Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
Naas,
Co. Kildare.

Eugene Ó Cruadhlaoich Uasal,
Cléireach don Choiste,
Oireachtas Joint Committee on Environment, Culture and the Gaeltacht,
Kildare House,
Kildare Street,
Baile Átha Cliath 2

Via e-mail to eugene.ocruadhlaoich@oireachtas.ie

Date: 30 April 2013

Re: Heads of Climate Action and Low Carbon Development Bill 2013

Dear Mr. Ó Cruadhlaoich,

The Irish Wind Energy Association ("IWEA") is Ireland's leading renewable energy representative body and as such has an active interest in the potential for renewable energy on the island of Ireland. IWEA represents more than 200 members involved in wind and renewable energy development in Ireland and Northern Ireland (through the Northern Ireland Renewables Industry Group (NIRIG), set up in collaboration with Renewable UK). IWEA represents members with projects across the spectrum, in operation, under construction and awaiting connection. In Ireland IWEA members are involved in the majority of currently connected projects and are also involved in more than 85% of the MW of projects to be installed between now and 2020.

Through NIRIG we represent more than 25 company members that have developed over 85% of renewable generation operational in Northern Ireland today and who will contribute a significant majority of renewable energy required to deliver the 2020 targets.

The IWEA membership base includes all large, medium and many small developers as well as financial, legal advisory, consultancy, contractors and other service providers involved in the renewables sector in Ireland and Northern Ireland.

IWEA have a strong interest in ensuring a Climate Action and Low Carbon Development Bill 2013 is brought forward that can address the growing challenges for us all and so please find attached a response to this consultation. We are optimistic that the delivery of a 'low carbon, climate resilient

and environmentally sustainable economy' can be assisted through the Climate Action and Low Carbon Development Bill. We believe that wind energy will have a crucial role to play in this transition and look forward to being involved in the progression of this legislation and in the delivery of measures to achieve this aim.

IWEA would welcome the opportunity to meet with the Committee to discuss our response in more detail at this stage.

Yours sincerely,

**sent by email, bears no signature*

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Caitríona Diviney
Chief Operating Officer
Irish Wind Energy Association

Heads of Climate Action and Low Carbon Development Bill 2013
IWEA Submission to the Oireachtas Joint Committee on the Environment, Culture and the Gaeltacht

30 April 2013

1. Introduction

The Irish Wind Energy Association is the national association for the wind industry in Ireland and is committed to education and awareness building to promote the use of a sustainable energy system in Ireland and thus contribute to a cleaner environment by reducing the demand for fossil fuels.

We believe that Ireland can be a world leader in renewable energy, given its abundant resources and industry experience. The effect of an increased penetration of wind energy in Ireland would be to reduce emissions, create new jobs and investment, create a thriving export industry and protect against rising energy prices.

IWEA supports the development of both onshore and offshore wind with a view to developing a fully integrated and high performance grid infrastructure. To complement this, we support the development of other renewable technologies and in particular ocean energy as a diverse supporting energy portfolio is key to maintaining security of supply.

2. Background

It is recognised that renewable energy development is a vital part of Ireland's strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.

Ireland has entered a new era in energy in recent years and we are all now living and working through the transformation of our electricity sector as we strive for a more sustainable future. Ireland as a small island open economy with little conventional energy resources import more than 90% of our energy supply and hold little sway over global energy markets pricing.

It is also well recognised that the world about us is changing at a faster pace than ever before. Our natural resources are being consumed in ever increasing volumes and security of our energy supply and predictability of our energy costs have become important and urgent challenges for us. Moreover, the real threat of irreversible climate change due to overwhelming increases in carbon emissions is something we cannot ignore.

IWEA is very concerned at the recent figures launched on the 25 April 2013 by the Environmental Protection Agency (EPA)[1] which indicate that while Ireland's greenhouse gas emissions will comply with its Kyoto Protocol obligations (2008 – 2012), Ireland is at significant risk of not meeting our EU 2020 targets even under the best-case scenario.

EPA projections for the period 2012 to 2020 show:

- Ireland can comply with its Kyoto Protocol greenhouse gas reduction obligations for the first commitment period (2008 – 2012).
- Ireland is required to reduce its emissions by 20% by 2020; however, these projections indicate that we will breach our annual obligations under the EU 2020 target from 2016 onwards in the best-case scenario.
- Strong projected growth in emissions from transport and agriculture are the key contributors to this trend.

For action to be taken to tackle climate change, individual countries need to estimate the amount of greenhouse gases they emit and how much they are likely to emit in the future.

In order to meet EU targets, Ireland is obliged to reduce emissions by 20pc from 2005 levels by 2020, but the EPA report says we will breach our EU obligations from 2016 onwards. The State is expected to produce 45.3 million tonnes of carbon this year from agriculture, transport, residential, industry, energy and the waste sectors. This is expected to fall to 37.5 million tonnes by 2020, but current projects suggest at least five million additional tonnes will be produced.

The figures published by the EPA show the projected trends for greenhouse gases up to 2020 and give a picture of Ireland's inability to meet EU and international targets with respect to greenhouse gas emissions. It is recognised too that this comes with a cost, where member states which miss legally binding EU targets would be fined.

In this context IWEA have a strong interest in ensuring a Climate Action and Low Carbon Development Bill 2013 is brought forward that can address the growing challenges for us all.

3. IWEA Position

IWEA welcomes the opportunity to comment on the Outline Heads of Bill as currently presented and please find below IWEA's response to key items presented.

