



The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to:

[Energy Strategy for Northern Ireland: consultation on policy options](#)

Submitted on 30/06/2021

Consultation questions

Q1: Do you agree with the overall goal of achieving **net zero carbon energy** no later than 2050?

The Northern Ireland Marine Task Force (NIMTF) welcomes the opportunity to comment on the *'Energy Strategy for Northern Ireland'*. The urgent need to tackle climate change and therefore, move Northern Ireland's (NI) power generation to fully renewable sources, makes this matter of the utmost importance.

Considering the scale of environmental and societal challenges due to increasingly negative impact of anthropogenic climate change, NIMTF believe a more ambitious target for the energy sector and Northern Ireland as a whole, is needed. **NIMTF suggests the overall goal of achieving net zero energy is changed to no later than 2045.** Interim emission reduction targets for Northern Ireland (to include all sectors, not just energy) by 2045 are also needed. Whilst we acknowledge that a net zero target by 2045 presents a significant challenge, we believe it is vital to galvanize the necessary action, incentives and investments required to drive transformational change and address the climate emergency appropriately.

NIMTF supports the ambition of the Private Members bill¹ on climate change currently making its way through the legislative process in the NI Assembly. It's overriding climate objective is the *'establishment in NI of a net-zero carbon, climate resilient and environmentally sustainable economy by the year 2045'*.

Taking peer-reviewed scientific literature into account, NIMTF considers climate change a significant threat to the marine environment nationally and internationally². Climate change is having profound

¹ <http://www.niassembly.gov.uk/assembly-business/legislation/2017-2022-mandate/non-executive-bill-proposals/climate-change-bill/#:~:text=A%20Bill%20to%20enable%20the,Office%3B%20guarantee%20existing%20environmental%20and>

² https://www.iucn.org/sites/dev/files/the_ocean_and_climate_change_issues_brief-v2.pdf



effects on marine ecosystems at global and local scales, with some of the patterns already being observed³ including:

- Range shifts of many marine species to more northern latitudes and higher altitudes
- Population explosions and crashes causing ecosystem imbalance and further species diversity decline
- Changes in ocean chemistry affecting survival rates of calcifying organisms including commercially important shellfish
- Increase in severe weather events leading to increased run-off from land, flooding and drought – all which have knock-on impacts to biodiversity
- Changes in the timing of natural events such as bird migrations and other phenological shifts causing lack of synchronisation between species
- Impacts arising from climate change mitigation measures, e.g., offshore wind farms on sites important for marine life
- Changes in ecosystem productivity with unpredictable effects.

Healthy, productive and resilient seas underpin human health and wellbeing as well as our economic and social structures. Therefore, given the considerable impact that climate change will have on the marine environment, and by extension, human health, wellbeing and the economy, a target of at least net zero emissions in Northern Ireland by 2045 is the only suitable option.

The Climate Change Committee (CCC)⁴ makes specific reference to the UK needing to have the ‘*highest possible ambition*’ with regard to pathways to achieving net zero. Experts now advise that net zero by 2050 is not enough to avoid a climate crisis as this only gives a 50% chance that such action will keep average global warming to 1.5°C or below⁵. It is crucial we do everything we can to limit global warming to 1.5°C. Such advice is now reflected by many other organisations and Governments committing to net zero by 2045 or sooner (e.g., the Climate Change (Scotland) Act 2019, National Farmers Union ‘Net zero by 2040’ across England and Wales, and the Northern Ireland Private Members Bill on climate change).

The CCC’s Independent Risk Assessment⁶ published in June 2021 states that even if the international community meets the goals of the Paris Agreement, further climate change will occur and hence will require adaptation. We acknowledge that the CCC’s scenarios for the UK’s Sixth Carbon Budget do not include one where Northern Ireland could reach net zero greenhouse gas emissions by 2050 (or by 2045). Critically however, the CCC acknowledge that ‘*there is no purely technical reason why net zero is not possible in Northern Ireland*’⁷ and this does not mean that such a target could not be

³ https://portals.iucn.org/library/sites/library/files/documents/2016-046_0.pdf

⁴ <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

⁵ <https://www.ipcc.ch/sr15/>

⁶ <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf>

⁷ <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-NetZero.pdf> (p 230)



achieved using devolved policy actions. It is therefore imperative that Northern Ireland makes the best use of such devolved policy areas.

