

The Northern Ireland Renewables Industry Group (NIRIG) is a joint collaboration between the Irish Wind Energy Association (IWEA) and Renewable UK. NIRIG represents the views of the large scale Renewable Energy Industry in Northern Ireland, providing a conduit for knowledge exchange, policy development support and consensus on best practice between all stakeholders in renewable energy.

NIRIG welcomes the opportunity to respond to the Department of the Environment - Environmental Governance in Northern Ireland discussion document which sets out a number of options for review of the environmental governance arrangements in Northern Ireland.

NIRIG firmly recognises the importance of protecting our natural and built heritage, and as part of the Environmental Impact Assessment process wind farm developers already consider this protection in pursuing wind farm development, both individually and cumulatively with other applications.

NIRIG would generally be supportive of the review and reform of the Environmental Governance arrangements in Northern Ireland. NIRIG believes that the review should consider what arrangement will be most effective and efficient for Northern Ireland in the long term for the protection of our environment.

NIRIG currently has some concerns with regard to the existing Environmental Governance structure which is in place in Northern Ireland, specifically with regard to the timeliness of responses to planning applications. This delay can have a significant impact on wind farm planning applications in particular. Development of wind farms in Northern Ireland is key in order for us to meet the ambitious energy targets as set by the EU, the UK government and the NI Assembly.

Europe has set itself a target of obtaining 20% of its energy consumption from renewable sources by 2020, with the Strategic Energy Framework published by DETI last year confirming a target of 40% electricity consumption in Northern Ireland to come from renewables by 2020. Wind energy is destined to make a significant contribution to achieving these goals. Wind energy also helps to substantially reduce greenhouse gas and air pollutant emissions, as well as freshwater consumption associated with conventional power generation in the EU, all of which are significant positive actions in protecting our natural heritage.

The discussion document outlines options A-E for potential reorganisation of the Environmental Governance arrangements in Northern Ireland. Options A and B in general

look towards retaining NIEA as an Executive Agency under DoE. At present the role of NIEA as an Executive Agency as outlined in the discussion document is out of sync with environmental protection arrangements in the rest of the UK and Ireland and we would agree that reform is necessary. Options C-E outline proposals which would see the functions of NIEA transfer to an Independent Agency. NIRIG would be supportive of the concept of an independent Environmental Agency. We would consider that the most effective way to introduce this independent Agency would be through Option D – Full reorganisation - which, as stated in the document, is more in line with other regions and is in keeping with good governance. NIRIG recognises that, under this option, the transition could be long and complex and it is therefore important that whichever option is introduced, an effective transition process is implemented. Lessons could also be learned from the process that was undertaken in the other regions of the UK which led to the formation of the independent Environment Agency to ensure that the introduction of this independent agency in Northern Ireland is as effective and efficient as possible.

NIRIG hopes that our comments above are fully considered and, given the potential impact which the reform of Environmental Governance would have on the renewables industry as a whole, we would like to request a meeting to discuss our response at your earliest convenience.