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20<sup>th</sup> April 2023

**Re: Submission to OREDP II Consultation**

A Chara,

Please find attached a submission from the Southern Regional Assembly (SRA) on the OREDP II Consultation.

The SRA welcome the opportunity to input to the development of the new national spatial strategy for Ireland's offshore renewable energy (ORE) future.

This submission sets out four recommendations under the following:

- 1) ORE a growth sector to drive balanced regional development.
- 2) ORE servicing demand centres in close proximity across the Regions.
- 3) Our Region's ports strategically enabling ORE development
- 4) Further Considerations for OREDP II from the Members of the SRA
- 5) RSES implementation initiatives supporting ORE development

**1: ORE a growth sector to drive balanced regional development**

The SRA welcome principles that underpin the "Enduring Regime" under OREDP II to ensure the economic, environmental and societal benefits of ORE are realised for everyone. In addition to achieving Ireland's climate goals, decarbonising our energy system by 2050 and strengthening our energy security, OREDP II is committed to balanced regional development.

Developing ORE is a positive proposition for the Region's economic development. ORE is a sector in which the Southern Region can position itself to be leader in nationally and internationally such are the resources and developing assets in the marine economy present in the Region.

The SRA welcome the stated objective in the Draft OREDP II to deliver balanced regional development, benefiting coastal, marine and island communities.

In the case of the Southern Region, the Region's priorities for investment are identified in the Regional Spatial and Economic Strategy (RSES) and Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford which came into effect on the 31<sup>st</sup> January 2020. In line with the National Planning Framework (NPF) and the National Development Plan (NDP), they set a 12-year statutory strategic planning and economic development framework for future economic, spatial, and

social development of Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities and metropolitan areas (Cork, Limerick-Shannon and Waterford) to grow by 50%-60% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. The Southern Region's population is targeted to grow by up to an additional 343,500 persons by 2031 and an additional 225,000 in employment.

The RSES strongly supports the development of the marine economy and specifically seeks to realise the Region's ORE potential (Regional Policy Objective 85 "Renewable Offshore Energy"). Harnessing the potential of ORE through infrastructure development and grid connection is central to the Region's low carbon energy future. Developing the capacity of our port assets to service ORE is also supported by several objectives.<sup>1</sup>

Research undertaken by the Southern Regional Assembly in 2021 on a regional approach to Smart Specialisation<sup>2</sup> identified innovation in the development of marine renewable energy as one of the region's priority growth sectors and economic specialisms.

Wave, tidal and wind energy production were identified as growing sectors of technological specialisation (marine engineering, marine sensors, subsea remotely operated vehicles, subsea power cables inter alia). The Region has international energy transmission facilities with marine infrastructure and cross sea connections to Europe include the Eirgrid Celtic Interconnector.

Additional strengths for ORE development identified by stakeholders include port infrastructure, marine enterprise development and centres of marine research and innovation.

Port infrastructure and strategic landside assets include:

- Shannon Foynes Port, a Tier 1 international multi-purpose deep water port facility with significant capacity and potential to lead and service ORE wind production.
- The wider Shannon Estuary, including strategic development lands for marine and renewable energy enterprise identified through the Shannon Integrated Framework Plan in Clare, Limerick and Kerry.
- The Port of Cork, a Tier 1 International multi-purpose deep water port facility with strategic assets for the Marine Economy in the South-West including Ringaskiddy, Marino Point, Whitegate and Bantry.
- The South-East contains two ports of national significance in the Port of Waterford and Rosslare Europort (both Tier 2 ports) which have the potential to service offshore wind projects including Helvick Head, Waterford; Celtic Sea Array, Waterford and Kilmichael Point, Wexford.

Centres of Marine Research and Innovation, include:

- ESB International off-shore Wave Energy test site off the coast of Clare and tidal action renewable energy investigations in the Shannon Estuary.
- The potential to develop a world class marine facility and Maritime Economic Zone (MEZ) and maritime training centre servicing the ORE sector in Kilrush Co Clare.
- Mobile and Marine Robotics Research Centre hosted at the University of Limerick.

