



Working with you for our energy future

Appendix 5

Review of Consultation and Community Engagement Programmes for Transmission Projects

SLR Consulting Limited



Review of Consultation and Community Engagement Programmes for Transmission Projects



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1.0 INTRODUCTION

SLR Consulting was retained by EirGrid to undertake an independent review of consultation and community engagement process implemented by EirGrid for the North South Interconnector, the Grid West Project and the Grid Link Project. Based on the findings of the study and output from workshops with the EirGrid Project and Executive teams, SLR was able to highlight the effectiveness and limitations of the consultation and community engagement programme. The successes and weaknesses were examined and possible lost engagement opportunities identified. The programme was benchmarked against other industries and a best practice matrix developed. Finally recommendations for the way forward in consultation and community engagement have been proposed.

2.0 BACKGROUND

EirGrid is an independent, state-owned company whose role is to operate a safe, reliable, economical and efficient national electricity grid. EirGrid is implementing a €3.2 billion investment programme, Grid25, to upgrade the electricity transmission network. Grid25 will build 800 kms of new power lines and upgrade 2,000 kms of existing lines throughout Ireland to provide network capacity to enable Ireland meet its renewable energy targets and security of supply. The North South Interconnector, the Grid West Project and the Grid Link Project are part of the Grid25 investment programme.

2.1 EirGrid's Public Consultation Process

Eirgrid has a clearly defined, well thought out and technically well executed public consultation process. Quite late on in this process, when the emerging preferred route corridor options are published, significant opposition to EirGrid projects emerge as those living along the identified corridors voice their concerns about potential impacts on the environment, their health and property prices.

A large number of anti-pylon protest groups, in excess of 45, have been established all over wide parts of the country including in Wexford, Wicklow, Carlow, Kildare, Kilkenny, Laois, Tipperary, Cork, Mayo and Waterford, and are actively collaborating in their opposition. Some anti-pylon groups considered running in the local elections which were held in May 2014. This energised politicians including, for example, MEPs Marion Harkin and Phil Prendergast, to oppose the EirGrid projects on health grounds. Engineers Ireland, the IFA, and Fáilte Ireland have all expressed their views on the EirGrid projects.

While EirGrid has been diligent in its consultation with stakeholders, the management of stakeholders' expectations has been more difficult. With increasing emphasis by community groups on the implementation of the Aarhus Convention¹ it is not clear what level of public participation is expected on the scale of inform, consult, involve, collaborate and empower (Figure 2.1). EirGrid is expected to be as transparent as possible in its decision-making and to demonstrate how public participation contributes to and impacts on the final decision. This approach would address the commonly held view of consultees (see Section 5.5 below) that

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¹ The UNECE Aarhus Convention was adopted on 25th June 1998 as part of the 'Environment for Europe' process. It sets down basic rules to promote the involvement of citizens in environmental matters and improve enforcement of environmental law, and is legally binding on States that are Parties to it. Aarhus focuses on three elements: Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. Ireland signed the Aarhus Convention on 25 June 1998 and ratified the Convention on 20th June 2012.

the consultation process appears meaningless because the decision has already been made by EirGrid; thus, EirGrid is 'telling' rather than 'listening'.

This review and its recommendations provide some guidance on how to incorporate the stakeholder consultations into the decision making process while providing transparent reporting of the process.

2.2 Social Context for Grid25

Since Ireland's national energy policy was adopted in 2007, when a target of 40% of overall electricity consumption by 2020 from renewable sources was set, the social and economic context for implementation of the Grid25 rollout has changed markedly.

The economic collapse in 2008 has heralded an unprecedented breakdown of trust among the Irish citizenry in government and public institutions, an outcome that will potentially have long term consequences for the democratic process.

The inchoate public anger of 2008 remains below the surface and continues to be expressed through other avenues, frequently unlinked to the economic situation, but more where people feel powerless or disempowered. The examples of the vehement opposition to the Midlands wind energy export project or the proposals for shale gas exploration in Leitrim demonstrate that the citizens will now vent their anger where they feel decisions are being taken without their consent.

Access to second and third level education in Ireland continues to exceed European norms, and the average citizen is now informed, confident and unafraid to challenge authority.

Access to information in this past decade has increased exponentially through the widespread use of the internet for primary research purposes, while the ease of communications has been facilitated greatly through the use of social media. While these are positive benefits for society, there can also be negative attributes where selective use of non-peer reviewed 'science' and misinformation can be easily accessed and spread.

The connection through websites, Facebook, blogs and twitter of what were heretofore isolated community lobby groups, has heralded a new form of civic lobbying power against e.g. wind www.windawareireland.ie, shale gas, Corrib gas and more recently pylons, through the Pylon Alternative Alliance http://www.pylonalternativesalliance.ie/local-groups. These lobby groups are strong, articulate and forceful entities at local and regional levels. Community activists are seeking increasing inputs to national policies that impact directly on local communities and are finding that legal challenges can be financed locally through crowdfunding mechanisms - see http://www.independent.ie/irish-news/communities-50000-war-chests-to-fight-wind-farms-30621216.html.

Other non-governmental organisations (NGOs) and Transition Ireland http://transitiontownsireland.ning.com/ are advocating strongly for inputs to renewable and conventional energy policy under the provisions of the Aarhus Convention. The national People's Energy Charter was ratified in late 2013 – see http://pecireland.eu/. The PEC and Transition Networks, north and south, are actively collaborating in their responses to the National Green Paper on Energy in Ireland, which are broadly positive towards renewable energies, including wind, but would wish to see much more effective public participation and input to energy policy.

There is a strong feeling that citizens are not being consulted, despite e.g. the national consultation on the Green Paper on Energy or the Grid25 projects consultative process. The

old ways of communicating 'at' people are no longer enough – everything has changed utterly.

		INCR	EASING LEVEL OF PUB	LIC IMPACT	
	Inform	Consult	Involve	Collaborate	Empower
The Goal	To provide the public with balanced and objective information to assist them in understanding the problems, alternatives and/or solutions.	To obtain public feedback on analysis, alternatives and / or decisions	To work directly with the public throughout the process to ensure that public issues and concerns are consistently understood and considered	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution	To place final decision making in the hands of the public

Figure 2.1 Public Participation Spectrum (Monaghan Model, 2005)

3.0 METHOD OF INVESTIGATION

A workshop was held on 6th August 2014 with the EirGrid Projects Team to review the detailed stakeholder engagement process on the Grid25 projects and to review the road map for delivery and timeframes. A further workshop was held with EirGrid's Executive Team on 12th September 2014.

Direct consultations were carried out by SLR with selected representatives from a cross-spectrum of civil society, enterprise, non-governmental organisations, intermediary organisations, representative rural enterprise organisations and other semi-state bodies, to assess their perceptions of the EirGrid engagement process to date. Distinctive themes were identified, as well as both positive and negative perceptions of the process, and some individuals made recommendations for how the process could be improved.

