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Department of the Taoiseach,
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Submitted by email to: bioeconomy@taoiseach.gov.ie
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Re: Fingleton White's response to discussion document for the preparation of a National Policy Statement on the Bioeconomy

Fingleton White welcomes the opportunity to provide input into the creation of a national policy statement on the bioeconomy. We support the development of an integrated approach to an area which currently has many sectoral strategies that may not all be aligned. We feel that the success of this national policy statement will depend on its clarity, how it ensures that all future sectoral policies are consistent with it and that all current legislative road blocks are removed.

Fingleton White provides multidiscipline engineering services for the energy industry throughout Ireland and the UK. It operates across multiple sectors including gas, CHP, biofuels, water and telecoms. To date, Fingleton White has completed projects with a capital value exceeding half a billion euro, including successfully completing a 16,000 MW gas station, 450 km of gas pipelines, 30 km of fibre network, 15 hydroelectric stations, 70 MW CHP facilities, and numerous waste-to-energy projects, industrial refrigeration systems and boiler house upgrades.

The company carries out extensive R&D and feasibility studies into the use of innovative technologies in the energy sector. Fingleton White's research covers areas such as aviation fuel pipeline, district heating, domestic CHP and the use of compressed natural gas as a virtual pipeline and as a fuel for vehicles.

1. Does the broad definition outlined adequately encompass the opportunities presented by the bioeconomy?

Yes, all the opportunities are adequately captured within the European Commission's definition.

2. How can a high-level policy statement on the bioeconomy assist in progressing the development of the priority value chains identified?

By being decisive, assigning specific responsibilities and making firm commitments.

In relation to the use of agricultural waste for bio-energy production and the use of forestry resources in decentralized heat generation, the bioeconomy policy statement needs to ensure that both the upcoming Renewable Heat Incentive (RHI) and Renewable Electricity Support Scheme (RESS) are consistent with the national policy statement as they will largely determine the future of these two priority value chains.

Local planning requirements need to support the aims of the policy statement to ensure that projects, particularly energy projects, can progress in a timely manner.

The utilisation of existing infrastructure should be prioritised in the bioeconomy. This includes both the gas and electrical system.

The charging methodology for the Public Service Obligation (PSO) levy on electricity customers does not currently support the development of High Efficient Combined Heat & Power (CHP) from renewable biological resources. This is because the levy is charged based on the sites Maximum Import Capacity (MIC) which is required as back up for sites that normally export renewable electricity into the grid. We hope that the scope of the policy statement will help to ensure that inconsistencies like this can be removed. A c/kWh PSO Levy sends a clear market signal to invest in energy efficiency.

3. What lessons can Ireland take from the European approach, including to the Circular Economy?

No comment

4. Given the cross-sector nature of the bioeconomy, how can a national policy statement best support development?

By setting out a time frame which calls for immediate action to develop the bioeconomy and ensuring those assigned responsibility, follow through on their commitments. This should include checks to ensure all future sectoral strategies are aligned with the national bioeconomy policy statement.

Any such national policy should take into account that we need to transition towards a low-carbon economy.

5. Can we identify a common set of principles, including in particular the application of the cascading principle, which will assist in the development of both the bioeconomy and the circular economy?

In relation to the cascading principle, waste heat from the combustion of renewable biological resources should also be viewed as a resource. The development of High Efficiency CHP and heat networks should be strongly encouraged. The development of the use of the ash from these power plants should be supported.

6. How can a national policy statement support local and regional cooperation around the use of renewable biological resources?

The policy statement should encourage clear national guidelines so that there is consistency in the planning for bioeconomy energy projects across the country.

7. How can waste policy, including an examination of the definition of waste, best support developments in the bio and wider circular economy?

Defining waste wood into varying categories as is done in UK and ensuring investigation into the added value that can be achieved from biomass ash from energy plants.

8. How can we stimulate market demand for bioeconomy products? What is in it for the consumer?

By charging the PSO Levy on a kWh basis, the costs for the consumer would remain unchanged, however the stimulus to invest in bioeconomy products would be increased greatly.

9. What is the most appropriate mechanism to coordinate development and monitor progress?

Set goals and make firm commitments to develop the economy and ensure that those responsible for the development take on that responsibility and make sure it happens.

The Department of the Taoiseach to then ensure that all future legislation and sectorial strategies are compliant with the national policy statement on the bioeconomy.

10. Are there any other issues to be addressed through a national policy statement?

A national policy on the transition to a low-carbon economy.

There still is a requirement to support processes and technologies that are helping to transition such as energy reduction and High Efficiency CHP.

Fingleton White are happy to discuss our views in more detail in person or at future bioeconomy events.

Regards,



Kevin Fortune