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<sup>1</sup> RPOs 95-104 Renewable Energy, 146-147 High Quality Connectivity and Economic Opportunities of Ports and RPOs 219-224 Strategic Energy Grid.

<sup>2</sup> Interreg Europe Cohesion Project, Southern Regional Assembly and BABLE, 2021, Regional Approach for development of a Smart Specialisation Strategy in the Southern Region. Available at:

<http://www.southernassembly.ie/news/news-article/a-regional-approach-to-smart-specialisation>

- The Centre for Marine and Renewable Energy (MaREI) in Cork which in addition runs the “Entrepreneur Ship”: the world’s first business incubator dedicated to marine and energy companies.
- The South East Technological University is home to emerging marine innovation and sustainable marine research.

The Regional Enterprise Plans (REPs) for the Mid-West (MW), South West (SW) and South East (SE) Strategic Planning Areas have current actions to support employment growth through ORE.

In the MW REP<sup>3</sup>, under Strategic Objective 2 “Make the Mid-West Ireland’s leading sustainability / low carbon region”, specific actions include:

- Action 2.1: The Atlantic Green Digital Basin, decarbonising industry by developing the Shannon Estuary as a renewable energy hub.
- The Atlantic Green Digital Basin strategy aims to couple the generation of renewable energy, attracting supply chain jobs, and overall industrial growth by bringing the users of renewable energy, such as high-tech firms, advanced manufacturing and data centres, physically close to the energy source.
- Action 2.2: Build regional research, education and training capacity for emerging renewable energy opportunities.

In the SW REP<sup>4</sup>, under Strategic Objective 5 “Embrace the opportunities of Climate Action in the Marine, Circular Bioeconomy, Tourism and Energy Sectors Economy”, specific actions include:

- Action 5.1: To increase the number of start ups and SME’s with sustainable marine, circular bioeconomy and energy solutions through relevant accelerator programmes.
- Actions 5.5 and 5.6: Collaborate with the Mid-West Region to support economic development potential of the Shannon Estuary and build regional research, education and training capacity for emerging renewable energy opportunities
- Action 5.7: Develop funding applications for innovation programmes and infrastructure facilities for climate action, blue economy, circular bioeconomy, energy, sustainable port activities and just transition.

In the SE REP<sup>5</sup>, under Strategic Objective 2 “Green Growth”, specific actions include:

- Action 2.1: Position the South-East as an Offshore and Onshore Wind Energy Hub.
- Bring together key regional stakeholders in a South-East Wind Energy Working Group/ cluster to develop a strategic approach to offshore wind energy development to focus on skills, regional supply chain, marketing and research.
- Action 2.3: Support the growth of a National Centre of Excellence in Marine Innovation in the South-East.

OREDP II has identified initial Broad Areas of Interest for ORE development which include Celtic Sea-East and Mid-West (Shannon/Foynes area) off the coast of the Southern Region. Other suitable locations within the Region should be considered through the OREDP II framework, including through Designated Maritime Area Plans. Regular reviews through an Adaptive Management Plan approach will guide the strategic development of ORE activity in our marine areas.

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<sup>3</sup> Department of Enterprise, Trade and Employment, Mid-West Regional Enterprise Plan to 2024. Available at: <https://enterprise.gov.ie/en/publications/mid-west-regional-enterprise-plan-to-2024.html>

<sup>4</sup> Department of Enterprise, Trade and Employment, South-West Regional Enterprise Plan to 2024. Available at: <https://enterprise.gov.ie/en/publications/south-west-regional-enterprise-plan-to-2024.html>

<sup>5</sup> Department of Enterprise, Trade and Employment, South East Regional Enterprise Plan to 2024 Available at: <https://www.gov.ie/en/publication/102ef-south-east-regional-enterprise-plan-to-2024/>

**Recommendation 1:** OREDP II needs to strengthen the commitment to balanced regional economic development which is central to national and regional policy. Strong growth and economic performance in the Regions are essential to realise the potential and develop the ORE industry at the scale required to meet our Climate Action targets.

1.1: To ensure alignment to the statutory spatial and economic policies and infrastructure priorities at regional and local level, consider and clarify the roles of Regional Assemblies and Coastal Local Authorities as part of the implementation governance structures for OREDP II, roles as stakeholders in the identification of areas of potential interest and developing Designated Maritime Area Plans and as part of the “Adaptive Management Plan” process.