The material currently available on the EirGrid website (http://www.EirGrid.com/ and http://www.Eirgridprojects.com) at the North South Interconnector, the Grid West Project and the Grid Link Project homepages were reviewed by three non-technical SLR staff members, one from IT, one from Admin and one from Accounts. They were asked to examine the website assuming that their home was within one of the pylon preferred or proposed corridors and assess the effectiveness of the site as a source of information for the ordinary (non-technical) citizen. The material on the EirGrid website was also examined on screen as a team by Deirdre Lewis, Richard Vernon and Nick O'Neill.

Mainstream media coverage (RTE, Irish Times, The Examiner and Irish Independent) from April 2012 to January 2014 was also reviewed to categorise the content of the opposition and the nature of EirGrid's public response. The team used a number of guiding references, including:

- "Monaghan Model Best Practice for Community Consultations 2005",
- "Communications and Sustainability in the Mining Industry", IFC, ICMM,
- "Building Community Engagement and Social Support", NESC 2014,
- "Preventing Conflict in Exploration", PDAC, CDA and the Canadian Government,
- "A Guide to Successful Communications", European Commission 2004, (European Commission, 2004)

- CSR21 Transparency Index (2014; <u>www.csr21.org</u>)
- "Report of the Working Group on Citizen Engagement with Local Government" (DEHLG, December 2013)
- "Code of Good Practice for Civil Participation in the Decision-Making Process" Council of Europe

SLR's in-house 'social licence to operate' audit tool was used to benchmark the effectiveness of the EirGrid approach to meet stakeholder expectations of engagement, transparency and detail.

The EirGrid Kilcullen Information Office was visited in January 2014 by one of the SLR team in relation to the NESC project (*Building Community Engagement and Social Support*)² and that visit is included in this assessment.

In addition to the benchmarks referenced above, SLR has assessed the appropriateness of the EirGrid consultation and community engagement process based on its experience of nearly 20 years of community and broad based stakeholder consultation in Ireland and internationally in relation to mineral exploration, rural tourism and community wind farms.

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http://www.nesc.ie/en/publications/publications/nesc-reports/wind-energy-in-ireland-building-community-engagement-and-social-support/

4.0 EIRGRID WORKSHOPS

4.1 Workshop 1: 06/08/14

The first workshop was held in August with the EirGrid Project Team to review the detailed stakeholder engagement process on the Grid25 projects and to review the road map for delivery and timeframes. Nick O'Neill, Richard Vernon and Deirdre Lewis from SLR attended.

The Project Team has been tasked to deliver the national mandate of upgrading of the transmission grid through up to 300 projects within the Grid25 programme. The team presented a detailed case study of the 5-stage consultative process undertaken.

	Sur	nmary of EirGrid	5 Stage Road I	Мар	
Action	Information Gathering	Evaluate Options	Confirm Design	Prepare Planning Application	Wayleave & Construction
Stage	1	2	3	4	5

Table 4.1 Summary of EirGrid's 5-Stage Road Consultative Map

The EirGrid Project Team is faced with a very difficult job given the current social climate in Ireland (see 2.2 above). Challenges facing the team were discussed and a SWOT analysis was carried out on the consultative process based on the team's experience (see Table 4.2):

STRENGTHS	WEAKNESSES
 Communications Strategy Consultation Process – Road Map Stage 0 – pre-consultation Risk Assessment Experienced and well-trained team 	 Brand loss of ESB (no ground presence) Presenting technical solution too early Not anticipating/ dealing with opposition/ risks at key stages Mitigation of risks at programme level Reactive vs Proactive - letting opponents determine the agenda Speed of response (legal vetting) - or even whether to respond Resource limitations - time & budgets
OPPORTUNITIES	THREATS
Learnings & room for improvement Early flagging of least constrained routes (non-weighted but narrow options sooner/ honesty & management of expectations) Diversion of resources to address risks Independent Expert Panel (IEP) — has given pause to breathe — allow EirGrid to be seen to be responsive Social media — procure improved response mechanism Website: invite participation in structured way Alternatives to protect Grid25 Programme — need to look long term Need integrated national approach to Strategic Infrastructural developments	 Scale of negative response (38,000) - ability to influence minimal due to scale of response Social media - misinformation; community alliances; speed of action The 'culture is eating up the process'- but what next? The 'perfect storm' (Midlands wind exports/interconnector; local elections; anti-government feeling; wind generally) Effects of 1 project on entire Grid25 Programme Lack of political leadership

Table 4.2 SWOT Analysis of Process: EirGrid Technical Team Meeting (6 August 2014)

While SLR generally agreed that the consultative process was well planned and technically well delivered with positive intent, there were a number of flaws in the programme, including that the options were selected and project plan designed prior to meaningful engagement with impacted communities and other stakeholders along the routes. The technical options were essentially 'done deals' when they were presented. There was no early presentation of undergrounding as an option; it was only when the public pushback commenced that this option appeared on the discussion table. Costing of alternative under/over grounding options was not initially presented.

EirGrid should build on its use of existing forums in rural areas. These include, for example, the Community Forums in each county, Regional Authorities (now assemblies), Transition Networks or use of a representative Grid25 Advisory Steering Group that would reflect concerns and allow inputs at an earlier stage in the Roadmap. The need to engage with opposition groups arose in the team discussions – engaging with such forums would enable these groups to be positively (or negatively) engaged earlier in the process, based on agreed ground rules of respect.

The socio-economic-political climate in which the EirGrid Project Team is operating is similarly challenging. A PEST Analysis was carried out to reflect this (see Table 4.3 below).

POLITICAL	ECONOMIC
 Strategic approach required at national level Lack of leadership Need to build alliances: CER, ESB, Bord Gais Networks; etc Changing government policy over lifetime of the Programme IEP process – is this 'fudging' the mandate? Clarity now of EirGrid's mandate? Need clarification to move on the options available to team 	 Focus on Programme life cycle vs multiple individual Projects National RE/ grid delivery targets to be met National mandate – with tight / aggressive delivery timelines Creates uncertainty Costs increasing due to social pushback/ rejection – impacting on budgets/ timelines Could IEP disempower EirGrid to deliver its mandate? Thus negating any possibility of social acceptance?
SOCIAL CONTRACTOR OF THE PROPERTY OF THE PROPE	TECHNICAL Project of the second secon
 Public pushback re grid programme (= non-social licence to operate) – questioning the mandate(or not understanding it) Where should we focus resources – on every community or strategically with alliances? When is enough communication enough? Need to improve use of social media – twitter / Facebook Give option to people to participate / offer ideas via website 	 Project specific requirements New technologies - allowing new options (under-/ over-grounding) Options for 40% RE delivery changing BAU - is this an option (business as usual - no change) Future proofing requisite Impact of 1 project on whole programme

Table 4.3 PEST Analysis: EirGrid Technical Team Meeting (6 August 2014)

Some key issues and constraints were identified during the discussions, many reflecting the frustrations of a hardworking and committed team:

• EirGrid needs external support - the pushback against strategic grid infrastructure is a national problem requiring national support.

