



**Chambers  
Ireland**  
Advancing business together



# Chambers Ireland submission to the Department of the Environment, Climate and Communications on the Draft Terms and Conditions for the First Offshore Competition under the Renewable Electricity Support Scheme ORESS 1

December 2021

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

In September 2019, our Network pledged to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and

communities (SDG 11), advancements in gender equality (SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).<sup>1</sup>

We use these Goals as a lens for interpreting and prioritising our policy proposals. The issue of offshore renewable energy is particularly important to our Network as it is a critical element to our national climate action response. As Chambers Ireland outlined in its white paper on maximising the benefit of developing the national wind energy industry and the national grid<sup>2</sup>, the Irish business community is deeply interested in our national potential to develop an offshore renewable energy industry, and offshore wind in particular.

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<sup>1</sup> The Chambers Ireland SDGs. Available at: <https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/>

<sup>2</sup> Chambers Ireland white paper on maximising the benefit of developing the national wind energy industry and the national grid. Available at: <https://www.chambers.ie/wp-content/uploads/2021/01/Chambers-Ireland-white-paper-on-maximising-the-benefit-of-developing-the-national-wind-energy-industry-and-the-national-grid.pdf>

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## Chambers Ireland's Perspective on Offshore Renewable Energy

As the impact of climate change has become ever more obvious, Chambers Ireland has become more active in calling for action in this area.

Even if this was not something which we needed to do to meet our commitments to reduce our CO<sub>2</sub> emissions, it is something that we ought to be doing as a country because of the myriad benefits:

1. Offshore wind has the capacity to transform our economy by helping us become a net exporter of electricity.
2. The operations and maintenance associated with offshore windfarms have the potential to bring thousands of high-quality, highly skilled, highly paid jobs to our economically disadvantaged regions for several decades.
3. Early engagement with the challenges associated with deep-water floating platforms will allow us to nurture a high-technology capital intensive and highly skilled industry that has growth potential over generations to come.
4. The European Green Deal is ideally timed to allow us to access cheap capital at quantity over the coming decade.
5. The abundance of energy at a zero marginal cost creates huge opportunities for the hydrogen industry.
6. In increasingly politically turbulent times, it will offer us energy security by removing the political risk that we suffer as a result of being at the edge of Europe, and at the end of very long supply chains.

The positions have been developed by the Chambers Ireland Network through our submissions on the Wind Energy Development Guidelines<sup>3</sup>, the Commission for the Regulation of Utilities consultation on Price Review Five<sup>4</sup>, Grid Development Policy for Offshore Wind<sup>5</sup>, our Budget Submissions for 2022<sup>6</sup> and for 2021<sup>7</sup>, our General Election 2020 Manifesto<sup>8</sup>, and various events and symposia which we have co-ordinated to raise the salience of climate action.

The development of our offshore renewable energy industry is one of the greatest economic opportunities for our country since we joined the European Economic Community. With over \$5 trillion in investment in offshore renewables expected over the coming decade<sup>9</sup>, the bulk of which will be in green hydrogen and wind energy, for the current administration a nationally critical task for the coming years will be facilitating our access to the coming green energy boom.

If successful, such a legacy project would see Ireland become energy self-sufficient in the first instance, it will allow us to export excess energy to the European grid and will also allow us to take prominent position in nascent industries such as deep-sea offshore windfarm construction, while also allowing us to be first movers in the skills intensive offshore platform industry. It will give us a foothold in the export of green energy derived hydrogen/ammonia which will have the secondary benefit of reducing the carbon emissions of domestic industries such as farming through offering clean alternatives to fossil fuel derived fertilisers, while also helping other states decarbonise through the substitution of green energy alternatives for industries such as aviation, shipping, transport, steel production, etc. which require energy dense alternatives to the fossil fuels which they have a dependence on.

