

**Comments on Energy Green Paper**  
**Waterford Chamber / Waterford Energy Task Group**  
**21 December 2006**

## **1 General Comments**

- 1.1 We believe that the general policy and directions outlined in the green paper are sound. They reflect the current situation, they identify most of the main related issues, and they show where we should be heading. For such a lengthy document, it is in some areas a little light on how we will get there.
- 1.2 We do have a concern that the paper addresses three main issues - Security, Sustainability & Competitiveness of Energy Supply. In our view a fourth equally important issue is missing, namely the Greenhouse Gas (GHG) Emissions Performance of Energy Supply. Although this subject is raised throughout the paper, it is not given the level of importance that it merits. The recent budget revelation that we intend to buy carbon credits rather than meet out Kyoto performance commitments perhaps confirms this perception. A much more aggressive approach to the GHG issue is required as part of our energy strategy.
- 1.3 Our renewables target for electricity generation is stated as 15% by 2010 and 30% by 2030. We have great concern about our ability to meet these targets. While the overall policy is sound, an aggressive and imaginative approach to implementation is urgently required.

## **2 Specific Recommendations**

With the above in points mind, the following observations and specific proposals are made;

### ***2.1 Transport***

- 2.1.1 Fuel efficiency is reduced to zero when vehicles are halted in traffic jams. The existing Transport 21 initiative will go some way to help, but rather more is needed. All our population centres are subject to increasing traffic problems.

This is made worse by rural housing planning in recent years, where ribbon development been allowed to proceed largely unchecked throughout the countryside. This means that ever increasing numbers of people require personal transport to get to work, school, shops and social engagements. In these circumstances public transport will never

be a viable solution for rural dwellers. However, an urban park-and-ride policy would go a long way to relieving the most fuel inefficient (and time-consuming) stage of the journey into population centres. It would also be equally beneficial to suburban residents.

As a minimum, Cork, Limerick, Galway and Waterford should have park-and-ride facilities on all main arteries, served by bus, light rail or waterbus as appropriate.

- 2.1.2 At present, road tax is based upon vehicle engine size. This means that a diesel family saloon achieving 60 mpg is taxed at the same rate as a similar capacity petrol-engined 4x4 achieving 20 mpg. Road tax should be based upon emissions rather than engine size.
- 2.1.3 The tax on Biofuels should be greatly reduced (or even for a time removed) in order to stimulate the sluggish take-up witnessed to date. Likewise, the existing 5% biofuel content restriction on road fuel blends could be relaxed.

## **2.2 Renewables**

- 2.2.1 The ribbon development of rural Ireland does have one benefit which we should take advantage of. Widely spaced houses with relatively large grounds are ideal candidates for installing domestic wind turbines. If this were to be actively encouraged, rural Ireland could become substantially self-sufficient in electricity generation capacity.
- 2.2.2 The Greener Homes scheme should be widened to include domestic wind turbines and planning guidelines should be developed to simplify the planning approval process.
- 2.2.3 Domestic and small business micro-generators should pay only for their net electricity usage from the grid – or receive payment if they generate a net surplus. Rates could be adjusted to take account of performance during peak grid load times.
- 2.2.4 The Greener Homes scheme should be enhanced by including low / no interest loans for the householder's share of the capital cost. The loans should be paid off at the rate the householder saves energy costs.
- 2.2.5 Security of supply for wood pellets needs to be addressed. At present there is only one manufacturing plant in (Northern) Ireland. Further plants need to be encouraged if confidence in this renewable technology is to be maintained.

## **2.3 Energy Efficiency**

- 2.3.1 A grant scheme should be introduced for improving the energy efficiency of existing homes, based on the Building Energy Rating (BER) survey. This will speed up improvements in existing housing stock and increase awareness of the BER system.
- 2.3.2 An equivalent business scheme could be developed in parallel with the proposed domestic BER grant scheme.

## **2.4 Agriculture**

- 2.4.1 The Common Agricultural Policy is over-ripe for a complete restructuring. At present we pay EU farmers to produce (or not to produce) food crops which are not required and which only serve to pollute our groundwater with nitrates and to damage the economies of third world producers. The whole approach should be rapidly scrapped. EU farmers should instead be paid a carbon allowance for growing fuel crops, based on the GHG savings as against burning fossil fuels.

## **2.5 Waste**

- 2.5.1 At present we send about 40% of our waste to landfill. This produces carbon dioxide and the much more harmful methane as greenhouse gases. Most of this waste could be incinerated, producing carbon dioxide, water vapour and no methane.

As a bonus, 20% of the energy released can be converted to electricity on the grid and 60% to useful heat which can be used via distributed heating systems (about 20% is lost).

Incineration should be adopted as an integral part of our waste and energy policies.