- Social media alliances of oppositional groups are growing and expectations are rising in terms of inputs to policy. Is there a need for Regional Energy Forums or some such medium to engage more effectively?
- Misinformation is increasingly problematic and difficult to counteract without appearing defensive.
- Distributive justice: what to do with near neighbours who do not get payment but must live with visual impact?
- The 38,000 responses to the consultation process were unprecedented. EirGrid needs a *structured online response* process for public consultations.
- Options: may need to apply a 'Compliance Filter' to all early options (cf. National Grid UK) prior to going public. Options should not be ruled out on technical /cost grounds too soon – let the public have input to this.
- Resource requirements are insufficient to meet the consultative mandate now the time inputs are enormous to meet the Aarhus Convention recommendations.
- Constraints: there are legal constraints on what EirGrid can say or respond to, compounded in that EirGrid is mandated to build anyhow. Thus, managing expectations is critical – will the line go ahead irrespective of how many or well the consultation process is run (if the team is to fulfil its mandate)?
- *EirGrid's mandate*? Is it now necessary to revisit Irish energy policy and modify the whole proposition?

SLR considers that political leadership, business and industry support is critical if Grid25 is to be successfully delivered, given the public mood (Section 2.2) and the threat posed for future strategic infrastructural projects in Ireland if citizens' concerns are not taken on board.

4.2 Workshop 2: 12/09/14

SLR attended a second workshop in mid-September with the EirGrid Executive Team to review the proposed response to concerns raised in the extensive written feedback to the 2014 public consultation on Grid25.

Richard Vernon and Deirdre Lewis from SLR attended.

EirGrid identified three key thematic areas of concern following significant work on reviewing the consultation process (review of submissions, international best practice review and external review):

- 1. Participative Process
- 2. Internal Process & Culture
- 3. Political Leadership & Advocacy

These thematic areas were discussed in detail at the workshop.

5.0 RESEARCH RESULTS AND FINDINGS

5.1 Wicked Problems

The need for electricity is clear to all, but the associated environmental, social and economic impact of delivering energy poses a significant challenge, which may be referred to as a "wicked problem". "Wicked problem" is a term from social planning to describe multidimensional issues where there is incomplete or contradictory knowledge, a diversity of opinions involved, interconnections with other complex problems, and significant economic considerations. Wicked problems are difficult to resolve and require an interdisciplinary approach, respect for different perspectives, active inclusion of stakeholders that are directly affected and recognition that it is rare to find a true solution and more likely that improving the situation is the best that can be achieved.

In the context of EirGrid's Consultation Roadmap, the objective should be to reduce the number of objectors among the stakeholders with the greatest potential to affect the projects (identified through a stakeholder mapping exercise) to less than 20%.

To address "wicked problems" the USEPA³ has developed the Multi-criteria Integrated Resource Assessment (MIRA) decision analytic approach http://www.epa.gov/reg3esd1/data/mira.htm that engages stakeholder participation through transparency, trans-disciplinary learning, and the explicit use of value sets (Stahl C., December 2002). This is a more inclusive problem solving process than optimal, least-cost decision analysis or expert-stakeholder models which tend to blur the important differences between expert judgements and stakeholder values. The MIRA approach offers a learning based framework for consensus building. It is based on the knowledge that stakeholders may choose to change their opinions when informed through applicable expert data. Likewise expert choices may change when researchers (or developers) learn about social concerns not previously examined in analytical models.

In this review of EirGrid's consultation process, SLR is thus treating the implementation of GRID25 projects as "wicked problems".

5.2 Review of the EirGrid Website

The first impression of the EirGrid website is that of a technical enterprise, delivering technical information. The 'About Us' section opens with:

"EirGrid plc is a leading Irish energy business, dedicated to the provision of transmission and market services for the benefit of electricity consumers. It is a state-owned commercial company".

EirGrid is committed to delivering high quality services to all customers, including generators, suppliers and consumers across the high voltage electricity system and via the efficient operation of the wholesale power market. It puts in place the grid infrastructure needed to support competition in energy, to promote economic growth, to facilitate more renewable energy, and to provide essential services."

It does not explicitly state that EirGrid, as a state-owned body, is mandated to manage the electricity transmission system on behalf of the Irish people. It may thus appear to the uninitiated that EirGrid plc. is simply a profit-driven company, rather than a public good enterprise.

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³ US Environmental Protection Agency

EirGrid would benefit from having all of its Corporate Social Responsibility (CSR) information available on a 'single click' tab linked to the home page of the website. These data are not easily accessible and require significant searching to locate relevant documents, despite the company's stated objectives of being a responsible corporate citizen. EirGrid should consider developing an updatable Sustainability Report to measure and monitor its progress through time in terms of community, environment and positive societal initiatives.

The architecture and design of the EirGrid 'Projects' area of the website conforms to best practice (European Commission, 2004). The site is regularly updated, the pages are short and print out on A4 pages, the number of links in the text is reasonable at up to 10 (less than 5 is recommended). The web structure is pyramidal and allows people of different readership levels and different levels of understanding to access the information they need. The most accessible pages provide general information while the more "distant" pages provide even more detail for the more motivated reader. The responses to essential questions are available in the first two levels of the website. The overall number of clicks required to reach essential information does not exceed three. There is a good balance between width and depth of the website. Ideally one page should provide access to a maximum of twelve subordinate pages and these criteria are met. With respect to updating, some of the FAQ pages contain a message that they are being updated which is unnecessary. The current FAQs can be left live until the new FAQ is ready for upload.

The EirGrid website is easy to navigate and contains a range of media, including video. The interactivity is good with a well planned search mechanism that delivers relevant results. The interactivity could be improved by allowing visitors to submit questions or download consultation forms and upload completed forms or submit by e-mail with automatic acknowledgement. The language is clear and precise and the website is ergonomically well designed with respect to text, navigation, links and images. However, the naming of public document files is not user friendly.

Some comments from individual assessors on the EirGrid Projects website include:

"Good website, loads of information"

"Too many maps and some of low resolution"

"No mention of any controversy on the website"

"Navigation good and impressed by the number of open days"

"Explained well what the plan is - overground versus underground"

"I like the simplicity of the layout, it is very user friendly"

"Excellent links to social media to reach an even greater audience"

With respect to social media, the EirGrid Facebook site has fewer "likes" (137) than the Twitter account followers (1,150). However the primary use of the Twitter account is to spot developing trends in public attitude before they reach the general media. Facebook accounts used by opposition groups are much more active than EirGrid's.

In terms of improvement, the level of interactivity could be enhanced. The administrative work load associated with processing the large number of stakeholder submissions to the public consultation process could be reduced if a standard form with focussed questions could be downloaded from EirGrid's Projects website. If an upload facility for public consultation submissions, that automatically generated an acknowledgement of receipt,

could be added to the website this would further reduce demand on EirGrid's personnel resources.

5.3 Review of Mainstream Media and EirGrid's Response

The launches of the public consultation process for EirGrid projects received good coverage in the media. The coverage in the media of project progress over the following year is usually sporadic. There is a significant increase in media coverage when the Constraints Report for an EirGrid project, which included maps of constraints, goes out to consultation.

