



Coastwatch has developed a **5 point Coastwatch Offshore Wind Energy Policy Position summarised below**. This is our broad position to cover the current government and industry activities to have 5GW of OWE connected to the Irish grid by 2030. It is an open document subject to revision as this is a rapidly development field.

‘We see this period as a critical research and demonstration phase where, with all hands on deck, top monitoring and full transparency, offshore wind and biodiversity goals could be achieved.’ said Karin Dubsky, Coastwatch Coordinator.

But she added: ‘achieving that offshore energy target in our most biodiverse, highest blue carbon inshore waters without adequate precaution, nature protection or monitoring is reckless.’

Coastwatch supports EU climate action policy and acknowledges that Offshore Wind Energy (**OWE**) has huge potential for Ireland.

‘We recognise that our archaic marine planning system is finally being reformed. However, as more and more industry-led exploration and plans are being rolled out in our commons ahead of finalising essential reforms and with virtually no monitoring of sea exploration impacts and virtually no protection for our biodiverse blue carbon stocks, we are becoming increasingly concerned’ said Bernie Connolly, Regional Coordinator for Cork.

‘These marine technologies have themselves a significant carbon footprint. Rapid growth has environmental and societal impacts we must acknowledge and better control’ added Roslyn Shaw Reg Coord for Dun Laoghaire.

Large deep port areas are needed to assemble, transport and install wind turbines. Yes the construction brings jobs, but if wiping out local tourism and fisheries then there may be net job losses. Large ports have been built in other parts of the OSPAR region. Let’s count ourselves lucky that we can use them for our ‘by 2030’ OWE construction suite’, giving us a bit of time to learn about their costs and choose wisely before committing to building and shipping wind turbines and blades from Irish ports. ‘It will take extensive widening and deepening of existing shipping channels, which in turn will require ongoing maintenance, with ongoing environmental impacts’, warned Karin. At present this does not seem to be accounted for in OWE Carbon footprint or environmental impact.

Nature Health: 2030 is the EU target year for designating and managing 30% of our sea as MPA to help bring our seas back to health. Ireland is to also achieve ‘Good Environmental Status’ of its marine environment by 2028 under another EU law(MSFD). We fear that whether 30% is designated as MPA or not, our inshore ecosystems are at risk of being in a worse state than today if we keep on applying widespread increased pressure. It requires a huge national and X border effort with a new approach to address our biodiversity crisis and climate crisis simultaneously. In that context we welcome the Citizen Assembly for Biodiversity report and welcome the establishment of the [Offshore Wind Delivery Taskforce](#), bringing all authorities with responsibility for OWE together. The combined forces should be able to manage a new government led OWE surveying approach minimising survey area and impacts. While **informed public participation** is missing **from the** Taskforce [workplan for 2023](#) it could easily be tweaked and public participation substituted for the current ‘Positive public messaging’ brief.

1. THE PRECAUTIONARY APPROACH TO LOCATION

Until at least 30% of Irish waters are designated and managed as Marine Protected Areas, the following areas should be excluded from OWE exploration and licensing:

- Marine Natura 2000 sites and Ramsar sites
- 'Areas of Interest' drawn up by the coalition of environment groups 'Fair Seas'
- Spawning sites and migratory routes for birds, bats, cetaceans, turtles and fish;
- Seagrass beds as blue carbon biodiversity hot spot areas.

This exclusion of existing and potential MPAs and buffers where relevant, can be reviewed when we know more about OWE impacts and ways to minimise them.

2. TRANSPARENT GOVERNMENT LED PLANNING AND EXPLORATION

We need a transparent participatory government led approach to OWE site locations and grid connections. The current system maximises impact and minimises data sharing. Each OWE applicant organises own surveys, often overlapping with those of competitors (see case study). Plans then pop up as [Marine Notice](#) and go ahead with or without foreshore license. Data gathered is owned by the industry with no obligation to share.

3. OFFSHORE WIND til 2030 - RUNNING and LEARNING

Realising ambitious 5GW OWE production by 2030 in our marine commons, means steaming ahead with many unknowns. It is essential therefore that there are enough checks to minimise impacts and react nimbly to adjust the system.