1.2: Implementation governance and Adaptive Management Plan process should seek to support Regional Enterprise Plans in each Region which have actions and multi-sectoral working groups to support growth of ORE industry, develop Marine clusters, renewable energy hubs and grow high value supply chain jobs in the sector.

1.3: OREDP II implementation governance should work with Regional Enterprise Plans, Regional Skills Fora, Higher Education and Further Education and Professional Institutes to ensure education, training and upskilling is resourced and developed to supply the skilled labour force needs to work within ORE sectors (directly and indirectly).

1.5: Ensure there is cross government department buy-in to implement OREDP II to ensure balanced regional development is underpinned by the required level of infrastructure investment, project delivery (especially enhanced inter-regional connectivity across multi-modal transport, digital connectivity and energy grid) and skills development. Strong performing Regions are essential to develop the ORE industry and the scale required.

**2: ORE servicing demand centres in close proximity across the Regions.**

Demand centre proximity is identified in the draft plan as key criteria in selecting broad areas of interest to develop OREDP II. This is welcomed by the SRA, where the draft plan states “ electricity demand is forecast to increase over the coming decade and the spatial distribution of additional demand ensures that the growth needs for specific regions are identified”.

The NPF, RSES and Local Authority City and County Development Plans are aligned in the distribution of growth targets for the Regions and at county and settlement level. Necessary enabling infrastructure to service this growth is identified in these statutory plans. Development of the energy grid and integration of renewable sources of electricity production is an essential infrastructure to service targeted growth.

As stated in Section 1.0 above, each Region has set spatial and economic growth targets including significant growth in the Cities and Metropolitan Areas, Key Towns , other settlements and rural areas to drive balanced regional growth whereby the targeted level of growth in the Northern and Western and Southern Regions combined at least match that expected in the East and Midland Region to 2040. The growth needs across the regions to 2040 is therefore significant. It is imperative that OREDP II aligns with regional growth targets and integrates with strategies future proofing our electricity grid (such as Eirgrid’s Shaping our Electricity Future) which have also planned for ORE integration to the grid and demand centre requirements.

In addition to cross regional distribution, renewable energy produced from off-shore renewable energy sources could supply, at shorter distances, the power demand generated from population and economic growth in each Region including our Cities and Metropolitan Areas (Cork, Limerick-Shannon and Waterford), Key Towns and our network of settlements and rural communities which are co-located or in close proximity to interact with ports, harbours and ORE resources off our coasts.

**Recommendation 2:** Maximise demand centre proximity as a criteria and strength for a regional distribution of ORE production to service population and economic growth targets in growing Regions.

2.1: Renewable energy from marine sources has the potential to supply locations of targeted population and employment growth along our southern, western and northern coasts in addition to the east coast, especially centres of scale including our Cities and Metropolitan Areas, Regional Growth Centres and Key Towns which are either co-located or closely accessible to ports and harbours and the coast. OREDP II should strengthen this need to service centres of demand as criteria in determining locations of ORE development and a justification for investing in enabling connecting grid infrastructure.

2.2: The electricity transmission system operator should be required to align with the sources of ORE production , as identified through a plan-led, evidence-based approach such as OREDP II. Consultation and the need for Eirgrid's Roadmap for Shaping our Electricity Future to align with OREDP II needs to be a consideration for implementation.

2.3: OREDP II and reviews of it through the Adaptive Management Plan process needs to align with NPF, RSES and City and County Development Plan growth targets to ensure the opportunity for ORE to supply energy demand is maximised with strategic connections to the electricity grid.

2.4: Roles for Regional Assemblies and Coastal Local Authorities as part of the implementation governance structures for OREDP II, in the identification of areas of potential interest and developing Designated Maritime Area Plans will ensure the contribution of ORE to service planned growth and centres of high energy demand in the Regions in close proximity to renewable sources of power is maximised.

### **3.0 Our Region's ports strategically enabling ORE development**

The Department of Transport's recent policy position on the role of commercial ports to facilitate ORE<sup>6</sup> recognised the existing ports in Ireland have a significant role in providing the required large-scale port infrastructure for ORE deployment.

