

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

The following is the submission of Forest Friends Ireland/Cáirde na Coille in response to the Green Paper; “Towards a Sustainable Energy Future for Ireland”

We would like to start by highlighting two areas, which have the potential to make dramatic contributions, and they are;

- 1) Firstly, the development of a grants system for the insulation of all existing buildings, both domestic and commercial. This would mean huge savings for the individual, the local authority and the state. As part of the process, the Department of the Environment, Heritage and Local Government and Local Authorities should devise such schemes as they did in the past. The greater involvement of Local Authorities should be achieved in the context of Local Agenda 21.
- 2) Secondly, the proper development and promotion of micro-technologies down to the individual household level needs to be urgently re-assessed and specific and comprehensive grants programmes implemented. Taken together, these two have a much greater role to play than to date provided for. The Green Energy Paper tends to overemphasise the importance of a sectoral approach while we feel not fully exploring what might be termed a “bottom up” approach, whereby the individual and community is empowered to play a key role. The success of recycling and other initiatives at this level has shown the willingness of individuals to be part of the process. A suitably focused and promoted grants system would be necessary to realise the full potential in these ‘micro’ areas with immense possibilities.

There is now a real sense of urgency in implementing effective measures to ensure compliance by firms in the energy and industrial sector, and in the agriculture and domestic sectors, in order to avoid an ever-increasing burden of penalties falling on the taxpayers. The Stern report has shown that our continued economic prosperity depends on the development of clean energy programmes at all levels. The problem of climate change, or climate crisis, tends to be looked and analysed under economic and sectoral headings in the main. While it is essential to carry out economic analysis, ecology should be the starting point and the problems are in a fundamental sense, environmental. The conservation of a finite world, the preservation of fragile ecosystems, minimising ecological footprints, the utilisation of scarce resources, the potential for use of non-depleting and non-polluting resources, should underpin the analysis. The policy of carbon trading and buying credits, while it has a certain validity, in the short term, given the crisis which we are in, should be viewed as temporary and of necessity not tackling the

root causes of the problem.

The Need for a Department of Energy and Carbon Reductions: Because of the enormity of the problem, a separate Department of Energy and Carbon Reductions should be set up. All departments should feed into this one on the basis of pre-agreed common goals. Sectoral interests of other departments would have to be minimised for policies to be fully effective. Ideally also, cross party support should form the basis upon which commonly agreed policies can be built. A cross party approach could move the horizon far further than the next or subsequent election.

The Role of Ecological Non-Governmental Organisations: While there are some consultative processes designed to involve ecological non-governmental organisations in decision-making, new structures are needed in terms of partnership at the national level, whereby an appropriate multi-stakeholder approach can be achieved. At present the consultative process is in the main, top down, somewhat haphazard and submissions are invited through advertisements in national newspapers in preference to dialogue and the development of partnerships in open fora . The idea that government constructs such as Comhar can represent the views of Environmental NGOS is not tenable.

Spatial Planning: Firstly, Forest Friends believe that the present National and Regional spatial strategies are not working. People are now commuting ever-longer distances. Employment opportunities are not located convenient to where people reside. Counter magnets are needed to the large cities. In that context the land use patterns should be reviewed in order to minimise long distance commuting. Secondly, many people who cannot afford to buy houses in the main cities are doing so in rural areas, and then commuting to cities like Cork, Galway and Dublin. It is obvious that a purely free market approach has not and will not work and that if present policies continue, congestion will increase rather than decrease. They have a role to play in the context of climate change. The serious losses of open space, particularly in the urban areas should be re-evaluated. In planning terms it is now easier to get planning permission to build on open spaces. Perhaps there should be a National Landscape Conservation Study carried out in the context of climate change. Thirdly, increased building densities, can be achieved, while conserving open spaces, rather than reducing them. Higher densities are appropriate particularly at key public transport nodes. Fourthly, there are examples of best practice in terms of sustainable local planning and an examination of these would prove very beneficial. Essex County Council, for example operates a flexible points system, which covers various aspects of energy and environmental conservation. Essex has for a proven track record in terms of innovations in housing development and spatial planning. In general urban sprawl should be discouraged for a more compact type of development.