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<sup>3</sup> <https://www.chambers.ie/wp-content/uploads/2020/02/Chambers-Irelands-submission-for-the-Public-Consultation-on-the-revised-Wind-Energy-Development-Guidelines.pdf>

<sup>4</sup> <https://www.chambers.ie/wp-content/uploads/2020/09/Chambers-Irelands-submission-for-the-Public-Consultation-on-Price-Review-5-Electricity-Networks.pdf>

<sup>5</sup> <https://www.chambers.ie/wp-content/uploads/2020/08/Chambers-Irelands-submission-for-the-Public-Consultation-to-Inform-a-Grid-Development-Policy-for-Offshore-Wind-in-Ireland.pdf>

<sup>6</sup> <https://www.chambers.ie/wp-content/uploads/2021/07/Chambers-Ireland-Pre-Budget-Submission-for-2022.pdf>

<sup>7</sup> <https://www.chambers.ie/wp-content/uploads/2020/09/Chambers-Ireland-Budget-Submission-2021-September.pdf>

<sup>8</sup> <https://www.chambers.ie/wp-content/uploads/2020/01/Chambers-Ireland-Election-Manifesto-2020.pdf>

<sup>9</sup> Morgan Stanley Utilities Research Note 10 Nov 2020 "Energy Transition Titans: Big Oil's Big Threat Is Overblown"

## Concerns regarding the Climate Action Plan targets, and the revised EU 2030 emissions targets

If we are to meet our revised 2030 emission targets, we will have to reduce our total emissions by in excess of 20 million tons of CO<sub>2</sub>. The national Climate Action Plan aims to see half of that reduction arise through the migration of our electricity supply generation system to renewables. Half of that decline is to come from the increase in electricity generation using onshore wind. To increase the generation capacity of this sector we will need to double the scale of our onshore wind turbine fleet. Simultaneously we will need to create an offshore fleet which has a greater capacity than the entirety of our current onshore wind generated electricity supply.

Under the 2021 Climate Action Plan (which aims at making a 51% reduction in CO<sub>2</sub> emissions as part of the policy that has been endorsed by the European Council<sup>10</sup>) the Irish fleet of onshore wind turbines would have had to more than double in capacity from 4GW to 10GW in the coming years. The 2020 programme for government “Our Shared Future”<sup>11</sup> envisages the creation of an offshore wind energy industry that will have expanded to supplying 5GW (larger than our current total land fleet) of electricity by 2030. However, **many of the projects which are in development may be unable to progress due to regulatory impediments in the planning process.**

The ambition for wind in Ireland over the coming decade is enormous as it requires us to more than treble the size of our wind energy production industry, adopt new technologies to the Irish electricity grid, and upgrade/reinforce/build huge amounts of transmission equipment to bring the renewable energy from where it is generated to where it is needed. This effort requires a

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<sup>10</sup> [European Council meeting \(10 and 11 December 2020\) – Conclusions](#)

<sup>11</sup> [Programme for Government: Our Shared Future](#)

regulatory regime that supports that ambition to the fullest extent, and unfortunately our current regulatory system inhibits this. **The chief hindrance to meeting our climate goals is the absence of a planning system that facilitates offshore windfarm development. This needs to be the top priority at all levels of administration.**

While it is welcome that we are finally moving towards the ORESS 1 process it cannot be ignored that our planning system failed in its service of our nation, with regard to offshore wind, in 2007. It took over six years for our administrative and parliamentary system to attempt to remedy the legal lacuna that the offshore-wind industry was in. Almost nine years later we are still waiting for primary legislation to facilitate an offshore wind industry. We are attempting to commence the ORESS 1 process without a planning regime in place. We are still awaiting the introduction of an Environment and Planning Court, legislation for which is still awaiting introduction in the Oireachtas and is not planned for such until Q4 2022. Given the typical hurdles to legislation this Bill is unlikely to be enacted before 2024 which makes the operation of the Environment and Planning Court and unlikely event before late 2025. The government also plans to introduce new Judicial Review legislation before the end of 2022. This proposal however is likely to receive legal actions against it to test its constitutionality, and will eventually, inevitably, be challenged in the European Court of Justice to ensure its compliance with the Aarhus Convention and other international commitments.

