

Department of Enterprise, Trade and Employment
23 Kildare St
Dublin 2
D02 TD30

23rd May 2023

RE: Public consultation on the EU proposal for the Net-Zero Industry Act

To whom it concerns,

Cork Chamber represents 1,200 members employing over 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals.

On behalf of our membership, Cork Chamber welcomes this opportunity to contribute to the Public consultation on the EU proposal for the Net-Zero Industry Act (NZIA). The Act signifies Europe's dedication and commitment to fulfilling its climate ambitions and represents a step forward on building a zero carbon economy in Europe. As Cork strives to meet its own climate targets, having been selected as one of 100 cities that will lead the way on climate action and smart cities across Europe, this Act is more important than ever before for our region.

Cork has the potential to become a major hub for renewable energy generation and should emerge as a frontrunner in Europe in offshore wind energy. This would not only help support economic growth in the region but it would also help in achieving our ambitious climate targets. It is therefore very positive to see onshore wind and offshore renewable technologies among the eight strategic net-zero technologies that are being supported by this draft NZIA.

Although Cork has a lot to gain from reaching its decarbonisation ambitions, the benefits of achieving the aims of this draft NZIA Act will be felt right across the country and throughout Europe especially in terms of increasing resilience, ensuring the security of the energy supply, promoting energy efficiency, and developing new and renewable forms of energy.

On this basis, we have made a number of observations under the seven pillars which underpin this Act, and we hope you will give them your consideration.

Yours sincerely,



Conor Healy
CEO

Pillar 1 -Setting enabling conditions

Cork Chamber welcomes the proposal under this pillar, as it is vital that conditions are favourable to attract investment in net zero technologies. In order to drive innovation, scale up deployment, reduce costs, create jobs and stimulate economic growth it is essential that the permit-granting process is streamlined and simplified. Barriers to this have proven only to stifle development.

One of the main aspects of this pillar is to introduce time limits on the permit granting process as well as requiring Member States to establish a single point of contact for permitting net-zero projects. This will be of vital importance here in Ireland and in Cork where the region has the potential to become a major offshore renewable energy hub. The particular proposals for net-zero strategic projects deemed essential for reinforcing the resilience and competitiveness of EU industry are also supported by Cork Chamber. Rapid administrative treatment and financing advice stemming from the Net-Zero Europe Platform would be beneficial to such net-zero strategic projects here in Ireland as well as the proposal to award urgent treatment in all judicial and dispute resolution procedures.

Pillar 2 -Accelerating CO2 capture

Ireland has ambitious climate action targets, with Cork being designated as one of 100 European cities who will lead the way on climate action and smart cities across Europe. Carbon Capture and Storage has potentially an important role to play as we transition to net zero and in Cork a strategic site exists that could play a crucial role in the capture of CO₂. The Kinsale Head Gas Field has been identified as one such suitable storage site¹ and can also be potentially used for hydrogen storage. However, we need to ensure that CCS is targeted at energy intensive and hard to abate industries and used a transition technology to put us on a pathway to net zero. CO₂ storage should not take away from the more immediate need to decarbonise industrial processes and drive efficiencies.

Pillar 3 -Facilitating access to markets

The Act requires public authorities to consider sustainability and resilience criteria for net-zero technologies in public procurement or auctions. This type of intervention is an important tool to boost diversification of supply for net zero technologies. Under this pillar proposed schemes would also support private demand by consumers, which is essential for SMEs and entrepreneurs to generate revenue and make net-zero technologies more cost-competitive. It will also provide confidence for investors which will in turn lead to the scaling of net-zero technologies. Without doubt these proposals will have a very positive impact and will give weight to sustainability in decision making.

Pillar 4&5 – Enhancing Skills and Fostering innovation

Cork Chamber has been a strong advocate of attracting and retaining high quality and diverse talent as well as skills building, which will be needed to ensure a successful climate transition. In developing the skills of the future, Cork's internationally recognised universities and research institutes, and reputation as a learning city with strong ties between the business community and academia place our city region at an advantage. It is therefore positive to see proposals for the establishment of Net-Zero Industry Academies. However it is crucial that the creation of these academies are delivered in each Member State in partnership with existing universities and research institutes to be effective.

¹ <https://www.ervia.ie/who-we-are/carbon-capture-storage/carbon-storage/>

Net Zero regulatory sandboxes offer a range of benefits and will promote collaboration and learning as well as providing regulatory flexibility and fostering innovation. However, it's important that there are few limitations on these sandboxes (such as limitations around commercially available technologies) to allow for the real benefits of innovation to be experienced.²

Pillar 6 -A Net-Zero Europe Platform

The exchange of information will be a key asset to Europe in fulfilling its commitment to climate change and decarbonisation. Under this pillar proposals will see the Commission and Member States working together to ensure the availability of data to monitor progress toward the objectives of the Net-Zero Industry Act which will be vital to its success. The Net-Zero Europe Platform will also address financing tools by identifying financial needs, bottlenecks and best practices for projects across the EU. As a region poised to become a renewables hub, support from this platform could allow Cork to position itself as a leader in offshore wind energy.

Pillar 7 -Building Industrial Partnerships

Net-zero industrial partnerships with other EU countries offer opportunities in many areas such as knowledge sharing, access to funding and resources and innovation. As Cork and Dublin endeavour to become climate-neutral cities by 2030 net-zero industrial partnerships could help foster collaboration among industry stakeholders as well as research institutions and policymakers which would allow us to make that transition in time. It would also be of great benefit from a market integration perspective as it will promote coordination among those countries who are involved in these partnerships.

² <https://www.oceanenergy-europe.eu/innovation-is-the-core-driver-of-european-competitiveness-why-is-it-missing-from-the-net-zero-industry-act/>