The fact that the underground HVDC option had been rejected early in Stage 1 of the Consultation process, without transparent reasons communicated to stakeholders, became a common criticism. This was seen as not complying with the Aarhus Convention Article 6(4) in that key decisions were taken before consultation commenced.

Fáilte Ireland's submission included conclusions from a commissioned report by planners Brady Shipman Martin. The report said that tourism factors do not appear to be appropriately integrated into the analysis guiding the corridor selection process.

During November and December 2013, there were three meetings of the Oireachtas Joint Committee on Transport and Communications relating to EirGrid that included some

criticism of EirGrid's consultation process by anti-pylon campaigners, TDs and Senators.

Eirgrid plan just another example of State's contempt for the people Energy & Resources | Vincent Browns | January 8, 2014, 12-01 Westford and from these to Dissisteem, near Kilenillen in Co e, its what EirGest calls the Grid Linkf ...) Rabbitte accepts consultation over pylon concerns not good enough Politica | Street Carroll | Annuary 3, 2954, 22:56 (...) us involved, whether it is EirGrid - the statutory agency mentation and delivery(...) Taoiseach calls for greater consultation on erection of pylons in News | Michael (/Sirgen) December 52, 2913, 01:10 [_3-pylosis from Knockraha in Cock to Dimetown in Kildare and sand calding, were made(...) Rural Ireland rises up against EirGrid plans for pylon network expansion Environment | Movember 15, 2013, 01:00 a, Co Kildare.There is now a repolt in rural! ...) Consultation on vital Eirgrid plans coming down Elegrid is embacking on three projects vital in securing per supplies The national grid is one of(...)

Figure 5.1 Media Reaction Dec 2013 - Jan 2014

A private member's motion brought forward in the Dáil calling for an independent international assessment of EirGrid's proposals, which was not accepted, led to increased media attention with senior politicians forced to debate the issues in the knowledge that local elections were less than 6 months away. The political solution was found in January 2014 when Minister established an Independent Expert Panel (IEP) to investigate the potential of placing voltage power lines underground. The investigation was expected to take eighteen months. EirGrid's immediate response was that it will conduct this comprehensive underground analysis and work with the independent expert panel to review all options before moving to the next stage of development.

In response to media criticism, EirGrid has made it clear that it has no vested interest in any particular technology solution. It, and the Commission for Energy Regulation (CER), has also made it clear that the underground solution will add significantly to the cost of electricity which will in turn add to the cost on consumers' bills for electricity.

From December 2013 through to January 2014 the press coverage became increasingly more critical of EirGrid's consultation process (Figure 5.1.).

Throughout the consultation period EirGrid's public response has been measured, accurate, informative and conciliatory.

The current situation seems to be that EirGrid believes underground cables will be a high cost to the Irish consumer and very difficult to install and maintain. Meanwhile residents along the route of the transmission cables think that, because of the cost to them in terms of property values, health and livelihoods, underground cabling may be worth the cost and effort. The issue is a "wicked problem" which, up to this point, EirGrid has dealt with in an appropriate manner using a clearly defined, well thought out and technically well executed public consultation process. However, a significant weakness was apparent as options were selected prior to meaningful engagement with the communities affected.

5.4 EirGrid Information Offices

Eirgrid has numerous Information Offices strategically located in rural towns where the local population is likely to be impacted by Eirgrid projects (e.g. Ballina, Castlebar, Ballaghaderreen, Carlow, Kilcullen, Midleton, New Ross, Carrick on Suir). SLR selected the EirGrid Information Office in Kilcullen as a representative example. The office was not easily accessible to the public. Although a sign had been placed outside on the street, the office was upstairs and could only be entered after pressing a buzzer. The first reaction was that the location was not easily accessible (for wheelchairs or buggies for instance) and the door security (although normal) a bit off-putting. The presentation material and story boards that were used in the open days were available to view and on the whole were very informative and helpful for a local resident who wanted to understand the issues. More importantly the EirGrid personnel on site were engaging, enthusiastic about Grid Link and what it meant for the Irish economy and local enterprise, and genuinely interested in answering questions.

If there could be any criticism it would only be a sense of defensiveness on the part of the EirGrid engineer who was probably expecting opposition and antagonism from an irate local resident. At that time the underground option had been considered in Stage 1 of the Consultation process and had been rejected on engineering grounds. This was explained very clearly by the engineer and the justifications given made absolute sense. Therefore when senior management announced some time later that EirGrid would revisit the underground/ overground decision it came as a surprise.

Overall the experience of the Information Office was positive, with the caveat concerning access to the office and the inconsistency of message over time.

5.5 Results of Direct Consultations

A small cross-section of stakeholder opinion was reviewed through direct telephonic and/or face-to-face contact with key individuals, representing community groups, farming and business interests, consultants, non-governmental environmental lobbyists, and other semi-state bodies. A broad list of consultees was agreed in advance with EirGrid, and most interviews were held on condition of confidentiality to guarantee open and honest feedback.

Several thematic issues were identified by the consultees (summarised on Table 5.1 below).

A key issue raised was that opposition to Grid25 reflects a need for a **participatory national debate on energy policy** and mechanisms for a transition to a lower carbon economy and society. Central to this is an awareness of the rights of citizens to participate in such policy-making under the Aarhus Convention, ratified by Ireland in 2012. Eirgrid acknowledges the

rights of citizens to participate in decision making to grant consent for projects to be carried out which are likely to have a significant effect on the environment.

The Aarhus Convention guarantees rights to citizens to access information on the environment and to participate in decision making relating to the environment, including decisions to grant consent for projects to be carried out which are likely to have a significant effect on the environment. Article 9 of the Convention covers projects requiring Strategic Environmental Assessment (SEA), Environmental Impact Assessment; Integrated Pollution Prevention and Control/ Industrial Emissions (IPPC/ IED) licences, including energy, infrastructure, waste, water and industrial projects.⁴

Many respondents were surprised both by the **vehemence** of the anti-Grid25 reaction at community level and that EirGrid did not appear to understand the level of societal change in attitudes. There was a general consensus that, irrespective of how well or badly the EirGrid consultative process had been rolled out, a **concatenation of issues has conspired to develop such a profound anger**: economic collapse, anger at government and state bodies; Corrib gas; hydraulic fracturing 'fracking'; the negative impacts of proposals for industrial scale wind farms in the Midlands in 2013 (Energy Bridge; Mainstream Energy etc) for export, and critically, the collapse in public trust in state institutions. The Midlands projects in particular had generated a level of ire among local communities at the 'top down' approach, where it was perceived by many communities and activists that the Government was facilitating 'big business' at the expense of local communities' environmental interests⁵. When all of these issues are combined, the developer, in this case EirGrid, is indeed facing a 'wicked problem' (see Section 5.1). This conflation of issues is exacerbated by the use of social media and the ease through which **misinformation** can be spread, sometimes without mal-intent but other times maliciously.