Beyond planning, within the Chambers Network there are concerns regarding the excessively conservative perspective within the CRU when it comes to ensure that Ireland can benefit from the potential that we have to take advantage of our offshore renewable energy resources. There is a lack of consideration within the DSO/TSO that at least some offshore renewable energy sources may not be used within the transmission and distribution networks and could instead be used to supply energy into our nascent green hydrogen and green ammonia industries. We seem to have worked our way into a position where we have the worst of all

worlds. Not only have we missed out on 15 years of offshore wind generation (and the consequent climate burden those innumerable MWh of CO<sub>2</sub> emissions have caused), we are also slow to adopt and adapt now mature technologies into our energy mix.

## **Key Energy Considerations regarding offshore wind for the Chambers Ireland Network**

### **Energy security is a principal concern for our membership<sup>12</sup>**

Sourcing our fuels from countries that are politically unstable imports political risks into our economy. We need to ensure that Ireland has a resilient energy supply which can sustain economic, social, political, and environmental shocks.

**Wind – and in particular offshore wind –has a potentially enormously positive role to play in sustaining our economic future if we bring in effective regulations to support the industry’s development.**

This shift to renewables will need to be married to a programme of energy security contingency planning that provide assurance that should failovers occur, sufficient electricity supply remains available to the network.

### **Climate change**

Climate change has become an unavoidable risk, and one with unbounded potential maximum costs - we cannot predict how much climate change will cost

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<sup>12</sup> Security of Supply was the most important priority for our members when surveyed earlier this year  
[https://www.chambers.ie/wp-content/uploads/2021/07/EirGrid-Chambers-Ireland-Workshops-\\_final.pdf](https://www.chambers.ie/wp-content/uploads/2021/07/EirGrid-Chambers-Ireland-Workshops-_final.pdf)



our economy. However, by shifting to renewably sourced energy we can reduce the damage to the environment which we are yet to do. Our geographic location, and with it the large area of the Atlantic which lies within our sovereign territory, will allow Ireland to participate in the European Union's decarbonisation mission through the exportation of our excess watts. **Ireland has unfortunately delayed the readying of a regulatory regime which could facilitate the generation of offshore wind energy by a decade already, it is vital that we rapidly make progress in reducing our burden on the environment.**

## Competitiveness

Energy costs for Irish business were significantly higher in 2019 than for their competitor businesses in the other EU-28 states<sup>13</sup>. Given the large amount of available capital, the unprecedented low interests rates, and the creation of the European Green Deal Investment Plan, **this is the best moment to build capital intensive infrastructure, such as offshore windfarms, had we the regulatory regime to nurture them**, and to do so while minimising the cost impact for the consumer.

## Export opportunity

With secular and technological change inducing significant disruption to global trade, and with this process being accelerated by the Covid-19 crisis, the exportation of offshore wind-derived energy should be a key part of the government long-term economic strategy for the State. With numerous proposed changes to international taxation regime likely to have a marked impact on government revenues **there is a great opportunity for Ireland to benefit from**

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<sup>13</sup> <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/prices/>

**supplying electricity to other European Union member states at zero marginal rates.** Further, as the technology matures, Ireland has the opportunity to use excess wind derived electricity to support hydrogen production which can also have the benefit of replacing the CO<sub>2</sub> emissions that heavy goods vehicles, home heating, and our current generation of gas turbines are producing.

## Regional growth and industrial development

While our domestic demand for electricity is largely focused on the Greater Dublin Area, the vast majority of our wind-derived energy potential will come from more economically disadvantaged areas. This means that the wind sector creates opportunities with multiple, reinforcing, positive effects. The maintenance and servicing of offshore windfarms is both highly skilled and labour intensive. SSE's Beatrice field<sup>14</sup>, off Scotland, is 588MW and will require 90 employees to maintain it through the 30 year+ lifespan of the windfarm. With the Programme for Government targeting 5GW of electricity generation offshore, ten of our coastal towns on the east and south of the country can expect to become the centres for jobs like these. Combining the high-multiplier regional effect and the wage levels associated with highly skilled engineering work, offshore wind has the potential to breathe life (and hundreds of jobs) into these small, regional towns.

