association has set out its view on the priorities in this area in its White Paper *Initial Development Zones to Focus on Realizing Ireland's Ocean Energy Potential*, published in August 2010. The planning of Grid connections- a lengthy and complex process- should proceed in line with the other actions e.g. consenting, leasing round, etc. The Association has been in dialogue with Eirgrid and other relevant agencies in this matter.

Commission study on economics of export: the OREDP should be explicit about the Government's export ambitions and its aspirations with international partners to develop an offshore, export oriented Grid network as part of a European initiative.

Ireland has the potential to export huge amounts of electricity arising from our unique natural advantage in wave derived energy in particular. Undoubtedly, some of the output of future wave energy farms will be required for national consumption for reasons of portfolio-balancing, security of supply, etc.

However, the bulk of the potential output must be exported. MRIA recommends that an independent review of the economics of exporting electricity from Ireland be incorporated as an urgent action item in the final Plan.

Support westwave: the NER ('New Entrant Reserve') 300 Scheme promoted by the EU provides a unique opportunity to trial and to showcase Irish Ocean Energy. The westwave project is promoted principally by ESBI but supported by many other organizations, including MRIA, through Associate Memberships. MRIA suggest that the Government should *now* identify marine renewables as *the* Irish priority area under NER 300.

6. Response to Specific Questions in Draft OREDP

General observations: All of the indicators from the Draft OREDP and its associated reports suggest that wave energy developments have relatively minor environmental risks while the experience inter alia with the tidal device at work in Strangford Lough in Northern Ireland indicates that tidal developments too can be environmentally quite benign. Second, the Association is concerned that the project level mitigations proposed do not distinguish clearly between those mitigations appropriate for wind v tidal or wave projects

1. Do you think that the recommended actions in Chapter 10 are appropriate and achievable?

The MRIA believes that the actions should be strengthened and enhanced through the adoption of the 'Actions' set out at 5.1 and 5.2 above.

In addition, MRIA recommends that the proposed Action 5 should change from 'Future foreshore consenting processes should take into account the broad findings and assessment of this SEA and AA in terms of location and constraints' to 'Preparation of locational guidance as part of the preparation of future marine plans for specific development areas'

2. What are your views on the 'deploy and monitor' approach (see Appendix 3)?

The Association agrees with the 'deploy and monitor' approach which would facilitate a consenting process which takes account of the scale of the development, environmental sensitivity and technology- type risk (i.e. whether the project is wave, wind or tidal related).

MRIA advocates that the following points should be taken into account

- 'Deploy and monitor' is particularly valuable in regard to small scale developments which have a particular role to play in filling knowledge gaps at this early stage of the industry's technology development. A 'deploy and monitor approach' should permit small developments to proceed expeditiously through the consenting process with monitoring measures agreed between the regulator and the developer at an early stage.
- A device may be deployed and later removed at the behest of the regulator on the grounds of an alleged negative environmental impact. The MRIA

recommends that an appeal mechanism for developers to deal with such situations should be provided for.

- There is potential in the ‘deploy and monitor’ approach to burden developers, particularly of the early small scale developments who will face considerable uncertainty over the environmental impact of wave and tidal devices, with significant cost and, also, logistical complexity. This must be borne in mind and excessive requirements guarded against.
- The burden of providing baseline environmental information should be borne by the State and not solely by developers. Where developers are tasked with providing such information, a data sharing model should be promoted and encouraged by the relevant Government Department/consenting body. This will prevent duplication of effort in terms of survey work, etc
- One of the reasons for proceeding quickly with an initial leasing round- which is likely to feature a number of small scale developments- is that it will generate the opportunity to learn about the environmental effects of various types of devices and ways and means of mitigating these as necessary.
- Clear guidelines for ‘deploy and monitor’ are needed and these should be developed with an input from industry. The MRIA stands ready to provide technical expertise and views for such a consultation.

3. Table 7 provides a high level strategic overview of the level of development that the assessment has shown is possible for the various technologies without significant adverse effects on the environment in the different resource assessment areas. What are your views on the levels of potential development identified?