We should also share harmonised international data. Coastwatch proposes:

- **an independent monitoring scheme** for all phases of OWE and environmental impacts. **Citizen science** integrated into the scheme so that the interested public, fishing and charter vessels can contribute in a structured useful way.
- a **data management and publication plan, to ensure usable** real time information as well as annual reports are freely available to all.
- **Licenses with conditions** which are transparent, wise, comprehensive and enforceable for the entire lifecycle of all OWE elements and with reviews.
- **persuasive fining and shut down** for serious breaches of law and permits
- **evaluation meetings to help improve OWE design, siting, data gathering** where industry, authorities and the interested public can consider data, discuss concerns, seek to maximise positive outcomes and future planning.
- **accident cover or bond** to cover removal of any abandoned infrastructure and capture of damaged pieces in case of major weather damage.

4. PORTS

Port development for OWE construction projects (in contrast to maintenance) need to be planned and assessed at strategic OSPAR region level, with SEA and full public consultation.

5. COLLABORATION

Coastwatch will collaborate with others, to support these changes and also participate in best practice case studies.

Citizens are seeing new OWE applications popping as companies invite them to see **their** proposals. It is only when someone like Jim Hurley maps all proposals for an area, including their different cable routes, that the density becomes apparent.

CASE STUDY Offshore Wind Development Proposals off the South Wexford coast

Jim Hurley, 11 April 2023,
southwexfordcoast@gmail.com.