A net zero target by 2045 also represents a truly global outlook, which acknowledges the role small developed countries should play in dealing with the Climate Emergency.

Q2: Do you agree with the proposed vision of “net zero carbon and affordable energy” for the Energy Strategy?

NIMTF agrees with the proposed vision of “net zero carbon and affordable energy” for Northern Ireland.

In this section, the strategy also states that *‘Net Zero Carbon Energy Net zero carbon energy means that we will remove almost all carbon dioxide (CO2) emissions from energy-related sectors. **Some CO2 will still be produced but can be offset by planting trees or capturing carbon and storing it or using it**’*. NIMTF would strongly suggest that the strategy broadens the scope of ‘Nature Based Solutions’⁸ to include more than tree planting. A recent blue carbon study⁹, led by Ulster Wildlife, highlighted the importance of Northern Ireland’s coastal and marine habitats in helping to tackle the climate and nature crises, and achieve net zero greenhouse targets. More specifically, the report found that:

- More than half of the estimated current extent of the coastal blue carbon habitats occur within Northern Ireland’s inshore Marine Protected Area (MPA) network. This means there is a significant opportunity to effectively protect these carbon sinks through implementation and enforcement of effective and enforced MPA management plans.
- There is the potential to triple the estimated blue carbon sequestration rate of the inshore MPA network through habitat restoration and creation.
- Partnership working and knowledge sharing is essential for habitat restoration programmes in order to access the expertise, funding and resources required for success.

A cross-department blue carbon strategy is needed for Northern Ireland, integrating blue carbon protection and recovery into climate change mitigation and adaptation plans and policies (such as this Energy Strategy and any subsequent climate legislation) as part of a wider approach to meet net zero targets.

Q3: Do the five principles identified provide clear direction around the approach that we want to take with the Energy Strategy?

⁸ <https://www.naturebasedsolutionsinitiative.org/what-are-nature-based-solutions/>

⁹ <https://www.ulsterwildlife.org/sites/default/files/2021-05/Blue%20Carbon%20Habitat%20Restoration%20in%20Northern%20Ireland%20-%20A%20Feasibility%20Study.pdf>



NIMTF strongly suggest that a 6th principle is included: **Plan for biodiversity**; this will provide clear direction on the Energy Strategy’s approach to minimising the impact of energy creation on the environment. Decisions taken now must ensure that development takes place in a way that is consistent with NI’s long-term public interest in maintaining a healthy, functioning marine environment. ‘Planning for biodiversity’ objectives must safeguard nature, promote nature-inclusive design, and further the conservation of biodiversity.

Decarbonising our economy and energy sector is critically important, not only for tackling climate change but addressing the biodiversity and ecological emergency. However, this change in strategy for NI, will ultimately drive new development and infrastructure, inevitably impact on nature, including at sea. This potential environmental impact of installing and maintaining renewable energy infrastructure is especially relevant to the marine environment considering the UK Government commitment to installing 40GW of offshore wind by 2030¹⁰, and the Energy Strategy’s ambition of developing ‘a targeted action plan to bring forward offshore and marine renewables in Northern Ireland’.

NIMTF are not opposed to marine renewables and believe such technologies should play a part in providing NI with a sustainable renewable energy base. However, action to tackle climate change should not be at the expense of wildlife. To avoid damage to wildlife and delay in the delivery of low carbon energy to meet net zero by 2045, future development at sea must use the right technology in the right location. For developments and technologies for which there is less certainty about the full extent of environmental impacts, the precautionary approach should be applied in which the integrity of NI’s MPA network and Good Environmental Status as defined by the Marine Strategy UK are prioritised.