A number of respondents highlighted the contrast between the relatively unknown EirGrid and the high standing and brand recognition that the ESB has built up in the rural community over the years. In particular, the ESB Code of Practice in relation to access to land and/or premises in general and the issue of Wayleaves in particular was cited as a good example that was well established and regarded, in particular by the farming community.

The perceived lack of political support in delivering stated energy policy through Grid25 was raised by a number of respondents. Many felt that the issues we are facing in terms of energy security and supply, balanced regional development and climate change, require a longer-term response and Government at all levels needs to show leadership on this issue.

The launch of the Green Paper on Energy Policy in Ireland in May 2014 was a positive step in this regard and provides a timely opportunity for a wide ranging debate on these issues. The subsequent consultation period resulted in over 1,200 submissions, including detailed responses from many of the key stakeholders. Many of these went in the public domain, which in turn provided further data for those who questioned the whole rationale for Grid 25 at this time.

These themes and comments are summarised below (see Table 5.1).

SLR Consulting

⁴ www.engineersjournal.ie/aarhus-convention 29/09/14

⁵ Based on consultations undertaken by SLR for National Economic & Social Council: 'Wind Energy in Ireland: Building Community Engagement and Social Support' NESC No. 139 July 2014.

nal Energy Needs to be a new debate on national energy policy, informed by best practi	ce –
current policy is outmoded and has not taken account of recent economic an	
technological changes and has been delivered in top down manner. What so	ort of
energy mix does Ireland want?	
How can we deliver it while meeting our international obligations?	
Where does Ireland want to be in relation to climate mitigation?	
What sort of energy infrastructure do we wish to have?	
Need to develop a participatory, problem-solving energy strategy in line wit	
Irish society's goals. A sense that "we need to go back to the drawing board and start again" in relation to energy policy-making through open and	J
participative processes. The time between the closure of formal consultation	n on
the Green Paper on Energy Policy in Ireland and the formal launch of the W	
Paper at some time in 2015 provides just such an opportunity.	vinte
The lack of cohesive and strong political leadership on energy policy was	
commented on by interviewees across all sectors. Many deplore the political	
undermining and incoherent views of Ministers, TDs and local councillors rel	
to own party's stated policies when faced with local opposition.	
lative impact The level of anger directed towards Grid25 was in fact a conflation of other	
ues = the issues: the collapse of the economy; private debt; property prices; Midlands	
industrial wind farms; export of energy to UK; West of Ireland vs East; Corrib	
Gas; 'fracking'; anger and sense of powerlessness against state facilitating	
commercial wind developers; economic issues affecting the farming commun	nity;
lack of consultation – all leading to unprecedented anger against Grid25. Itative EirGrid came across as arrogant in delivery: consultation was not 'participati'	'
	ve .
EirGrid was 'telling' not 'listening' and did not take valid concerns on board. Consultation by EirGrid was overly legalistic and technical	
Consultation was delivered as 'done deal' – the options presented were not	
really options open for debate	
Contrast was made with other utilities (in particular ESB and BGE), who use	d
detailed local knowledge of representative rural organisations to evaluate	
possible routes well before any formal process was initiated.	
Technical decisions over-rode valid community fears and /or wish for a differ	ent
form of energy system.	
EirGrid did not use existing Forums such as Regional Authorities or local	
partnerships to engage with good effect. tion of Route Route options were presented for as many as 5 routes on Grid Link – some	
ns commented that a final presentation of one preferred option would not have	met
with such inflamed and widespread opposition. However, it was recognised to	
some that this could pre-empt true consultation.	,
Messages Change of EirGrid statements on under/over ground lines poorly received	-
Costed options and consequences	
Avoidance of 'own goals' would be helpful (EirGrid Chairman at PAC and rec	cent
comment on wind turbines by Environment Minister on WLR FM)	
Cost analysis – not only on grid itself, but also tourism, landscape,	
environmental, heritage costs/ benefits.	
Climate issues must be fully integrated – the cost of 'doing nothing'. All presented options need to be clearly costed with pros and cons	
Ilaneous Need to counteract misinformation circulating via web/ social media	
A range of energy mix options needs to be considered – can there be more l	ocal
distributed sources (AD/ Biogas/ GeoT) etc	Jour
Could there be focus on regional grids vs large monolithic pylons	
Use of ESB's longstanding involvement in, and knowledge of, the rural	
community, in contrast to the unknown EirGrid, would have facilitated the	
process. ESB's Code of Practice could provide a model.	

Table 5.1 Key Themes Emerging from Consultees re. EirGrid's Consultative Process

On the consultative process itself, the perception was that the approach adopted was too **technical and legalistic** in tone – thereby inaccessible to many non-technical people. Frequently, EirGrid came across as **arrogant and defensive** in delivery – surely unintentional, but such was the perception. Generally, the feeling was that the consultation process was not truly 'participative' in that EirGrid was '**telling' not 'listening'**, and delivering a '**done deal'** without taking valid concerns on board. The feeling was that technical considerations took priority over strongly felt community fears, many of which may be ill-founded, but nonetheless need to be addressed.

There seemed to be no recognition by EirGrid that the rural/farming community was being required to host the infrastructure – it effectively had no choice. Another utility starts from the principle that 'They didn't ask us to come' and that detailed advance engagement with the farming community and its representative body is essential, prior to development of route options.

It was felt that the EirGrid projects, no matter how well delivered, would encounter opposition as many NGOs and community activists are seeking a decentralised form of energy system(s), with a focus on **increased efficiencies and reductions in energy consumption**, to achieve a low carbon economy. They perceive that a monolithic 'silver bullet' pylon infrastructure is embedding fossil fuels in Ireland's energy systems for the medium to long term, is a retrograde step.

There was a suggestion that EirGrid did not effectively **use existing forums** such as the relevant Energy Agencies, County Community Forums and/or local partnerships such as People's Energy Charter, Environmental Pillar or Transition Towns' networks to engage in a more fully participative manner to achieve its objectives. Reference was also made to the need to engage with the reconstituted Regional Assemblies.

On 1st June 2014, the eight *Regional Authorities* in Ireland were dissolved and are now incorporated into the **Regional Assembly** structures. For example, the former South West Regional Region which consisted of the administrative areas of Counties Kerry, Cork and Cork City is now part of the Southern & Eastern Regional Assembly. New regional structures will be established on 1st January 2015. The main functions of Regional Assemblies are to:

- prepare and oversee the implementation of Regional Planning Guidelines;
- monitor the delivery of the National Development Plan & EU Structural Fund assistance in the regions;
- promote the co-ordination of public service provision in the region.

There were many comments concerning the **mixed communication messages** and 'own goals' over the period of the EirGrid consultation phases, particularly in relation to the overground vs underground options for the grid roll out. The **costs of each option** need to be clearly communicated: for every action there is a consequence; for every consequence there is a cost. This needs to be translated to €xx / per household/ per business per annum, in order for people to grasp the real costs of the full range of options in order to make fully informed contributions to the debate.