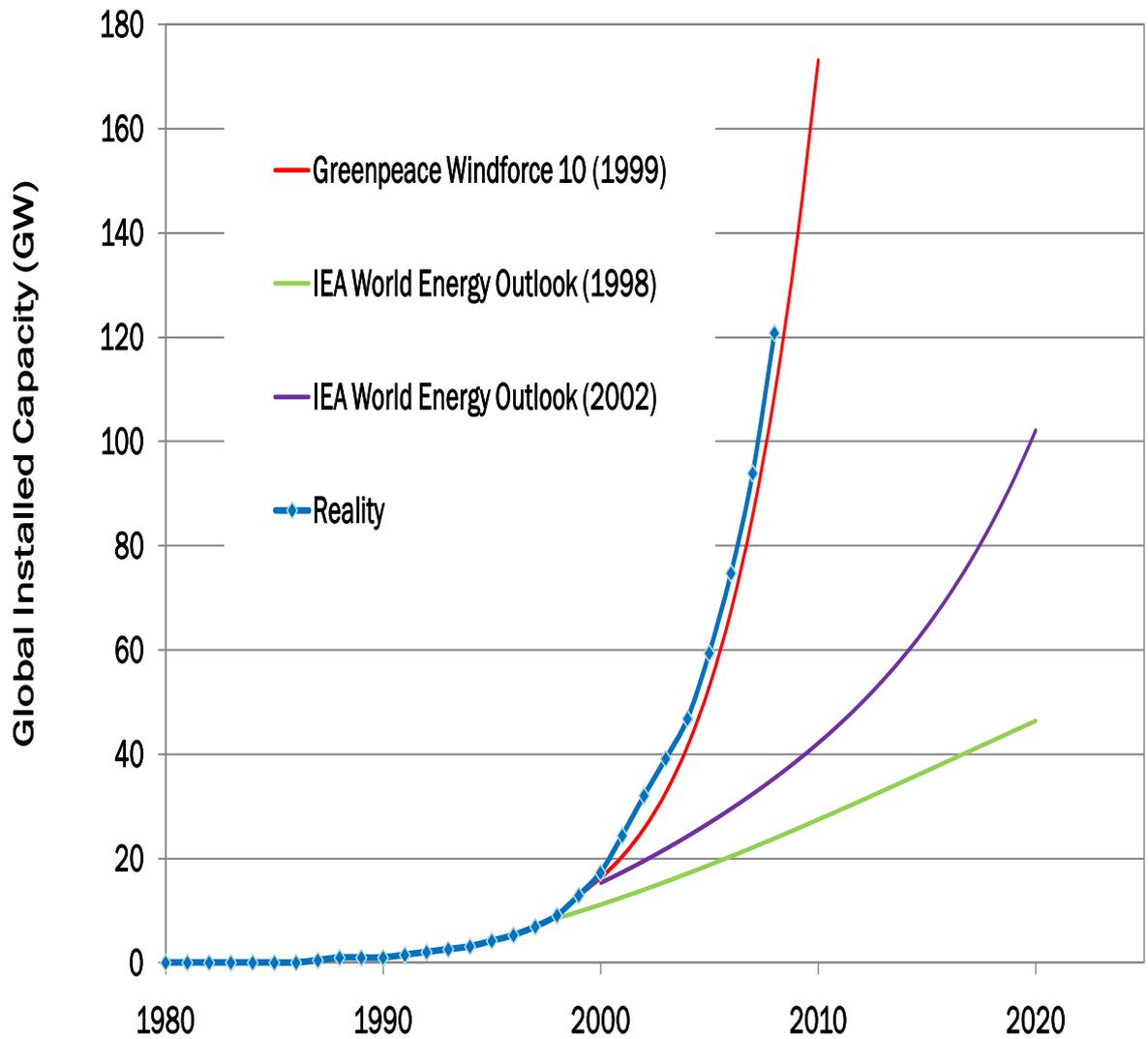
A key point here is the need to proclaim and clearly support the ‘500MW by 2020’ target contained in the Government’s Strategy for Ocean Energy. The case for highlighting this target is set out in the main body of this Response.