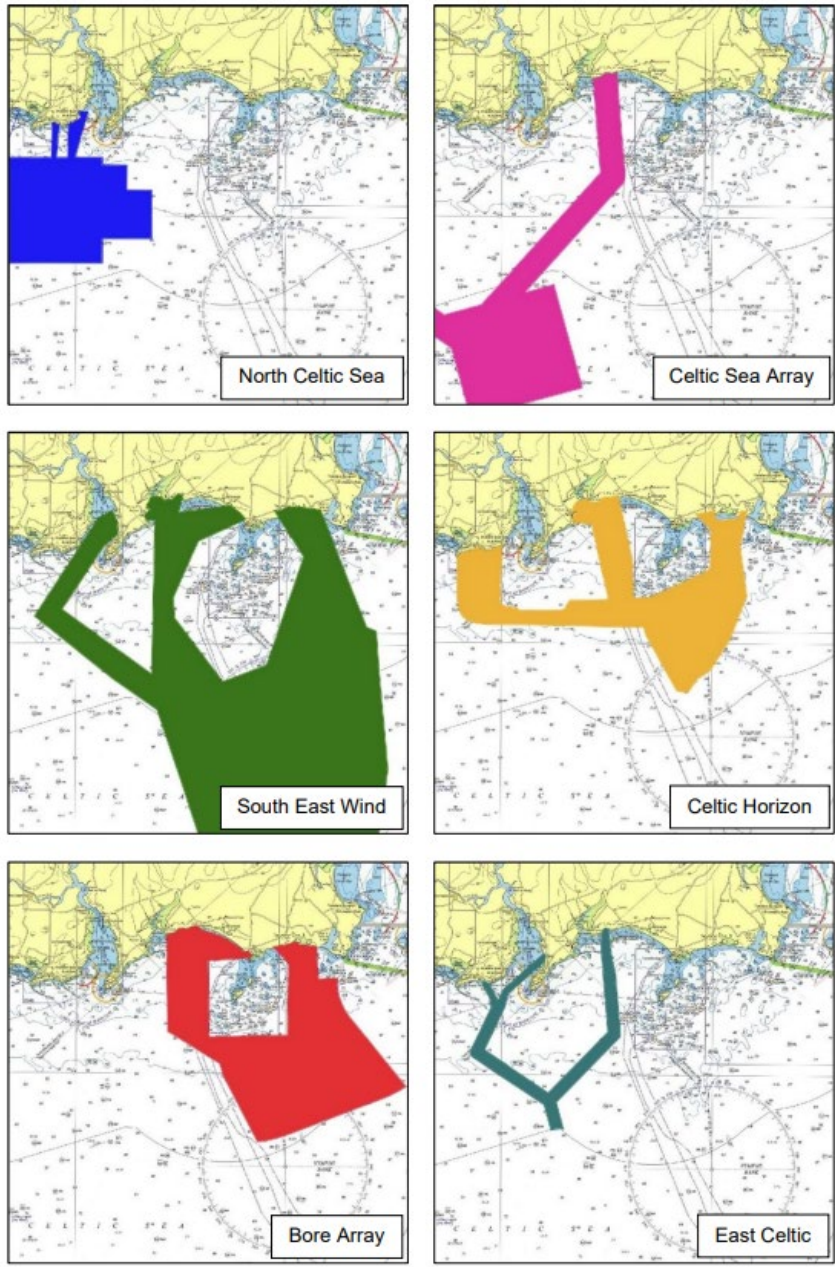


Figure 1. Indicative locations of areas under investigation regarding six proposed wind farm developments on and off the South Wexford Coast.

(Source: Table 1 and <https://www.gov.ie/en/collection/f2196-foreshore-applications-and-determinations/>)

1	Offshore Wind Farm Project:	North Celtic Sea
	Developer:	Energia Renewables ROI Ltd
	Foreshore Licence Ref No.	FS006982
2	Offshore Wind Farm Project:	Celtic Sea Array
	Developer:	SSE Renewables (Ireland) Ltd
	Foreshore Licence Ref No.	FS006983
3	Offshore Wind Farm Project:	South East Wind
	Developer:	Mainstream Renewable Power Ltd
	Foreshore Licence Ref No.	FS007374
4	Offshore Wind Farm Project:	Celtic Horizon
	Developer:	Celtic Horizon Offshore Wind Farm Limited
	Foreshore Licence Ref No.	FS007384
5	Offshore Wind Farm Project:	Bore Array
	Developer:	Bore Array Ltd
	Foreshore Licence Ref No.	FS007464
6	Offshore Wind Farm Project:	East Celtic
	Developer:	Celtic Offshore Renewable Energy Limited
	Foreshore Licence Ref No.	FS007488

Table 1. Offshore wind farm projects on the south Wexford Coast.

(Source: <https://www.gov.ie/en/collection/f2196-foreshore-applications-and-determinations/>)

Currently we know of 6 OWE proposals for the South Wexford coast between Carnsore point and the Waterford estuary. As Figure 1 shows, most companies have published both turbine site interests and potential cable routes to shore, while one (East Celtic, recently taken over by RWE) has published potential cable routes, but not their wind farm siting proposal. When one overlays the 6 proposals (Figure 2) perhaps 80% of our territorial waters in this area are earmarked for exploratory surveys and sampling which each proponent will commission independently.

Figure 3 shows that most of the near shore highest biodiversity value area is internationally protected in 8 Natura 2000 site 'jigsaw pieces'. The area is also a Fair Seas¹ 'Area of Interest' identified by scientists reviewing its importance for fish, crustaceans, cetacean and birds data.

In terms of public information and participation in decision making, the recent publication of Marine [Notice No. 25 of 2023](#) signals that SSE is planning geophysical site investigations from April 17th til end of May for the Celtic Sea Array. The company needs no Foreshore permit as operating beyond our territorial 12nms. So we do not have detail of the methods to be deployed and have no legal vehicle to ask for it. We have been unable to find screening for an appropriate assessment for this investigation work and are highly concerned as to seismic survey impacts on spring plankton and biota. Is there independent monitoring? Probably not.