Protecting Open Spaces from Development: Many of the fathers of Town and Country Planning used the term “the lungs of the town or country” when talking about open spaces and in the early development plans public open spaces and many privately open spaces were well protected from development. There appears to be a fundamental change in many areas of planning in this regard and open spaces are frequently re-zoned for development. A review of present policies vis a vis the tenets upon which Town and Country was originally formulated and in the context of the climate change is now appropriate. It is a fact that open spaces in contrast to hard surfaces help to keep temperatures down.

The Journey to Work, Flexible Working Hours, Teleworking, Teleconferencing: The increased emissions of CO₂ due to the car journeys involved in the journey to work could be greatly reduced by the greater use of flexible working hours, teleworking, i.e. working locally using new technology, and tele-conferencing as a substitute for small group meetings. Here phone and video can be as effective in discussions and decision-making without the need to travel long distances. A detailed study should be undertaken to assess the potential of maximising innovation in this regard for each sector of the economy. Three objectives of this study and analysis should be a) maximising reductions in CO₂ levels, b) maximising reductions in car journeys to work and c) Identifying what supporting and easily available technologies should be available in local communities. This would include easy access to computer and teleconferencing facilities at a local community level. Such an approach would enable Ireland to be a leader in the development of communications technology.

The Role of Trees: The symbiosis of trees, each of which will store on average a ton of CO₂ in their lifetime and which provide oxygen have to be promoted in a more active way. Too many trees are being felled at present to facilitate new developments. Increased protection and penalties for tree removal should be introduced in the context of new legislation. The optimum forestry solution is, we maintain, to regenerate and develop our native forests.

Methane Gases: Most emphasis, in terms of planned reductions, has been placed on CO₂ emissions. However in the long term, methane gas emissions may accelerate, although emissions have been stabilised in the Agricultural Sector. The threat of increased emissions may result from warming waters and the depletion of peat lands. When water bodies are warmed up, methane is released at an increasing rate, which if not checked would have with the potential for devastating effects on climate. The utilisation of methane gasses in the context of farming from slurry should be promoted in the context of sustainable farming. Energy can be sourced from the methane for the benefit of the farm and the local community. Sufficient research has already been done to show the potential in this area and it should be moved on to an urgent implementation phase.

Wind Farms: While increased provision has been made in the development of wind farms, planning of these should be made in the context of a National Landscape Conservation Plan and not be perceived as somewhat haphazard and controversial. The Irish Landscape is an invaluable asset, which was provided by the forces of nature to us free gratis. Its erosion has been piecemeal and could be destroyed in time. Secondly, there are no grants at present for offshore wind Farms. This situation should be rectified, as there is great potential in this regard. The development of new grants and the revision of planning regulations in relation to micro

wind technology, by the Minister for the Environment, Heritage and Local Government, is very welcome and timely.

Public Transport: Investment in public has not been sufficient to change the modal split between public and private transport. Increased investment is needed in order to provide new and upgrade existing rolling stock. The feasibility of combining rapid transit systems, alongside motorised corridors such as the M50 should be carried out. There is now considerable demand from the public for the development of a national rail network. This development affords an opportunity for the government to work in partnership with local groups. Some of the advocacy groups which come to mind are the “Midland Railway Action Group”, “Meath on Track”, “The Western Inter-county Railway Committee promoting the “Western Rail Corridor” (WTC), “West on Track”, “South East on Track”, and the “Athlone to Mullingar Line” initiative. The rebuilding of a comprehensive national passenger rail network should be looked at in terms of long term sustainable passenger transport, with the necessary promotion and ticketing, including appropriate subsidy to make public transport more attractive and change the modal split between private and public modes.

Freight Transport: It is essential that rail freight transport be actively promoted and subsidised. It should be a growth rather than a diminishing enterprise. Even in a country like the United States, where the motor car is dominant, it is possible to witness the passing of freight trains which transverse vast areas, for example along the Rocky Mountain terrain, which are so long that they can take up to half an hour to pass

Vehicle Tax: Vehicle tax should be such as to further encourage users to invest in vehicles, which are the most economic in their use of fuel and environmentally friendly with regard to the toxicity of their emissions. .