Solutions to the climate emergency must not drive further declines in the health, productivity, and biological diversity of our seas. A fit for purpose spatially prescriptive, ecosystem based marine plan for NI is needed to resolve issues regarding best placement of marine renewable projects and the competing demands on our seas.

Northern Ireland must learn lessons and adopt suitable policies from other parts of the UK where the renewable sectors are more developed and experienced. NIMTF strongly recommend NI adopts a similar ambition as that outlined in Natural England’s recent report ‘Approach to Offshore Wind: Our ambitions, aims and objectives’¹¹. It calls for new offshore wind farms to leave nature in a better state than before and avoid any irreparable damage to the environment.

Q4: Are there any key delivery priorities for the Energy Strategy not captured? If so, please outline what you believe should be included.

NIMTF strongly suggest that an additional key delivery priority is included - Biodiversity conservation: ensuring energy generation planning is well informed, organised and implemented in a way that ensures Northern Ireland’s biodiversity is adequately safeguarded and enhanced. We

¹⁰ <https://www.gov.uk/government/news/new-plans-to-make-uk-world-leader-in-green-energy>

¹¹ <http://publications.naturalengland.org.uk/publication/5400620875120640>



believe that the system of planning and governance to bring about renewable energy generation should actively promote conservation, enhancement, restoration and expansion of biodiversity. Early dialogue with stakeholders and inclusive decision-making will be key to identifying and mitigating potential spatial conflicts. Please see NIMTF response to Q3 for more details on why this is important.

Q14: Do you agree with the economic growth opportunities identified within renewable energy? What supporting policies do you believe are needed to take advantage of these?

NIMTF are not opposed to marine renewables and believe such technologies should play a part in providing NI with a sustainable renewable energy base. However, action to tackle climate change should not be at the expense of wildlife. To avoid damage to wildlife and delay in the delivery of low carbon energy to meet net zero by 2045, future development at sea must use the right technology in the right location.

Therefore, NIMTF broadly agree with the economic growth opportunities identified within the renewable energy sector. However, vital supporting policies to deliver on the Strategy's ambitions regards renewable energy creation, must incorporate a programme of work to identify and address evidence and ecological evidence gaps regarding their environmental impact. This would in turn, inform a strategic monitoring programme of impacted habitats and species, as well as the development of appropriate environmental principles such as how compensation, mitigation, net gain¹², project decommissioning and cumulative effect may be delivered.

Furthermore, a strategic approach to the placement of offshore renewable energy projects and subsequent cabling must be given due consideration from an early stage and be informed by a spatially prescriptive, fit for purpose NI marine plan which puts the environment at the forefront of all policy and decision making.

Q35: Do you agree with setting a 70% renewable electricity target by 2030, whilst retaining the flexibility to increase this to 80%?

NIMTF agree with setting an ambitious as possible renewable energy electricity target for NI by 2030. The Climate Change Committee (CCC)¹³ makes specific reference to the UK needing to have the '*highest possible ambition*' with regard to pathways to achieving net zero. High levels of electrification using renewable generation sources is key to this. Experts now advise that net zero by 2050 is not enough to avoid a climate crisis as this only gives a 50% chance that such action will keep

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909269/ncc-advice-net-environmental-gain.pdf

¹³ <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>



average global warming to 1.5°C or below¹⁴. It is crucial we do everything we can to limit global warming to 1.5°C.

Q36: Do you agree with the criteria identified that would allow in order to consider any future increases in the renewable electricity target?

- a) Projects can be delivered in a cost-effective manner.
- b) Offshore wind can be delivered by 2030.
- c) Storage technologies can minimise system curtailment of renewables.
- d) Greater clarity on electricity demand for heating and transport.
- e) Consumers' bills are not disproportionately impacted.

If not, what alternative criteria might be used?