The policy recommended a multiport approach to address the needs of the ORE industry and to position Ireland to take advantage of the economic opportunity created by the roll out of both fixed and floating offshore wind in Irish waters. ORE developments will typically require both large-scale port infrastructure for project deployment and smaller-scale port facilities to provide ongoing operation and maintenance services.

This position is advocated by the SRA who have consistently advocated in pursuit of RSES objectives<sup>7</sup> for greater national policy priority for ports and harbours in the Southern Region. Our cities and metropolitan areas in the Southern Region are each interconnected with economic activity of Tier 1 and Tier 2 Ports which play a strategic role in their economic development and growth.

Optimising the capacity of our port and harbour assets for economic competitiveness advances Regional Parity and provides a counterbalance to pressures on Dublin's infrastructure. Improved regional connectivity (multi modal road and rail freight networks ) with guaranteed journey times for moving people and logistics to and from our Tier 1 and Tier 2 Port assets (Ports of Cork, Shannon-

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<sup>6</sup> Department of Transport Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland (December 2021).

<sup>7</sup> RSES RPOs 140-147 including RPO 144 Port Infrastructure and RPO 147 Economic Opportunities of Ports were cited in SRA submissions to the National Development Plan Review and National Economic Recovery Plan.

Foynes, Waterford-Belview and Rosslare Europort), between our regional ports, harbours and fishery centres and on the EU TEN-T core and comprehensive networks that cross our Regions is vital for our economic resilience. This strengthened connectivity between ports will service the ORE sector.

The Draft ORDP II identifies the need for onshore infrastructure, the capacity at ports, large scale industrial opportunities and green hydrogen potential as important criteria for selecting broad areas of interest to investigate further and develop ORE potential.

This inclusion is important. However, the SRA consider that it underplays the fact that without the sustainable growth of port capacity, the ability to develop and connect ORE with our energy grid will not materialise. There is no sense in the plan on the urgency needed to sustainably increase the capacity and ability of ports to facilitate ORE development. Otherwise, the ambition and targets are untenable.

This is underlined by the recent publication relating to the National Ports Policy by Wind Energy Ireland 2022<sup>8</sup> which found there is currently no existing capacity in place to support floating technology but subject to infrastructure improvements, this capacity can be secured by our ports. However, there is a gap between the urgency on securing ORE targets and the time needed to support ports and develop their capacity to facilitate the sector. Without a significant scaling up of infrastructure preparation, Ireland may lose out on significant economic benefits from construction and servicing the ORE sector (ports in the UK or Europe could become the service ports if infrastructure ready).

The opportunities for port development and facilitating ORE is recognised by the port companies. Each of the Tier 1 and Tier 2 Ports either have developed or are in the process of developing ambitious and visionary masterplans to future proof port capacity to service ORE potential. The following are examples of the opportunities being identified.

#### **Shannon-Foynes Port Company**

- The Shannon Foynes Port Company recently published its Vision 2041 Strategic Review which capitalises on the port's strategic road and rail freight connectivity. The review identifies that through the advancement of floating wind technology, over 70 gigawatts (GW) of offshore wind potential can be delivered and serviced from the Shannon Estuary if this resource is connected to sources of demand. The Shannon Estuary is uniquely positioned to host key delivery chain activities to service ORE development at scale including proximity to the natural wind and wave resource, deep water facilities and jetties (existing and planned) to allow turbine assembly and wet towing to offshore wind farms, deep water wet storage of turbine equipment and strong electricity grid connections. The review also identifies the potential for the development of a green hydrogen ecosystem in the Shannon Estuary.

#### **Port of Cork**

- The Port of Cork is currently developing a masterplan to 2050 in consultation with stakeholders as it continues to consolidate activities in the lower harbour. The review identifies that through the port's existing scale and turn over, multiple deep-water port facility locations (including Ringaskiddy, Whitegate, Marino Point, Dognose Bay and Bantry Harbour), the port has significant potential to develop as an energy hub and enable the green energy sector. The port can provide deep-water channels and berths; potential to accommodate large project cargoes for offshore wind marshalling and assembly activities and provide access to berth and quays for operation & maintenance activities. There is also potential to develop Green Hydrogen. The Port is engaging with several private sector and semi-state companies spearheading the delivery of ORE.

