

Comments on Strategic Environmental Impact Assessment (SEA) for Irish Offshore Wind Energy

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Summary

The SEA recently published for Public Consultation on the website of the Department of Communications, Energy and Natural Resources (DCENR), see below, clearly does not address the requirements of Directive 2001/42/EC on Strategic Environmental Assessment.

- <http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division/Strategic+Environmental+Assessment+on+draft+Offshore+Renewable+Energy+Development+Plan.htm>

There is a complete failure to;

- Identify the projected environmental objectives and benefits of this programme;
- Consider any alternatives in which those environmental objectives and benefits could be achieved;
- Consider in the assessment on the population, the socio-economic impact on the population of the enormous financial burden of up to 4,500 MW of offshore wind and 1,500 MW of wave and tidal energy within Irish waters, in which each MW has an installed cost of over €3.5 million.

In simple terms if the two questions:

- How much does it cost and;
- Why are we doing it?

Cannot be answered and billions of taxpayers' money, through direct financial subsidies and compulsory power purchase agreements at three times the market price (€140/MWh), are being funnelled into this programme, then the implementation of this programme is completely illegal.

Strategic Environmental Assessment

Directive 2001/42/EC specifies the requirements for Strategic Environmental Assessment. In the EU Glossary of Terms¹ the principles behind a Strategic Environmental Assessment and an Environmental Impact Assessment are clearly outlined:

- **Strategic Environmental Assessment:** A similar technique to Environmental Impact Assessment but normally applied to policies, plans, programmes and

¹http://ec.europa.eu/regional_policy/sources/docgener/evaluation/evalsed/glossary/glossary_s_en.htm#Strategic_Environmental_Assessment

groups of projects. Strategic Environmental Assessment provides the potential opportunity to avoid the preparation and implementation of inappropriate plans, programmes and projects and assists in the identification and evaluation of project alternatives and identification of cumulative effects. Strategic Environmental Assessment comprises two main types: Sectoral strategic environmental assessment (applied when many new projects fall within one sector) and regional SEA (applied when broad economic development is planned within one region).

- **Environmental Impact Assessment:** Study of all the repercussions of an individual project on the natural environment. Environmental Impact Assessment is a requirement in the EU in the selection of major infrastructure projects. By contrast, Strategic Environmental Assessment refers to the evaluation of programmes and policy priorities. Environmental Impact Assessment consists of two steps: screening, which refers to an initial overall analysis to determine the degree of environmental evaluation required before the implementation is approved; and scoping which determines which impacts must be evaluated in depth. The evaluation of environmental impacts examines expected and unexpected effects. The latter are often more numerous.

The EU's: Evaluating Socio Economic Development, SOURCEBOOK 2: Methods & Techniques -Strategic environmental impact assessment, is available at:

- http://ec.europa.eu/regional_policy/sources/docgener/evaluation/evalsed/downloads/sb2_strategic_environmental_assessment.doc

This is clear in that with regard to preparation of an SEA:

- One of the purposes of the SEA is to identify the significant environmental effects of a plan or programmes and identify reasonable alternative ways of meeting the same objectives. The explicit consideration of alternative routes to the same outcome is integral to the approach.
- SEA needs to be a transparent process that allows environmental considerations to be highlighted.
- Successful SEA assesses the impacts of alternative options rather than option alternatives. The no action option has to be considered.
- There is widespread involvement of stakeholders, policy makers and the wider public.
- It helps to have an independent body to review or audit the assessment process.

Clearly two of the main steps in the preparation of an SEA are:

- The identification of the environmental and sustainable development objectives, targets and priorities which the Member State and region should achieve through the development plan.

- Draft Development Proposal and identification of alternatives - ensure that environmental objectives and priorities are fully integrated into the draft plan / programme, the initiatives to be funded, the main alternatives for achieving the given development objectives and the financial plan.

DCENR's SEA for the Offshore Renewable Energy Plan

Directive 2001/77/EC on electricity from renewable sources is clear in recital (1):

- "The Community recognises the need to promote renewable energy sources as a priority measure given their exploitation contributes to environmental protection and sustainable development. In addition this can also create local employment, have a positive impact on social cohesion, contribute to security of supply and make it possible to meet Kyoto targets more quickly".

The same approach is taken in the more recent Directive 2009/28/EC on Renewable Energy.

In my Appeal to the Commissioner for Environmental Information CEI/09/0016, I stated:

- It therefore would appear logical in terms of implementing the Directive, to compare the various technologies for generation of electricity from renewable sources against the criteria above, and develop supporting mechanisms based on the performance criteria of the different technical solutions.

I further clarified: The Community (EU) guidelines on state aid for environmental protection – OJ C 37 (2001) state:

- "The principle of prices to reflect costs states that the prices of goods or services should incorporate the external costs"
- "Member States may grant operating aid to new plants that will be calculated on the basis of the external costs avoided (...). The amount of aid thus granted to renewable energy producer must not exceed 5 eurocents / kWh".

These guidelines were updated in 2008 in which it was made clear in that the **aid is considered to be proportional only if the same result could not be achieved with less aid and the amount must be limited to the minimum needed to achieve the environmental protection sought.**

From the Decision on the Appeal CEI/09/0016² it was clarified that:

- "No strategic environmental assessment has been conducted by the Department in the renewable energy area".
- When the Department was asked whether it held any additional information on (a) a ranking system for technology alternatives in terms of their ability to meet the criteria in the Directive and (b) options to reach the objectives in legislation. The Department responded that no such information is held.

² <http://www.ocei.gov.ie/en/DecisionsOfTheCommissioner/>

Furthermore the recent Renewable Energy Action Plan for Ireland prepared for the EU Commission, see below, simply does not quantify any environmental benefits, such as greenhouse gas reductions, any alternatives considered to achieve these benefits or any details related to Public Participation.

- http://ec.europa.eu/energy/renewables/transparency_platform/action_plan_en.htm

With regard to the SEA completed by DCENR, it simply does not attempt to address any of the issues above. There is simply no indication of the costs of the programme, its objectives in terms of quantified benchmarks and any consideration of alternatives to reach those benchmarks. There is only one justification for this massively expensive programme and that is ideology.