There was a feeling among respondents active in the energy sector that many in the community did not appreciate the technical complexities of the transmission system and therefore sought simplistic answers: however, the challenge for the EirGrid consultative team is to translate complex language into intelligible information to overcome fear and misinformation. The potential **health issues**, in particular relating to Electric and Magnetic

Fields (EMF), were cited as an example of this. 'Near neighbours' adjacent to pylons and expanded sub-stations, as well as the farming and equine communities, had particular concerns over the long terms effects that EMF might have on human and animal health.

Finally, there was a query as to **whether we now need the Grid25 project** at all? Can we deliver Ireland's renewable energy targets and transit to a low carbon economy without it? This question was asked by senior practitioners in the energy sector as well as community activists. Information published by some consultees to the Green Paper on Energy Policy in Ireland has raised the credibility of this query further.

5.6 Comparison of Public Consultation by other Sectors

Based on its experience of public consultation, SLR (Ireland) reviewed SLR UK's experience in working with National Grid and also of its colleagues experience in developing oil sands projects in Alberta, Canada. We particularly focused on mechanisms used by other players in developing large scale infrastructure.

5.6.1 Citizen Engagement in Wind Energy Policy

The National Economic and Social Council (NESC)⁶ has set out a pathway for increased decarbonisation of Irish society through public involvement in design of energy systems, to achieve a cultural shift in energy generation, reduction and efficiencies. It recommends three components for **social support of energy projects**:

- 1. An intentional, participatory, and problem-solving process (which underpins the German and Danish energy models), which is part of a national discussion to design an energy policy and implementation strategy that is in line with society's goals.
- 2. An effective, open and inclusive process of public participation;
- 3. Enabling and intermediary organisations which support the kind of problem solving and entrepreneurialism necessary to initiate renewable energy options.

NESC suggests **four key tools for improved citizen engagement** in energy transition, which are relevant in the consideration of EirGrid's consultation process:

- Incorporation of progressive solutions into the design of energy solutions locally, including shaping of local benefits and value-sharing;
- 2. Inclusive processes for consultation and participation in problem solving through community energy forums;
- 3. Engagement and resourcing of intermediary organisations to bring expertise, facilitation and support for energy possibilities in a given area;
- Linking of locally negotiated outcomes and energy plans to a key national institution such as SEAI, to validate local agreements and create a process of benchmarking nationally.

While not fully applicable to rolling out Grid25, there is considerable international experience represented in these suggestions, which could be adapted as EirGrid moves forward.

SLR Consulting

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⁶ Wind Energy: Building Community Engagement and Social Support, NESC No. 139, July 2014.

5.6.2 Citizen Engagement with Local Government

The recent report of the Working Group on Citizen Engagement with Local Government (December 2013)⁷ presents an interesting model for citizen engagement in public decision making, based on a review of European practice and recommendations of the Council for Europe.

A new Public Participation Network (PPN) is currently (October 2014) being established for all local authority and municipal areas in Ireland, to provide a representative and collaborative approach to developing economic, environmental and heritage etc policies at local level. The model for PPN is based on extensive research in public decision making for delivery of utilities infrastructure. It is clear that participatory decision-making takes considerably more time than unilateral decision-making. However, this is offset by the gain in time at the implementation phase8. Thus, the time is lost upfront, not at the implementation phase, which allows for more effective and predictable commissioning of projects, typically at lower cost (see Figure 5.2 below).

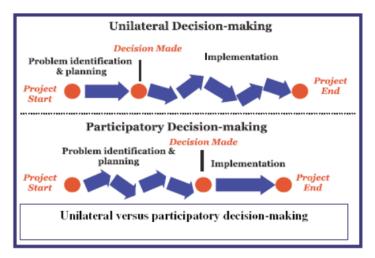


Figure 5.2 Model for Effective Participative Decision Making

While the PPN are focused on local government, these will provide an excellent mechanism for active civic engagement with national policy as it affects the citizens in any given area.

5.6.3 National Grid UK

SLR Consulting UK provided extensive support to National Grid UK to inform the development of the company's North West Coast Connections project, which started its second round of public pre-application consultation on 4 September 2014.

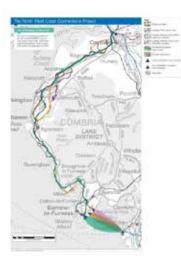
The Nationally Significant Infrastructure Project (NSIP) is the largest that National Grid has undertaken in the UK since the electricity transmission system was first constructed, to

http://www.environ.ie/en/Publications/Community/Community/VoluntarySupports/FileDownLoad,36779

<u>en.pdf</u> ⁸ HarmoniCOP Handbook, 1, 2, 3

extend its network to connect new sources of electricity generated from low carbon sources. It will link Moorside – the proposed new nuclear power station to be built near Sellafield in West Cumbria and an offshore wind farm(s) in the Irish Sea – into the existing electricity network in Cumbria and Lancashire.

The project team identified a number of route corridors taking into account a wide range of environmental, socio-economic, technical constraints and cost considerations. The project considered a range of potential impacts including landscape, ecology, archaeology, soils and geology, hydrology, planning, transport and acoustics. A 'Compliance Filter' was applied to all early options prior to going public. Options were generally not ruled out on technical grounds too soon, while allowing the public to have an input at this early stage. The challenge was to identify connection corridors, with minimal impacts. A key aspect of this was the establishment of National Grid's Stakeholder Steering Group made up of county and local authorities from across the Cumbria region, as well as key organisations such as the Lake District National Park Authority, Natural England and English Heritage, who helped to shape the development of the project.



Opportunities constraints and evaluated for both onshore and offshore High Voltage Direct Current options. This considered National Grid's Holford Rules on overhead line routeing, together with environmental socio-economic and constraints and sensitivities. The emerging preferred option, which is the subject of a consultation phase launched in September 2014, would see a cable tunnel constructed under Morecambe Bay. This option strikes a good balance between the environmental, socio-economic technical and considerations and avoids impact on parts of the National Park and many other designated areas in the area around the head of Morecambe Bay. The public can input to the National Grid's prioritised routes.

Ostensibly, EirGrid adopted a very similar process to the UK National Grid experience in consulting widely with communities, landowners, NGOs, enterprise and energy developers, and members of the Grid Development Team have spoken directly to their UK counterparts, who agree. Public consultations and engagement focused on parish councils, town hall meetings, focus groups and individuals, with an 'active listening' mode adopted and changes made accordingly. It is significant however, that National Grid formed a strong multi-party, representative Stakeholder Steering Group, which could always be referenced as issues arose among the public. Having powerful intermediary groups for e.g. landscape, heritage and environment such as Natural England on board lent strength to National Grid arguments for facilitation of e.g. offshore renewable energies.

Publicly accessible, non-technical data are presented on the dedicated Northwest Coast Connections home page http://www.northwestcoastconnections.com/, rather than buried in the parent National Grid website. The clear presentation of data and the ease of participation online in 'have your say' forums and in formal consultations is simple and easy to use.