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<sup>8</sup> National Ports Study, 2022, Wind Energy Ireland and Gavin & Doherty Geosolutions Available at: <https://windenergyireland.com/images/files/final-national-ports-study.pdf>

## **Rosslare Europort**

- Rosslare Europort have published a masterplan to develop “Ireland’s Gateway to Europe and ORE National Hub”. The plan states the port is ideally positioned to service ORE in the Celtic Sea and meet the Climate Action Plan targets. The port can offer marshalling, assembly, staging and load out of key components, operations, maintenance and crew transfers. The Port Company is actively working with Waterford Port, Local Authorities, Business and Enterprise sectors and ORE industry leaders to develop enabling and support infrastructure and has applied for EU Connecting Europe facility funding. The masterplan aims to deliver an ORE purpose-built quay and berth facility, ORE quayside storage, navigable channels, a control centre and offices facilities. There is potential to generate up to 2,000 new jobs locally from the ORE sector.

ORDEP II therefore needs to copper fasten a cross government commitment for parallel investment in the Region’s ports and harbour assets, support inter regional and intra-regional multi-modal connectivity between ports and on the TEN-T core and comprehensive networks and support port masterplan development.

**Recommendation 3:** OREDP II needs to strengthen the emphasis on having on shore infrastructure in place, especially port and harbour infrastructure capacity, as a matter of urgency to develop service and maintain our ORE capability and supply chain economic activities.

3.1: OREDP II needs to align with parallel cross government policy and funding to deliver enabling onshore infrastructure, especially port transport accessibility (multi modal), digital and electricity grid connectivity and on site port infrastructure facilities to support the construction, servicing and on-going operation and maintenance of ORE locations. The review of National Ports Policy will be a key opportunity to strengthen support to Tier 1, Tier 2 and regional port and harbour assets in facilitating ORE alongside other key operational activities.

3.2: Further to the publication of the Department of Transport Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland (December 2021), strengthened support is needed to realise the vision of port masterplans and identify funding pathways on an on-going and longer term basis (such as Connecting Europe Funding facility (CEF) and other funding sources beyond it) to assist the implementation port infrastructure projects facilitating ORE and the transition of ports to a zero carbon future.

3.3: The preparation of Designated Maritime Area Plans (DMAPS) where they will guide the sustainable development of port activity in the marine area to facilitate and service the ORE sector, need to be resourced, guided and streamlined processes to ensure the urgency to enhance port capacity for ORE is balanced with protecting our natural marine heritage and environment. OREDP II should give an impetus to the preparation of DMAPS that will be required to guide sustainable development and interactions between different marine activities. The resources and skills requirement within the necessary national, regional and local planning system to prepare and implement DMAPs to guide ORE development need to be prioritised parallel with OREDP II.

## **4.0 Further Considerations for OREDP II from the Members of the SRA**

The elected members of the SRA were consulted in the preparation of this submission and have raised the following to strengthen OREDP II harnessing the strategic energy infrastructure, marine economy and natural resources of the Southern Region:

4.1: OREDP II needs to give strengthened national policy support and funding support to develop centres of training and excellence servicing the ORE sector. An example is the Clare

Maritime Economic Zone training centre servicing the ORE sector in Kilrush County Clare. This facility can deliver a significant regional educational facility which is already receiving recognition through Enterprise Ireland and the Rural Regeneration Development Fund. This and the development of other centres of excellence for the ORE sector across our Region need stronger central government backing through the OREDP.

4.2: OREDP II needs to support the just transition and repurposing of traditional fossil fuel energy generation facilities and infrastructure assets to new technologies in renewable energy. For example, the Green Atlantic project at Moneypoint is a programme of significant investments for the region over the next decade, transforming Moneypoint into a green energy hub. A floating offshore wind farm of 1,400MW is part of their proposal to be developed off the coast of Counties Clare and Kerry in two phases by ESB. Once complete, the wind farm will be capable of powering more than 1.6m homes in Ireland. Moneypoint envisages that it will become a centre for the construction and assembly of floating wind turbines. A deep-water port already exists at the site, making it an ideal staging ground for the construction of the wind farm.