When floating turbine technology matures, we can expect that the west coast will see ten times as many towns benefitting from the maintenance and servicing of windfarms. We also have a narrow window where it may be possible to upgrade at least one of our deep-water ports along the east or south of the country so that they can be the focus for the construction efforts for these new windfarms there. If we fail to commence the upgrading of an Irish port then it is likely that

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<sup>14</sup> [Beatrice Offshore Windfarm Limited project Socio-economic impact report, July 2017](#)

the construction of the windfarms in Irish waters will be conducted largely out of France, or out of an English port, with a double effect: Firstly, we will not benefit from the employment opportunities that are associated with construction which will have an immediate impact on GNI\*. Secondly, we risk not having sufficient infrastructure and industry to support the Atlantic windfarms once they commence construction in the post-2030 period. Thirdly, we raise the expense of construction in Ireland relative to other countries as Irish offshore construction will incur additional transport costs (from France) or political and tariff risks (England).

This absence of an Irish construction base will gravely reduce the long-term economic benefits that will be associated with the wind-energy industry.

**Offshore wind has the potential to transform the economies some of our most disadvantaged towns and regions, reducing the economic burden on our cities while also fuelling the growth of our economy.**

Consequently, it is clear to the Chambers Ireland Network that our island needs an ambitious and immediate programme of action from government to ensure that we will be able to deliver on our potential.

Unfortunately, our long-standing inability to create a regulatory framework that can support offshore wind has caused significant damage to our international reputation. While some organisations within the Irish energy ecosystem may characterise the loss of a firm like Equinor as irrelevant given the scale of the global financing market for offshore renewables, this is a misguided and parochial perspective. The Maritime Area Planning Bill 2021 is still being amended in the Oireachtas. A bill which is as complex as this will receive significant challenge

within our courts system and will likely be amended repeatedly before the first offshore wind farms are completed.

While ORESS 1 acknowledges this and tries to balance the risks associated with offshore wind between the state and the developers, the most significant risk element is entirely within the purview of the state, our planning and legal systems. Should those areas of public administration fail again in their delivery, Ireland's reputation, and so our opportunities will suffer greatly yet again. It is vital that ORESS 1 is a success and government should consider whether it would be appropriate to create a cross-departmental super-junior ministerial role to ensure that the urgency that is needed is applied to the delivery of our renewable energy potential.

## **Chambers Ireland's responses to the specific elements of the consultation**

Our primary observations are that while ORESS 1 is a welcome step towards finally developing an offshore energy sector, it is extremely exposed to planning issues. Given the immaturity of the sector in Ireland the ORESS 1 auction will be hindered by our reputation for poorly regulating and administrating the development of offshore renewables. Given the idiosyncrasies of the Irish auction it will be likely that only developers that have large risk appetites will participate. This will make finding developers willing to consider development in Irish waters more difficult, which will ultimately result in poorer value for the customer. It also raises the risk that firms will speculatively enter the auction to win bids only to flip them if successful at the planning stage, creating a greater risk of volume drop-off. There will be significant issues with future auctions if those that win within the ORESS 1 are not successful at delivering generation. Also given that planning delays in Ireland typically delay projects considerably we are

concerned that long delays for planning objections are not adequately dealt with within ORESS 1.

## **Eligibility Criteria**

It is good that Grid Connection Assessment criteria will be an option when applying to ORESS 1, but this occludes significant risk which is not within the capacity of developers to control. Planning consent will be an inevitable issue, and the associated legislation has yet to be enacted, never mind tested within the courts.

There is also the difficulty that the Grid Connection Assessment will become the de facto mechanism for choosing which developers can bid, as every bid will have been made contingent upon a pre-existing agreement between the developer, the DSO, and the TSO. It may also be the case that the optimum solution might involve multiple developers using a particular connection node on the network, but an existing GCA for a development may stymie the creation of a more complex, if more efficient, option.

It would be useful if existing transmission grid infrastructure, such as the transmission lines which service thermal plants could be paired with offshore energy projects. The hybrid model would be useful addition to the energy mix as these are likely to be anti-correlated in terms of usage and load i.e., those times when offshore energy projects are delivering generation will be those times when there will be the least demand for energy production from thermal plants.

## **State Consent**

Chambers Ireland cannot underplay our concerns regarding the 'State Consent' elements of this process. The greatest single risk to developing our offshore renewable energy potential is our planning administration system. The 21 month timeframe which is proposed for bridging the

gap between successfully acquiring a Marine Area Consent and the granting of planning permission seems to be wildly optimistic.

