

**Energy Green Paper Submissions,  
Energy Planning Division,  
Department of Communications, Marine and Natural Resources,  
Adelaide Road,  
Dublin 2**

24<sup>th</sup> November 2006

**Submission of the Fingal Development Board**

A Chara,

The FDB welcomes the opportunity to comment on the Green Paper "Towards a Sustainable Energy Future for Ireland". The Board recognises that the various policies, objectives, and targets described in the Green Paper, if implemented, have the potential to significantly reduce Ireland's contribution to global greenhouse gas emissions.

The Board believes that greater use of renewable energy combined with significant improvement in energy efficiency is the key to sustainability. We share the Government's "strong commitment to the promotion and development of renewable energy" (1.2.33) and have established a project team under our revised strategy 2006 -2008 to investigate rational energy use and renewable energy in the county.

The energy question is extremely complex and there are issues covered in the paper, which unfortunately we are not sufficiently informed on to respond. However, we would like to make a number of comments in relation to the section on the Promoting the Sustainability of Energy Supply.

**The Role of the Public Sector and CDB's**

It is not clear what role, if any, the Government envisages for public sector bodies like the Local Authority and CDBs. In this regard we would point to the positive contribution the public sector can play in achieving the national

standards under the Kyoto protocol and others. Public sector bodies such as local authorities and health boards have a significant impact on energy usage both directly, in that they are themselves energy intensive organisations, and indirectly through their purchasing power. For example, local authorities will spend €1.3 billion in 2006.

The series of policy actions listed under the renewable energy pillar document, (and indeed under the other two pillars as well), would seem to have a 'top down' approach. Tackling the energy question is a challenging task by any standards and if we are to succeed we need to have all hands on deck. Action is needed at every level - local, regional and national. What we need to look for is the cascade effect with local plans for renewable energy and energy efficiency feeding into regional plans, which are then subsumed into a national plan. We need to grow the solution from the roots up rather than the top down.

#### **An example of the roots up approach**

The Green Paper makes reference on p.80 to building standards, to Sustainable Energy Ireland's Houses of Tomorrow Programme and to energy efficiency in social housing. Fingal County Council has stipulated in seven recent major Local Area Plan areas (with a total of between 11,000 and 12,000 dwellings) that housing must have a heat demand at least 60% less than the current Building Regulations and that 30% of that heating demand must be met by renewables. While the Minister for the Environment, Heritage and Local Government has praised the initiative it is not clear at this stage that the DoEHLG will approve funding for the inclusion of these measures in future social housing schemes proposed by Fingal. It is important that there is a consistent policy approach across all strands of government to ensure that innovative and effective energy efficiency measures can be implemented, particularly at local level.

It is possible to identify a number of activities across a range of services, which local authorities could take to improve energy efficiency and substantially increase the uptake of renewable sources of energy.

#### **How the Local Authority and CDBs Can Help**

- Carry out audit of activities and services of Board member organisations to establish the extent of energy usage, assess the extent of efforts being made to introduce efficiency measures and the opportunities available to use alternative energy sources
- Adopt Energy Efficiency and Sustainable Energy Action Plans for the county
- Set energy savings targets across a range of sectors including housing, industry, waste management and transport
- Carry out energy insulation programme in local authority houses
- Set energy specifications and standards for all publicly rented houses and households in receipt of rent allowance
- Introduce green procurement practices including the introduction of energy performance measures for major construction works and maintenance services
- Set higher thermal performance and insulation standards in Building Regulations
- Introduce energy design as an element in Local Development Plans and Action Plans
- Introduce targets for the use of renewable electricity

There is no doubt that changes in how public sector organisations do their business could play a pivotal role in ensuring that Ireland meets national and international targets for reductions in greenhouse gas emissions. In addition, County Development Boards could do a great deal to co-ordinate action on energy efficiency and sustainable energy. They can set clear quantitative long-term goals to drive down energy emissions across a range of organisations and activities and monitor the implementation of these changes.

### **Implementation and Monitoring**

The Green Paper acknowledges that implementing an energy policy will require a co-ordinated approach. There are so many organisations with responsibility for different aspects of the energy spectrum. In addition to six separate Government Departments, the Green Paper lists eight other bodies who are involved in various ways in the energy industry.

The Board agrees that the scale and complexity of this issue calls for a cohesive multilateral approach. However cohesion will not happen of its own accord. Organisations, including Government Departments, have different cultures and very different ways of doing things. A strong deliberate policy change is required that insists on co-operative working and initiatives between Government bodies and state agencies. In order to ensure a broad based and sustained co-operation some form of positive discrimination (such as funding for inter-agency projects, or reduction in budgets where there is very or no evidence of cross agency co-operation) could be considered.

The transition, which is required in the energy systems, is fundamental and it will not be possible to achieve it without fundamental change in institutional and regulatory systems. The diversity of energy systems, which inevitably forms part of increased use of renewables and increased energy efficiency, should be supported by a dynamic regulatory system that keeps pace with developments. Government policy needs to be directed at allowing and facilitating the institutional changes needed to switch to renewable-based and decentralised energy systems. This is of fundamental concern to local authorities and CDBs because local authorities are well placed to play important roles in decentralised energy systems as they do already in many other countries.

Regulatory control should be clear and directed at clear policy targets, with reduction in greenhouse gas emissions as an overriding target. The targets should be mandatory and implementing bodies must be required by regulation to meet specified targets. Monitoring the implementation using appropriate performance indicators is essential. The entire process should be overseen by a High Level Group under the direction of an independent chairperson, charged with exercising regulatory oversight, verifying progress, and taking corrective action where necessary. Local authorities/CDBs would need to be represented on the Group.

In conclusion the Board believes that we as a society must come to an understanding of the issues we are facing and the consequences of doing too little too late. Working in conjunction with a wider global community we would be confident of our combined abilities to tackle the known causes of climate change.

We would like to take this opportunity to thank the Department of Communications, Marine and Natural Resources for the Green Paper and for giving us the opportunity to submit comments and suggestions.

Yours sincerely,

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Anita Morris,  
Secretary to the Board,  
Fingal Development Board