NIMTF agree that marine renewable technologies should be a part of NI's future energy base mix. However, as with any activity or development at sea, their expansion will bring about a greater risk of having detrimental impact on the environment. Therefore, additional criteria should state that renewable projects should not have a detrimental impact on wildlife and ensure that the delivery of low carbon energy is using the right technology in the right place; avoiding, mitigating and compensating environmental and cumulative risks and impacts as far as possible.

Northern Ireland must avoid the situation whereby the expansion of renewable energy development offshore begins to adversely affect individual MPAs or the network as a whole. A range of MPAs on the East coast of England are already in unfavourable condition due to offshore wind farm development or at risk from this activity. (e.g. (i) *Haisborough, Hammond and Winterton SAC*¹⁵ Condition assessment by Natural England states that the whole site is 100% in unfavourable condition, with offshore wind farm cables contributing to a loss of habitat within the site. (ii) *Inner Dowsing, Race Bank and North Ridge SAC*¹⁶ As above, condition assessment by Natural England states that that the areas which have been assessed are in unfavourable condition, with offshore wind farm located within the site contributing to a loss of habitat. (iii) *The Wash and North Norfolk Coast SAC*¹⁷ Condition assessment by Natural England states that the site is at risk from offshore wind farm cable installation).

Not only is it important to take environmental issues into consideration early on in the planning process to protect the environment, but it will also help avoid lengthy delays in developers gaining

¹⁴ <https://www.ipcc.ch/sr15/>

¹⁵ <https://designatedsites.naturalengland.org.uk/MarineCondition/publicFeatures.aspx?SiteCode=UK0030369&SiteName=hais&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=>

¹⁶ <https://designatedsites.naturalengland.org.uk/MarineCondition/publicFeatures.aspx?SiteCode=UK0030370&SiteName=inner%20dowsing&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=>

¹⁷ <https://designatedsites.naturalengland.org.uk/MarineCondition/publicFeatures.aspx?SiteCode=UK0017075&SiteName=wash&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=>



planning approval. For example, in England, a recent High Court decision overturned planning permission for the Norfolk Vanguard windfarm after an already lengthy delay in development, due to the failure to account for environmental impacts of the project¹⁸.

Q37: Do you agree that we should explore with BEIS the possibility of extending the Contracts for Difference scheme to Northern Ireland? If so, what terms would be needed to ensure generation in the region whilst protecting consumers?

NIIMTF realises that the Contracts for Difference (CfD) scheme is likely pivotal to attracting the investment and marine renewables development opportunities which will help NI meet its net-zero and climate targets in the future. This is certainly the case for other regions of the UK. However, such policies or schemes to attract investment in marine renewables must be accompanied by clear guidance from NI Government regarding its commitment, and requesting the commitment of potential marine renewable developers, to key environmental principles, including the broad principle of no environmental regression. More specifically, it should propose how issues such as strategic site and cabling placement, cumulative impact, mitigation and compensation, net gain¹⁹, and decommissioning are to be addressed.

Furthermore, any expansion of marine renewables in NI, needs to be clear on how targets and criteria integrate with existing and future policy such as the Marine Act (Northern Ireland) 2013²⁰, Conservation of Habitats and Species Regulations 2017, The Marine Strategy Regulations (2010), Strategy for Marine Protected Areas in the Northern Ireland inshore region (2014), as well as the impending NI Climate Bill, Biodiversity Strategy, and Environment Strategy.

Q38: Do you believe it is possible that an offshore wind project in Northern Ireland could be operational before 2030? If so, please outline what targeted actions could be taken to deliver this.

NIIMTF does not have the knowledge or expertise to assess whether an offshore wind project in NI could be operational before 2030. However, whether it is possible or not, all environmental issues such as strategic site and cable placement, cumulative impact, mitigation and compensation, net gain²¹, and decommissioning must be fully considered and appropriately addressed before planning permission is granted. Not only is it important to take environmental issues into consideration early on in the planning process to protect the environment, but it will also help avoid lengthy delays in developers gaining planning approval. For example, in England, a recent High Court decision overturned planning permission for the Norfolk Vanguard windfarm after an already lengthy delay,

¹⁸ <https://www.bbc.co.uk/news/uk-england-norfolk-56115137>

¹⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909269/ncc-advice-net-environmental-gain.pdf

²⁰ <https://www.legislation.gov.uk/nia/2013/10/contents>

²¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909269/ncc-advice-net-environmental-gain.pdf



due to the failure to account for environmental impacts of the project²². Lessons must be learned from other parts of the UK to avoid this situation arising in NI.