Moreover, the Draft OREDP lacks ambition and this could impact negatively on the perceptions and investment intentions of investors in the industry. Ocean Energy technology is at the development stage. It is likely that small scale developments could be deployed c2015 and, given that the technology matures, commercial scale

developments should begin to be deployed before 2020. It is not unreasonable to assume, therefore, that Ocean Energy off the Irish coast could take off in the 2020's in light of technology maturity and the abundant resource (e.g. see Table 7 of the Draft OREDP). The 'High Scenario' presented in the Draft OREDP provides for 1500MW of wave and tidal by 2030. Although there are, of course, Grid, environmental and commercial considerations to be taken into account, the 1500MW *aspiration* nonetheless could be interpreted as a further signal of modest ambition and could act as an artificial dampener on the planning and development of the industry. MRIA recommends that this be set as the minimum *target* for 2030 to be achieved in an environmentally, socially and economically sustainable manner.

'Reality beats Forecast'

source- Aquamarine Power



Appendix 2: Draft OREDP 'Recommended Actions'

Collaboration and Coordination:

- **Action 1:** Development of a mechanism for greater coordination between all state bodies concerned to improve the effectiveness of the delivery of the OREDP as policy develops. This could include an enhanced role for the existing multi-body Ocean Energy Steering Committee.
- **Action 2:** Collaborative working with the existing Ocean Energy Advisory Group to assist/ advise SEAI and DCENR with taking forward the OREDP

SEA Monitoring Requirements:

- **Action 3:** In accordance with Article 17 of the SEA Regulations 2004, the group identified in the mechanism for advanced co-ordination in Action 1 shall ensure that unforeseen adverse effects are identified at an early stage and that appropriate remedial action is taken as required.

Addressing Data, Information and Knowledge Gaps:

- **Action 4:** DCENR and SEAI, in the context of the offshore renewable energy sector, should collaborate with the lead authorities on the MSFD and other statutory requirements that are taking forward requirements relating to collation, management and dissemination of data and information collected for the marine environment so that data is made publicly available so that it may be taken into account by those developers and bodies involved in the siting , design, consenting and permitting of individual projects.

Consenting and Permitting:

- **Action 5:** Future foreshore consenting processes should take into account the broad findings and assessment of this SEA and AA in terms of location and constraint.
- **Action 6:** The foreshore consent process should require developers to put in place appropriate monitoring programmes to assess the effects of their development.
- **Action 7:** The foreshore consenting process should consider the application of an incremental (the 'deploy and monitor') approach as part of the scaling up of offshore renewable energy deployments.

Guidance and Advice

- **Action 8:** The project level mitigation measure/EIA Guidance prepared as part of the SEA Environmental Report could be incorporated into National EIA Guidance for offshore renewable energy developments

- **Action 9:** Development and maintenance of a GIS database tool to inform the Foreshore Consenting process, led by the Marine Institute

Appendix 3: Comment on Natura Impact Statement

The 'Offshore Renewable Energy Development Plan (OREDP) for Ireland: Natura Impact Statement (NIS)' is a key and complementary part of the Draft OREDP. The NIS arises because, in summary, the OREDP may affect sites designated as being of European importance - known collectively as Natura 2000 sites – and an Appropriate Assessment is required to establish whether there will be significant effects on such sites. Natura 2000 sites that have to be considered include Special Areas of Conservation and Special Protection Areas.

The NIS recognises that the Draft OREDP is a very high level plan and, moreover, one which is being set for an industry where the technology associated with the wave and tidal elements is still at the development stage. The core of the document, from a policy implementation viewpoint, is Chapter 7 'Mitigation' which suggests changes in the Actions set out in the Draft OREDP (see Appendix 2 above). The views of MRIA on these are, as follows

- Action 2: refers to institutional arrangements. MRIA would be pleased to see the relevant State and other agencies 'in the marine sector including fisheries and environmental bodies' included on the Ocean Energy Advisory Group. However, the Association believes that membership must be confined to 'key players' in all relevant sectors or the Group- which MRIA wishes to see as a key driver of the implementation of the OREDP-will become unwieldy.
- Action 9: This Action, as suggested by the NIS, in essence requires project developers to demonstrate the likely impact of their proposed developments on Natura 2000 sites. The MRIA recommends
 - Clear and comprehensive guidelines should be issued to provide for this and they should be drawn up only after a full consultation with MRIA and other interested parties.
 - A straightforward appeal process must be made available to promoters in regard to decisions arising from this Action

Finally, MRIA notes that post development monitoring will play a part in addressing knowledge gaps which would be a positive advance for both developers and the State.