## **Bidding Independence**

The proposed bidding independence rules seem reasonable.

## **Indexation**

Chambers Ireland welcomes the inclusion of an indexation process, but also notes that indexation criteria are very sensitive to the timelines over which real present value is estimated. Also, we are currently within a time of transition regarding both material cost, which is likely to greatly affect the capital element of the cost structure and also labour competition which will significantly affect the operations and maintenance elements of the projects.

Secondly, while the 2% target for inflation may be appropriate for labour intensive elements, construction costs typically exceed 7%. Also, in light of the considerable government spending that will arise out of programmes such as Housing for All and the National Development Plan there will be considerable competition for construction services throughout the ORESS 1 time period which will inflate the cost of these projects beyond the baseline scenario.

Accepting those modelling limitations, the KPMG analysis of the Dunkirk project seems a reasonable approach.

## **Auction Mechanisms**

Chambers Ireland doesn't have a view on the appropriate auction mechanism.

## Bid Bonds and Performance Securities

Chambers Ireland doesn't have a view on the appropriate auction mechanism.

## Interim and Final Milestones

It is likely that planning consent will be the most variable and challenging element of the project timelines. Every project that succeeds in winning a bid on ORESS 1 should plan for a judicial review. It is unlikely that by the time the projects will be moving through planning that the Environmental and Planning Court will be in place. Furthermore, even if proposed judicial review legislation has been enacted it will suffer from repeated constitutional challenges. It would be ideal if the test cases involved were for projects other than ORESS 1 projects, however that cannot be ruled out.

Should such legal hurdles need clearing, this will add considerably to the time that will be taken to deliver these projects.

The department should consider whether the application for planning permission is a more appropriate milestone, as that is within the ability of the developer to control. Should a development be delayed as a result of congestion within the high court, it would be inequitable for the developer in question to be exposed to the entirety of the burden.

If it is hoped to deliver these projects in a timely fashion, then An Bord Pleanála and the National Parks and Wildlife Service will need to continue the expansion of their upskilling and recruitment programmes. The Department of Justice will need to expand the number of justices available to the courts, and it needs to create a dedicated Environmental and Planning Court with the greatest urgency. Consideration should be put to delaying the judicial review legislation as that would create extra uncertainty within the planning process. While the current review legislation process is potentially open to abuse, a new one likely needs to be tested

constitutionally and ultimately will need to be reviewed in the EU Court of Justice. The problems with the current system are known, and the case law is settled, so by applying greater resources to the task of hearing cases, it is likely that significant inroads can be made in dealing with the planning related caseload of the courts. It is often the case with innovations in planning, such as Strategic Housing Developments, which attempt to optimise the planning process by creating systems for bypassing known bottlenecks in the system, encounter novel problems which ultimately need higher courts to make decisions about the appropriate application of the law, and this in turn creates even longer delays than the process was attempting to avoid.

Consequently, it would be useful if the programme clock could stop ticking when a judicial review into a project has been instigated. Also given the considerable risk that planning will cause for all projects that are successful in winning an ORESS 1 bid, it would be important that an exit clause be available for these projects, should they fail at the planning stage.

## **Offshore Community Benefit Funds**

Chambers Ireland is greatly concerned about breaking the link between the developer and the local community. While it is obvious that certain economic players, such as the fishing community, may experience direct harm as a result of the works that are required to create offshore energy generation capacity, most of the disadvantage will be experienced on the ground close to the individual sites. Communities may feel as though their utility of the seashore is diminished. The hospitality sector may feel that if their revenues decline this could be as a result of the presence of offshore windfarms, sometimes they may even be correct. Communities that experience direct disruption as a result of construction of grid connection works will also resent the works which they will see as being carried out for the benefit of others.



A useful element of the current system is that where community sentiment intrudes into the development process then resources can be quickly applied to resolve issues and constraints before they have time to mature.

Individual developers are very motivated to ensure that communities have a high degree of social acceptance, and the flexibility to understand local social and political constraints. It seems unlikely that a centralised national body would have the same granular understanding on the ground, and indeed could be prevented from using benefit funds strategically leading to the perception that the primary beneficiaries of the Community Benefit Funds are those who get to administer them.