The demographics of northwest England and exceptional scenic beauty posed particular challenges. The spatial planning process is significantly different, where one-off rural housing is generally not allowed, meaning that grid corridor options did not have the same direct impact on rural homes as would have been the case in Ireland.

The political system (one MP per constituency) in the UK is such that local politicians tend to be less disruptive of national policy, leading to more cohesive delivery and public acceptance of agreed policy. This reinforces the need for strong political leadership at the highest level in Ireland to assist in delivering national policies such as Grid25.

5.6.4 International Resources: Gaining Consent

Achieving consent (social licence to operate) for a large scale resource (mining, oil and gas) project is complex and becoming increasingly so as the public are better informed through the internet and connected through social media.

SLR operates internationally in the energy and minerals resources sectors and has worked with public and private clients, including the EU and World Bank, on a number of consultative processes in Canada, USA, Australia and across Africa. These processes vary hugely from country to country, depending on the level of economic development, the presence of aboriginal and native communities, and the general level of popular acceptance of the need for resources development. Communication processes and materials have to be adapted to each setting.

The International Council for Mining and Metals (ICMM www.icmm.org) has addressed the problems facing developers of projects and the need for more participative mechanisms for engagement with communities and impacted interests. The complexity of gaining consent, through appropriate representation (possibly only dealing with the 'gatekeeper', thus potentially splitting communities), dialogue and fair compensation requires transparency, benefit sharing, and fundamentally the building of trust among all parties. Strong government can be a huge benefit in supporting the project proposal; the corollary may be so in the absence of leadership in government.

Consent - what constitutes consent? Benefit-sharing - what role for companies and what are the best How to get to it? mechanisms? Representation - Who represents Capacity - what support do communities? communities and companies need and who provides it? Compensation-how to compensate Trust and understanding-what for intangible losses? processes are required? Transparency - How much is enough? Government - what if Government is absent or weak?

The need to engage openly to build trust with impacted stakeholders means that any commitments given must be recorded and delivered. Mechanisms for sharing community benefits or funds need to be teased out, many of whose beneficiaries may be involved in deciding how that fund should be administered.

Thus, from EirGrid's perspective, the 'wicked problem' facing development of Grid25 projects are universal and continue to pose challenges for project developers internationally. At the end of the day, companies must be open to collaboration, changes of plans and to meeting stakeholders half-way in terms of planning the project.

The ostensibly cheaper technical option at the start may prove to be very costly in the medium to longer term if the project is prevented from getting underway, while early, time consuming but effective participative mechanisms may allow a more direct implementation route, thus saving time and money (see Figure 5.2). The example of the Corrib gas field, which was originally expected to commence operation late 2003/early 2003 and is now expected to come onstream in 2015, bears witness to this. The capital cost of the project at that time was estimated at \$714 million⁹ - a recent report estimates the current cost at €3.4billion¹⁰ – well over \$4billion.

5.6.5 Transparency of Corporate Social Responsibility

A recent comprehensive analysis was undertaken on the transparency of Corporate Social Responsibility (CSR) measures for 200+ resources (mining, oil and gas) companies listed on the London Stock Exchange and AIM markets. The website of each company was assessed on nine measurable transparency criteria to determine the level of demonstrable practical commitment to social engagement versus paper statements.

On a scale of 1-10, the largest multinational companies achieved the best scores of 7-8 on the Transparency Index reflecting the resources available to deliver sustainability, CSR and community gain measures. Many of the medium – junior capitalised companies scored in the lower ranks (3 or under).

¹⁰ Irish Examiner 21 July 2014

⁹ Wood Mackenzie

SLR used these criteria to analyse EirGrid's own website and the transparency of its CSR commitments. EirGrid scores 4 (out of 10) on the Transparency Index (see Table 5.2 below). This reflects the need for significant improvement by the company in both the development and transparency of sustainability reports and KPIs, disclosure of the specifics of EirGrid's CSR projects, regional spend and community gain initiatives.

It is noted that the SLR researcher had to 'dig deep' to locate the relevant documents to assess the company's transparency – EirGrid would benefit from having CSR information at a higher level on the website in a 'single click' repository.

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			and Breeze a consideration of the constraint of the best of the constraint of the co	The state of the s					
		2. Demonstrated	3. Shown how Capital was	designed on basis of Community	5. Sustainability Report	6. Updated CSR more	7. Disclosed Commitment or	8. Set revenue	9. Sustainability Statement
	Projects					annually	principles		
Qualifier	Any disdosure of spend	Any disclosure on 1 or	Any clear disclosure of how total CSR	"Mawns Aguntumoo agpeds to europsig see;"	Any document dearly	Any clearly dated news or	Any disclosed commitment to	A score was obtained	Any kind of public statement on CSR or
		more specific CSR	spend was distributed across the	part or orgoing was sufficien, and/or appt of	demarcated as a	updates on CSR activity	external principles or guidelines	•	corporate conduct towards communities
		projects conducted by	company's operations	Community Liston Officer sufficient to score Yes.	Sustainability Report since	acored (blogs/	scored e.g. UN prindpels/ Aarhus/		or local shareholders score dof this
	or funds	Company. The use of		Non-spedfic community engagement mentioned	2012 that can be downloaded	newsletters etc).	ICMM. Self mendeted principels	smount or % of comeny	category. Statements making
		vegue 'meny projects'		as part of corporate values did not score.	or read from website. While		did not score even If of high	revenue or profits to be	commitments to shareholders, EHS
		300783 28FO			some CSR statements are		quality.	spent on CSR activity	standards or against corruption were not
					better than the SR, these are			over any given period of	Induded.
					not sustaballly reports and			time.	
Comment:			EirGrid is proposing a community	Grid West (since 2012) : EirGrid has		The Grid25 projects	(I) The EirGrid Project		Eirgrid define a customer as anyone
Grid 25			gain mechanism with two	completed 5 rounds of public consultation,		are being	Development and		to whom we provide a service. This
			elements: (i) community fund of	hosted 27 open days and engaged with the		implemented across	Consultation Roadmap takes		includes all Demand customers,
			640,000/km for impacted	public and stakeholders through various		ireland and affect a	cognisance of the Advitus		Renewable Generators and
			communities and (ii) proximity	fora. In October 2013, EirGrid announced		large number of	Convention and its UNECA		Conventional Generators who are
			•	details of an emerging preferred overhead		people. Eirgrid	Convention implementation		connected to the Transmission
				route corridor for Grid West running from		outlined a roadmap	Guide.		System, Suppliers, Stakeholders and
			properties (or those with full	NW Mayo to Flagford in Roscommon, in June		for these projects, and	(II) Achieved 'Business		all other interested parties.
			planning permission) within 200m	2014, ErGrid announced details of an		the opportunities for	Working Responsibly' Mark -		
			from the closest point of the	emerging preferred underground corridor		public participation	awarded by Business in the		Our Customer Relations Team aims to
			property to the centre of the new	option also running from north-west Mayo		throughout. We	Community. (III) All		provide professional, reliable, and
			400 kV lines or within 200m from	to Flagford, Co. Roscommon. The		received feedback that	requests for information & the		efficient assistance and support to all
			a new rural station or converter	protection of the health, safety and welfare		consultation process	public have defined rights		of our customers. We provide to all
			station.	of the public and our staff is a core value.		could be improved.	under European		customers a single point of contact to
			III For 400 kV lines there would be	That is why Eirgrid provide clear, factual		We are keen to	Communities (Access to		facilitate the processing of all their
			a payment of 630,000 for	information on electricity transmission lines		respond positively to	Information on the		queries and comments.
			would	and the latest research into any suggestion		this feedback and will	Environment) Regulations		
				that they could have implications for human		conduct a thorough			
			65,000 at 200m.	health. Grid Link (launch 2012) - 3 public		review of our	(iv) Efforts are made to		
				consultations; 33 open days; 5		consultation process	minimise impacts by sensitive		
				PublicInfoCentres		to enhance future	routing in accordance with		
						public engagement	best practice CIGRE and		
							Holford Rules		
Yes/ No	N	N	Y	A	N	N	γ	N	*
Scoring (out of 20)	۰	0	-		•	•	-	0	-
· ·	http://www.car21.org/co	/www.csr21.org/content/csr21-transparancy-index	op-Index						

