

1st December 2006.

Energy Planning Division,
Department of Communications, Marine and Natural Resources,
Adelaide Road,
Dublin 2

Re: Green Paper: Towards a Sustainable Energy Future for Ireland

Dear Madam / Sir,

Renewable energy is very important to Ireland. Fáilte Ireland welcomes the Government's commitment outlined in the Green Paper that 15% of our electricity supply should come from renewable sources of energy by 2010, rising to 30% by 2020. Ireland's tourism industry has, for decades, traded on the island's clean, green image and this image will undoubtedly benefit from a move towards the generation of greater levels of energy from renewable sources.

The increase in the overall renewable energy target is also likely to be welcomed by individual members of the industry. The tourism industry is largely comprised of small to medium sized enterprises which are very sensitive to increases in operating costs, including the price of energy. The results of Fáilte Ireland's *Tourism Barometer* Survey for 2006 show that the cost of energy is the operational issue that currently causes most concern among paid serviced accommodation. Of the 900 tourism enterprises in the Republic of Ireland that were surveyed, 22% cited high energy costs as the issue of most concern to them. The use of renewable sources of energy generation and improvements made in energy efficiency, where these initiatives have been taken by individual businesses, have helped to reduce their operating costs. This was demonstrated by the Greening Irish Hotels programme (operated by the Irish Hospitality Institute and funded by the EPA) which involved the participation of 55 hotels and concluded in September 2006 (www.greeningirishhotels.ie). Fáilte Ireland, through its Performance Plus programme, also provides advice to tourism businesses on how they can improve their energy performance and make significant cost savings as a result (www.failteireland.ie/performanceplus).

In October 2006, the first 11 EU Flower eco-labels were awarded to accommodation providers operating within the Greenbox, Ireland's first cross-border ecotourism destination located in the northwest. The EU Flower was introduced to the tourism accommodation sector across the European Union in

2003 and the use of renewable energy is one of the requirements of the label. It is the intention of Fáilte Ireland to promote the uptake of the eco-label by other accommodation providers throughout Ireland.

In order to build on the momentum generated by these initiatives over the past two years, further financial incentives and technical supports are required to assist the tourism sector in becoming more energy efficient and in capitalising on the range of technology available on the market. Such incentives should be considered as part of the overall energy policy set out in the Green Paper to increase energy efficiency across the economy and in particular in the tourism sector.

Fáilte Ireland notes in the Green Paper that biomass and wind have been the largest contributors to the rise in the overall share of renewables over the past decade. However, the drive to further increase the overall share of renewables to 2020, while very welcome, must not be at the expense of the raw material of our largest indigenous industry, tourism. This concern is particularly relevant in relation to the continued expansion of the wind energy sector. Ireland's scenic landscapes and seascapes are one of the industry's most vital raw materials. They are also among its most fragile. Ireland's landscape is dynamic and will continue to change and evolve into the future, shaped largely by human needs and activities. However, we must ensure that we retain the quality, character and distinctiveness of those landscapes and seascapes most valued by the tourism industry. Time and resources must, therefore, be dedicated to the sustainable planning and development of the wind energy sector to ensure that it does not impact negatively on the ability of the tourism sector to operate at its maximum sustainable capacity.

Tourist amenities such as scenic landscapes, scenic routes, viewing points, and walking and cycling trails have the potential to be negatively affected by windfarms, primarily due to the loss of scenic amenity that can result. However, issues surrounding scenic landscapes and windfarms are far from being straightforward. In dealing with issues such as scenic values, visual amenity and the aesthetic qualities of windfarms themselves, individuals tend to have their own personal views and absolute objectivity is simply not possible. The *Wind Energy Development Guidelines* (DoEHLG, 2006) state that "*wind energy developments are not incompatible with tourism and leisure interests, but care needs to be taken to ensure that insensitively sited wind energy developments do not impact negatively on tourism potential. The results of survey work indicate that tourism and wind energy can co-exist happily*". However, the *Guidelines* fail to add another finding of the same survey carried out by Sustainable Energy Ireland *Attitudes Towards the Development of Wind Farms in Ireland* (SEI, 2003), which states that 43% of respondents "*felt that [wind turbines] should not be located in areas of scenic beauty and tourism. These are not insignificant percentages, and they would have to be carefully borne in mind*" (p15).

In developing and expanding the renewable energy sector as a response to, *inter alia*, environmental pressures (*Green Paper*, paragraphs 1.1.16; 1.2.11; 1.2.22; 1.2.30; 1.3.4), it would appear, therefore, that one of the key challenges to the

sector is to ensure that this expansion does not in itself result in the degradation of environmental resources, in particular landscapes and seascapes, which are core assets of the tourism industry. It is welcomed, therefore, that the Green Paper states that one of the three pillars upon which energy policy in the future will be based is “*environmental sustainability*” (p.5). It is important to ensure that environmental improvements that are made in the area of greenhouse gas emissions as a result of the implementation of the proposed energy policy are not replaced by increased pressure on the quality of other important environmental resources such as landscape and biodiversity. In general, the framework of policy, planning and support for the renewable sector should aim to minimise adverse impacts on the natural and cultural heritage by securing the right technologies, and the right kind of development, in the right places.

Strategic Environmental Assessment (SEA) at the national and regional levels is an area which has been neglected to date in terms of planning for the expansion of the renewable energy sector and should be recommended as a priority area of research that needs to be targeted in the future (Section 1, Question 12). The SEA that was undertaken of the offshore wind energy resource in England and Wales by the Department of Trade and Industry [*Offshore Wind Farm Consents Process – Guidance Notes (DTI, March 2004)*] is considered to be a model of good practice. There is also a deficit in co-ordinated research on the environmental impacts of renewable energy projects. The COWRIE project (Collaborative Offshore Wind Research Into The Environment), which has been established in the UK, should be viewed as a good example in this regard which could be emulated in Ireland.

It is also considered that in terms of the development of offshore wind energy projects, the Foreshore Act should be amended to facilitate provision of an appeals process in the awarding of Foreshore Licences (without having to resort to the High Court) and greater public involvement in the licensing process. In addition, provision should be made in an amended Foreshore Act for the protection of landscapes and seascapes.

In moving forward on this issue, policy convergence must be achieved between the expansion of the renewable energy sector and the protection of the core environmental assets upon which the tourism industry depends. It is the view of Fáilte Ireland that the solution lies in adhering closely to the principles of sustainable development in the development of all infrastructure associated with the proposed energy policy and with the application of SEA tools in planning the future expansion of the energy sector in order to identify both the likely positive and negative environmental consequences.

Yours sincerely,

Paddy Mathews
Manager, Environment Unit.