## **Early Contributions**

It is Chambers Ireland's view that the proposals which relate to Early Contributions are reasonable.

## **Nationally-Managed Fund**

Chambers Ireland's position is that only a small portion of the Offshore Community Benefit Funds should be managed at the national level.

It is not always apparent that issues have emerged within a particular community. By their nature these issues will be idiosyncratic and can arise simply because of local inter-personal relationships and rivalries. In other infrastructure projects, such as the EirGrid transmission network upgrades ten years ago, local agitation was stoked from Tipperary to Dublin, and from Monaghan to Laois through anti-pylon protests that were funded by a small number of

individuals in Kildare. The consequences of those campaigns currently undermine our existing transmission network.

There is no reason to believe that similar projects to block developments will not be attempted over the course of ORESS1. It is vital that sufficient resources are available on the ground to combat problems before they emerge, and that they can be applied as flexibly as needed, wherever they are needed.

It would be impossible for a nationally managed fund to act in this way, and the absence of flexible local funding is undoubtedly going to undermine social acceptance of these projects and give the vocal minority, that are against any and all change, opportunities to stall the offshore renewable energy projects that will win ORESS 1 bids.

“Using a common scoring system for all fund applications, all communities, and all members of communities could expect an impartial and nationally consistent consideration of funding applications” is a way of guaranteeing that monies will be disbursed widely and thinly, rather than effectively.

## **Definition of the Offshore Community**

The offshore community is a useful paradigm, however only a portion of the total funds should be allocated to such communities through a national scheme. The majority of funding should be individual funds managed through “each offshore project”. Not least because certain communities will find it very easy to demonstrate imputed damages (fishers) while at the same time such funds will also be disbursed to a very narrow group of people (the boat owners). And, while it is possible that the fishing industry may receive a reduced catch as a result of the ORESS 1 projects, both the construction and operations and maintenance parts of these projects will afford these businesses new opportunities to develop new revenue streams, and to

diversify their income. The benefits of such a nationally managed fund will go to those that are best organised to benefit from the fund. The best way to ensure that they do not capture excess value through such a process is to allow developers to choose how to distribute the majority of the funding, where it is needed.

## **Contribution Scale**

Chambers Ireland's view is that the contribution scale seems reasonable.

## **State Aid**

The state aid element seems to be asking again whether a national fund is the best plan. It seems to be the best way to ensure that those who own the ships that fish in Irish waters are the ones that benefit from the Community Benefit Funds.

Offshore energy production will be a massive benefit to almost everyone who makes their livelihood from the sea as it will diversify the revenue of our ports, and those who work on our shipping fleet.

However, the ownership of our fleet is very narrow, and while they may have fishing stock removed from their available catch, because of state action, and so may need to receive compensation, Chambers Ireland is very concerned that non-economic actors and communities may find it challenging to compete. Furthermore, there are questions about how significant the net impact of an offshore renewable energy industry will be for the sector. It is likely to have an effect on individual businesses, but it will also impact the broader seashore communities positively as they will have the option to work in the offshore energy industry. The people most likely to benefit from the industry are those that have the skills to work on the sea. There is

considerable skills overlap between what the fishing industry demands, and what an offshore renewable energy industry will need.

Fishers are famous for badly managing maritime resources. Overfishing occurs wherever it is not actively policed. It is likely that should offshore renewable energy sites become de facto no fishing zones, then the areas around them will become richer in terms of catch than had the entirety of the domain continued to be scoured by incessant trawling.

Given the capital investment in fishing, and the organisational complexity of the businesses that own the fishing ships, it is likely that they will be capable of capturing a surplus of the benefit from the Offshore Benefit Fund, even as they benefit from becoming part of the value chain of the offshore energy industry.

## **Local Operation & Maintenance**

Chambers Ireland wholeheartedly supports the proposals regarding the location of the local operation and maintenance headquarters of the winning bids.

## **Financial Questionnaire**

Chambers Ireland does not have a view on the Financial Questionnaire.

## **Project Delivery Plan Questionnaire**

Chambers Ireland does not have a view on the Plan Questionnaire.