4.3: The potential to develop a renewable energy hub and green hydrogen plant at Whitegate in Cork is progressing, another demonstrator of the strategic potential for green energy transition using existing assets in our Region . Proposals include the potential to connect planned offshore wind developments into the hub, capitalising on existing deep-water port assets, proximity to strategic sites in the Port of Cork and Cork Harbour Economy.

4.4: The development of renewable energy hubs by repurposing existing energy infrastructure assets co-located within our deep-water port assets is a significant proposition for job creation and to drive the Region and State economy. These assets need to be fully capitalised and supported by OREDP II.

4.5: There is concern on the use of inconsistent scales in mapping, including Figure 11-1 Potential Broad Areas of Interest based on the proposed criteria. At a glance it may be assumed that the 3 locations identified are of a similar size, however the scale of the drawings are such that the area of interest for the Shannon Estuary for example is actually significantly smaller than the area identified for the Celtic Sea or the North West Area. The submission should look to have a consistency in scale for all further consultation documentation.

4.6: While the Draft states the areas of broad interest will be subject to further assessment and continual review, there needs to be greater clarity that broad areas of interest, through consultation with stakeholders and evidence base, can be increased. For example, the extent of area for the Shannon Estuary limits what can be delivered by the interested parties who are exploring offshore wind developments within the estuary. The final OREDP II needs to clarify this.

## **5.0 RSES implementation initiatives supporting ORE development**

The following two initiatives of the SRA have been identified as transformative actions under the Two Review of the RSES<sup>9</sup> and are summarised below to assist OREDP II implementation.

### **Regional Ports and Harbour Strategy**

The SRA are advancing work on preparing a Ports and Harbour Strategy for the Southern Region. The strategy will aim to provide a set of researched, evidence-based recommendations to Government to

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<sup>9</sup> RSES Two Year Review Monitoring Report 2022. Available at: [https://www.southernassembly.ie/uploads/general-files/RSES\\_Two\\_Year\\_Monitoring\\_Report\\_Web\\_Version.pdf](https://www.southernassembly.ie/uploads/general-files/RSES_Two_Year_Monitoring_Report_Web_Version.pdf)



inform the development of new national ports policy, communicate the economic role of our port assets on our Region's economy and support strengthened national policy prioritisation and funding towards port infrastructure. The individual and combined strength of our port assets (Tier 1, Tier 2 and Regional Ports) is a significant proposition for national and regional growth and the ORE sector which the strategy will seek to convey to assist our port stakeholders.

**Regional Renewable Energy Strategy Roadmap and Strategy under the Climate Acton Plan.**

The Climate Action Plan gives responsibility to the Regional Assemblies for the preparation of a roadmap for Regional Renewable Electricity Strategy. The SRA are developing this action in conjunction with the Department of Environment, Climate and Communications, SEAI and the other Assemblies. In addition, the SRA have secured support from ESPON (EU Programme carrying out EU territorial analysis) to conduct a case study on decarbonisation in the Southern Region. This analysis will inform and support the development of a Regional Decarbonisation Plan. Harnessing the potential of ORE in the Region will be a strategic opportunity supported by the upcoming strategy.

The SRA encourage further engagement with the Department on the development of both these regional initiatives.

**Recommendation 5:** The SRA will welcome further engagement with the Department of the Environment, Climate and Communications on the preparation and recommendations of the Regional Ports and Harbour Strategy and Regional Renewable Energy Strategy, two initiatives under RSES implementation which will support the objectives of OREDP II.

**Conclusion**

The SRA welcome this opportunity to make this submission. Developing the ORE sector is a significant opportunity for Regional economic development in addition to achieving our national target for a zero-carbon energy system by 2050 to meet our Climate Action commitments. These recommendations, including important points raised in this submission by the members of the SRA, aim to reinforce, strengthen the Region's opportunities and achieve the important objectives of OREDP II.

The SRA will welcome a follow up consultation to discuss this submission and look forward to further engagement on the final OREDP II and its implementation structures.

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David Kelly  
Director