Car Pooling and Car Sharing Schemes: It is true to say that as a general principle, lip service is given to the notion of car-pooling and car sharing in Ireland. Specific promotional awareness schemes with local and national promotions should be developed, with whatever resources are necessary to make them effective. Specific targets and monitoring should be part of the initiatives.

More Active Promotion of Greater Energy Efficient Appliances: There should be more active promotion of the more energy efficient appliances, through awareness, better economy labelling, greater publicity and subsidised promotion schemes, including the use of local and national media campaigns.

The Provision of Safe and Attractive Cycling Networks at National and Local Levels: In the context of our cities, towns and villages particularly, significant reductions in the number of car journeys can be achieved by making cycling more attractive and safer. One of the areas in which environmental improvements can be made and emissions reduced is with the provision of safe, and attractive cycling networks at national and local levels. This has not happened. Safe cycling should be actively promoted through national and local projects, through the national and local media. Traffic speeds should be reduced, particularly on neighbourhood roads, and for school runs. There should be “hands on” training and re-training projects to promote safe cycling for young and old. The feasibility of credit systems whereby cyclists could be rewarded for the extent of their usage of the bicycle, should be examined, and implemented. Well-tried and tested city centre hire a bike, or free bike projects such as those, which operate in other European cities, should be rolled out without further delays.

The ESB Monopoly of the National Grid: The monopoly of the ESB has a serious effect on preventing progress. Access to the grid is a problem for alternative energy sources.

Energy Metering: We agree with the with regard to the installation of appropriate energy metering systems, with regard to their following two policy statements:

1) *“There is absolutely no technical reason whatsoever why any of the existing metering options available in Ireland, or net metering, cannot be used as desired for micro generation installations. It is essential that CER become fully aware of these technical arguments, and that it disregard all arguments from any part of ESB that suggest that the various metering options (bar the real 'Smart' option) are not technically feasible in Ireland. The SEI Study on metering options¹ is helpful in this regard, and it is notable by its absence from the CER paper. Therefore, the real issues in play are billing and administrative.”*

2) *“There is really no excuse for not adopting net metering at some appropriate level, and that is why so many jurisdictions have done so. IWEA can agree with CER that the concept of really 'smart meters' provides exciting possibilities for the future of trading, even at the small scale level, and for real demand side management, peak load minimization and so on. Indeed, we might concede that net metering will ultimately be an inferior option, since customers with smart meters could, in the future, elect to manage their demand at peak times, export their power instead (thus supporting the system), and optimize their revenue, once the meter made the market transparent to them. The difference is that net metering is available, whereas sophisticated smart metering is not, yet”.*

Rewarding Best Practice: While the polluter pays principle is frequently quoted; perhaps the rewarding of best practice should be more actively promoted.

Solar energy: It is quite a common practice in some countries that the south facing sides of some suitable tall buildings include a maximum number of solar panels. This practice should be actively encouraged.

Biomass and Wood to Energy: Biomass and Wood to Energy can be further developed using fast rotation willow and other suitable native trees and plants. The introduction and widespread use of “Miscanthus”, “Elephant Grass” and the effects on native flora of should be carefully assessed and the precautionary principle operated if there are possible detrimental effects.

Peat lands: Peat lands are one of the major global carbon stores and play a key role in controlling the levels of carbon dioxide in the atmosphere and mitigating climate change. The preservation of peat lands should therefore be built into the national strategy. The disturbance of the peat lands releases methane causes increased acidification of rivers affecting spawning grounds. Also, amounts of phosphorous and nitrates have been used

¹ "Metering Options for Small-Scale Renewable and CHP Electricity Generation in Ireland", ILEX Consulting for SEI, May 2005

far in excess of permitted levels, affecting various forms of life in the rivers, including the pearl mussel, a protected species under EU legislation.

John Haughton

Chairman

Forest Friends Ireland/Cáirde na Coille

November 30th. 2006

<http://www.forestfriends.ie>/email jjhaughton@gmail.com