Q39: Do you believe that a fixed platform offshore wind project should be targeted to be part of the renewable generation mix? If so, how would you propose some of the challenges associated could be overcome?

NIMTF believe the energy base mix for NI should be diverse to improve resilience. The principal consideration when choosing which renewable energy technologies should be used at sea or land, is their impact on the environment, and how we can appropriately manage those impacts.

Q40: Do you believe that floating platform offshore wind offers the best long-term opportunities for offshore wind in Northern Ireland’s waters? If so, what additional steps could be taken to encourage these projects?

NIMTF believe the energy base mix for NI should be diverse to improve resilience. The principal consideration when choosing which renewable energy technologies should be used at sea or land, is their impact on the environment, and how we can appropriately manage those impacts.

Floating wind energy generation is a newer technology and therefore the potential environmental impacts are lesser known which may present a higher degree of risk to habitats and wildlife at sea. Underpinned by the precautionary principle, a comprehensive programme of research and investigation into floating wind (and other emerging renewables) and its environmental impact must inform and guide strategic decisions on the composition of different technologies to the NI energy base mix. It is the view of the NIMTF that timely and sustainable low carbon development will only be possible if informed by evidence-based, strategic, ecosystem based marine planning that integrates climate and nature objectives. To realise this, space must be provided, both physically (for multiple technologies) but also in relation to the cumulative interrelated pressures which may occur. The success of new, innovative technologies will require increased collaboration between governments, stakeholders and researchers to ensure positive outcomes for low carbon energy in a sustainable and timely way.

Q41: Do you believe that other marine renewables can play a key role in our renewable generation mix? If so, please identify what technologies offer the greatest potential and what steps can be taken to support these.

NIMTF believe the energy base mix for NI should be diverse to improve resilience. The principal consideration when choosing which renewable energy technologies should be used at sea or land, is there impact on the environment, and how we can appropriately manage those impacts.

²² <https://www.bbc.co.uk/news/uk-england-norfolk-56115137>



Underpinned by the precautionary principle, a comprehensive programme of research and investigation into any emerging renewable technologies and their environmental impact must inform and guide strategic decisions on the composition of different technologies to the NI energy base mix.

Q42: Do you agree that a strategic approach to planning the location of renewable projects should be taken? If so, please outline practical steps that could be taken to deliver this.

NIMTF are not opposed to marine renewables and believe such technologies should play a part in providing NI with a sustainable renewable energy base. However, action to tackle climate change should not be at the expense of wildlife. To avoid damage to wildlife and delay in the delivery of low carbon energy to meet net zero by 2045, future development at sea must use the right technology in the right location.

Practical steps to bring this about include:

- Future low carbon energy production activity, can only take place within ecological and environmental limits based on an individual and cumulative development basis.
- All future planning for marine renewables must incorporate the impact on existing and any potential future designations (Area of Search) in the MPA network and Good Environmental Status in decision making.
- Appropriate assessment of ecological impacts and alongside high-quality management of effects are needed.
- A coordinated approach to growing the marine renewable industry in NI is needed, including strategic and spatially descriptive and ecosystem based marine planning which will inform project placement.
- Environmental principles and issues such as strategic site and cable placement, cumulative impact, mitigation and compensation, net gain, and decommissioning must be fully considered and appropriately addressed before planning permission is granted.
- Underpinned by the precautionary principle, a comprehensive programme of research, investigation and long-term monitoring into any emerging renewable technologies and their environmental impact must inform and guide planning decisions and policy.

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