International and European Obligations and Actions

[1] http://epa.ie/pubs/reports/air/airemissions/irelandsgreenhousegasemissionsprojections2012-2030.html

- IWEA welcomes the fact that the Heads of Bill recognises the importance of meeting our EU-mandated targets, which include legally binding obligations to reduce GHG emissions, promote renewable energy and achieve efficiency savings. IWEA agree that existing international obligations should be to the fore in any discussions on climate action at national level, and that Ireland should keep step with these targets. IWEA supports the European Council's target of developed countries reducing greenhouse gas emissions to 80-95% below 1990 levels by 2050.[2]
- We would encourage the Irish government to pursue this objective at European level by promoting the 2030 renewable energy and emission reduction targets, as is currently under discussion by the European Commission in its 2030 Green Paper. IWEA believes that given the long investment cycle involved in many of the industries taking climate action, we must now turn our minds to 2030. Given the current economic downturn, and the associated demand for electricity, it may seem a little premature to be concerned about our energy needs post 2020. But the electricity system is built around assets that take 10 years to design and build, and are then in operation for up to 50 years. It is clear that if we are serious about de-carbonising electricity by 2030, now is indeed the time for strategic thinking. EU Renewable energy and carbon emission reduction targets will aid in filling the policy gap between 2020 and 2050 as they will provide a clear signal on the direction of travel resulting in increased investor confidence.

Absence of a defined target

- IWEA note the absence of a defined target for 2030 or 2050. While we welcome the clear recognition within the draft Heads of the importance of meeting our EU-mandated targets, we do also believe the inclusion of a 2050 target would provide the clarity and certainty to government policy that business needs to make the long-term investment decisions needed to move to a low-carbon economy.

  Ireland's abundant renewable energy resource and proven ability to harness it gives the country a unique competitive advantage that can only be exploited if there are binding EU and International emissions reduction targets. IWEA encourage the Government to engage with its European and International counterparts to progress the development of 2030 targets but also to set a defined roadmap to 2050.

Coherency in implementation

- IWEA welcome that the draft bill provides for both national and sectoral roadmaps, noting that it is intended that national roadmaps will specify the mechanisms to

[2] European Council Conclusions, October 2009, http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/110889.pdf

achieve the management of net greenhouse gas emissions in line with existing EU mandated targets, or targets agreed at an international level.

- Reflecting a cohesive and multidepartmental approach, we note the inclusion also of sectoral roadmaps aimed at achieving emissions reduction or measures enabling specific sectors adapt to the effects of climate change will be devised by the relevant Ministers following a request from the Government.
- IWEA would propose that policy measures under the roadmaps proposed should be outcome-focused and allow market participants the freedom to innovate.
- We propose that roadmaps should focus particularly on enabling policy measures, such as stewarding market participants and other stakeholders to act together to achieve a common objective. For example, administrative processes such as permitting for renewable generating stations and energy infrastructure should be streamlined to avoid duplication, delay and consequent increased costs in developing projects. Likewise, projects to facilitate wind (or other renewables) such as the DS3 programme and Grid 25 should keep step with the roll-out of wind generation so as to maximise the efficiency with which Ireland decarbonises its economy.
- It is important for developers that regulation and policy are stable and predictable. Roadmaps prepared under the draft legislation must be cognisant of the current policy framework and not serve to change policy direction suddenly.
- IWEA believes that Ireland needs to develop as a low carbon and resource efficient economy and that as such all sectors of the economy must contribute to emission reductions. Reductions are needed in all sectors which are currently showing an increasing trend in emissions into the future. IWEA do accept however that while cost-effective greenhouse gas mitigation options may be limited in agriculture and transport, reductions in both of these sectors will need to be achieved in the context of increasing emissions. We do also believe economic incentives can play a role in reducing emissions by stimulating a change in behavioural patterns. IWEA see electric vehicles and alternative fuels like natural gas in freight vehicles to have a lot of potential.

National Expert Advisory Body on Climate Change

- IWEA welcomes the establishment of the National Expert Advisory Body on Climate Change to play a key role in Ireland's mitigation and adaptation efforts and the transition to a low-carbon, climate resilient and environmentally sustainable economy by ensuring that the very highest quality of advice, based on the most up to date science and taking account of all other relevant factors, is available to the Government and individual Ministers to enable robust, responsive, evidence based policymaking.
- IWEA note the intention that the group is to be a high level body comprising of members with a broad range of expertise and is specifically not a

stakeholder/representative body however IWEA would suggest it may nevertheless wish to be able to call on the technical expertise of industry participants through standing committees or task forces and so this flexibility should be introduced.

Conclusion

IWEA have a strong interest in ensuring a Climate Action and Low Carbon Development Bill 2013 is brought forward that can address the growing challenges for us all. We are optimistic that the delivery of a 'low carbon, climate resilient and environmentally sustainable economy' can be assisted through the Climate Action and Low Carbon Development Bill. We believe that wind energy will have a crucial role to play in this transition and look forward to being involved in the progression of this legislation and in the delivery of measures to achieve this aim.

We welcome the broad intent of this Bill and support the efforts to date. While we welcome the recognition of legally binding EU targets we do however believe that the aims of this Bill could be much strengthened by the addition of 2050 targets. Ireland's abundant renewable energy resource and proven ability to harness it gives the country a unique competitive advantage that can only be exploited if there are binding EU and International emissions reduction targets. IWEA encourage the Government to actively engage with its European and International counterparts to progress the development of 2030 targets but also to set a defined roadmap to 2050.

IWEA believe it is imperative we take note of the recent figures produced by the EPA and start counting the cost of climate change as failure to change our behaviour will not just cost future generations, but this one too.

IWEA would like to request a meeting with the Joint Oireachtas Committee, or individually with its members, to discuss the contribution our sector can make to achieving your aims.