¹ the coalition of Marine eNGOs set up in 2022 <https://fairseas.ie>

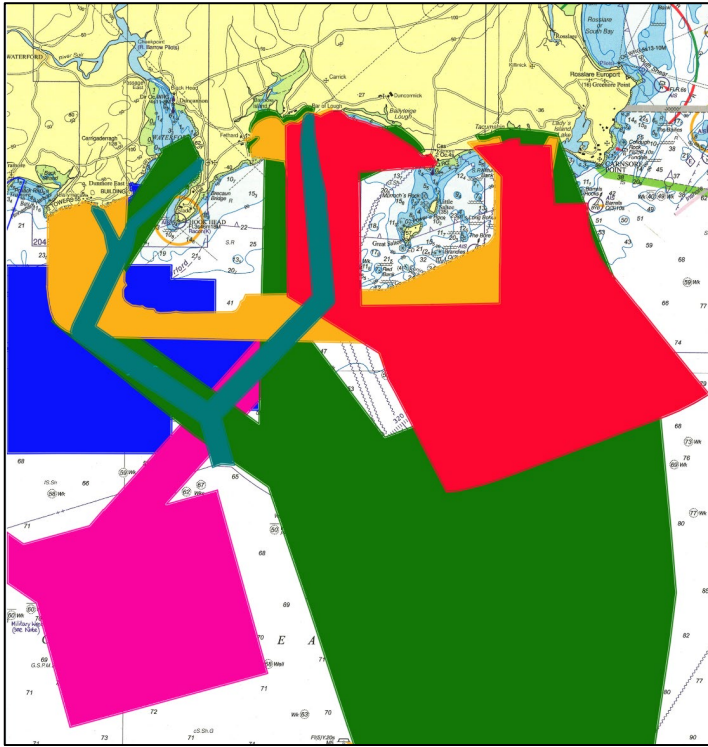


Figure 2: Composite of the six wind farm proposals shown in Figure 1 above.

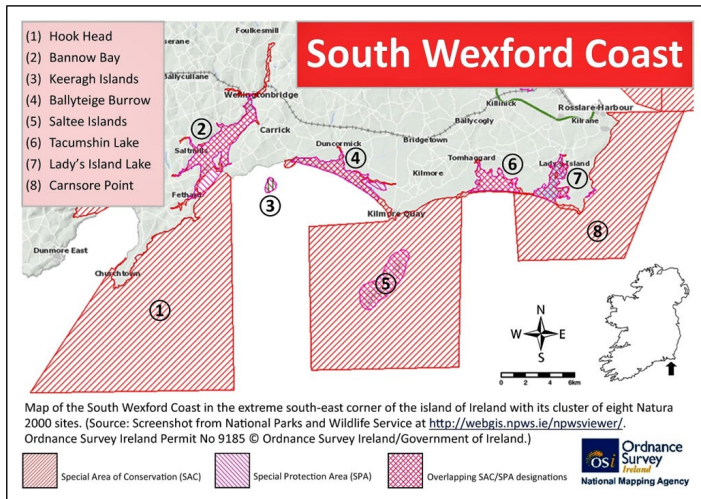


Figure 3. Cluster of eight Natura 2000 sites on the S. Wexford Coast. (Source: www.southwexfordcoast.com)

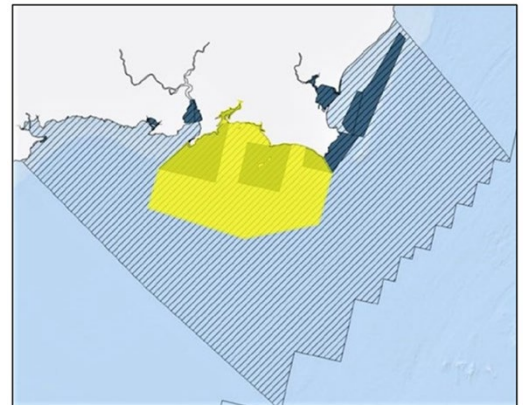


Figure 3. Southeast Coast MPA Area of Interest (hatched) with existing de facto MPAs (dark blue) and the proposed South Wexford Coast MPA highlighted (yellow).

(Sources: Fair Seas, 2022 page 50, Figure 2.9.1 and Hurley, 2021 page 3, Figure 1)

Nb – Other eNGOs and fishing groups are preparing policies and coalitions are emerging.



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