Table 5.2 EirGrid Ranking on Transparency Index of Commitments to Corporate Social Responsibility

6.0 CONCLUSIONS

The following conclusions may be drawn:

- A national broad-based debate is required on Ireland's energy policy. Current energy policy is perceived by the public as outdated and not fit for purpose for a decarbonised economy.
- 2. EirGrid is mandated to deliver the roll out of the transmission grid upgrade in the context of current energy policy, but has been left largely isolated in doing so.
- 3. There is a need to respond to societal concerns in partnership with other Government agencies to deliver national policy objectives.
- 4. EirGrid is operating within a rapidly changing social environment in which the 'goal posts' have shifted inexorably in the decade since national energy policy was developed. New and effective engagement mechanisms need to be developed by the company to be flexible and less legalistic/ technical in approach. A new participative process, with earlier and open engagement, is required prior to development of grid plan options.
- 5. EirGrid's website is technically excellent, but is not geared towards the average non-technical citizen. It is not clear on the website that EirGrid is acting in the public interest and its corporate social responsibility commitments are buried too deeply in the site. The 'Grid25 Projects' section, while offering excellent technical information, would benefit from being loaded to a separate, more citizen friendly website, albeit linked to the parent site. There is no online structured mechanism for feedback to consultative phases.
- 6. EirGrid's Roadmap and public consultation process are good technically, whereas the tone is overly legalistic-technocratic. EirGrid's approach is to 'consult' with predeveloped options versus active participation and input to the design of the options. The perception abounds that transmission line options as presented were a 'done deal' prior to the consultation process.
- 7. EirGrid did not work effectively with existing forums such as county Community Forums, Regional Authorities (assemblies), pro-renewable environmental groups and Transition networks, or with a permanent representative Steering Group. It is imperative to win the reasonable 'middle ground' in rural Ireland.
- 8. Ambiguous messaging has created doubts in the public's mind about the grid options and potentially undermined trust in EirGrid's intent. Messaging must be clear and unambiguous particularly in relation to the overground vs underground options, with clear presentation of consequences and costings for the consumer.
- 9. EirGrid is facing the 'wicked problem' of the concatenation of multiple issues leading to excessive anger and upset at the proposed grid infrastructure. However, this must be actively managed through effective communications of the critical nature of the grid infrastructure and the need to meet national responsibilities to mitigate the impacts of global climate change.

7.0 RECOMMENDATIONS

The following recommendations may be made:

- 1. Consider development of a separate Grid25 website that is linked to the parent EirGrid site, but as a stand-alone, citizen friendly interface (consider National Grid UK).
 - a. Keep the language non-technical at the higher levels,
 - b. Make it clear that EirGrid is delivering public policy for the public good.
 - c. Have excellent and up-to-date FAQs, delivered in non-technical language.
 - d. Develop online mechanisms for structured consultation and 'have your say' forums.
- Clarify the messaging. Have clear and unambiguous, non-technical summaries of all proposals. These should be available within '6 clicks' of entering the website and easily downloadable as pdfs.
- 3. Establish a Representative Steering Group to include national organisations such as Engineers Ireland, Fáilte Ireland, IFA, ICA, An Taisce, Friends of the Earth, to provide policy inputs and direction on all aspects of grid roll out.
- 4. Make better use of existing forums such as:
 - Advance engagement with landowners, the core stakeholders as 'host' to the pylon infrastructure, through organisations such as IFA, ICMSA and Macra na Feirme.
 - b. Community Forums in each county;
 - c. The new Regional Assemblies to deliver their mandate in terms of balanced regional planning and infrastructural provision.
 - d. Improved engagement with local leaders in intermediary rural organisations (e.g. GAA, ICA, Muintir na Tíre, county based Energy Agencies like TEA, etc) to win the middle ground.
 - e. Improved engagement with proactive environmental NGOs such as Environmental Pillar (of Aarhus); Laois Energy Action Forum (LEAF); the People's Energy Charter network and other pro-renewable energy NGOs and recreational interests e.g. Irish Uplands Forum.
 - f. Engagement with Chambers of Commerce, Fáilte Ireland, Equine, Quarrying, IWEA interests to win business support for the grid.
- Consider appropriate approach to public meetings. Collaborate with intermediaries for them to host meetings while maintaining EirGrid control of the agenda, independent chairing, logistics and venue.
- Initiate a national communication programme to connect national policy with the implementation of Grid25 projects. Request relevant government departments and other statutory agencies to actively support EirGrid. This is a national issue that affects all

industrial infrastructure and energy projects and more support is required. EirGrid should not be left out on its own.

- 7. Consider MIRA and/or environmental economics to help the transparency of the selection methodology.
- 8. Consider getting buy-in to EirGrid's selection methodology for options at Stage 1 from selected stakeholders and intermediaries e.g. Regional Assemblies, Engineers Ireland, Fáilte Ireland, IFA etc. This will help the transparency issue.
- 9. Modify the legal-technocratic approach. The consultation process is good, but there is defensiveness palpable in the EirGrid communications, a sense of "speaking at" instead of "speaking to" people. This is a natural attitude for well educated experts who have painstakingly considered all the options and have reached a logical conclusion. This sense that "we know what the end game is", whether it is true or not, is felt by stakeholders that engage with EirGrid.

8.0 BEST PRACTICE MATRIX FOR COMMUNITY ENGAGEMENT

Based on the findings of the desktop study, output from the workshops, a review of international community engagement practices in energy and other industry sectors together with research undertaken on international projects for the National Economic and Social Council (NESC) a Best Practice Matrix for Community Engagement (Figure 8.2) is provided below as a guide to future public consultation, together with suggested possible tools.

The matrix is designed to guide EirGrid personnel in selecting the most appropriate approach to stakeholder engagement and the tools that might be used to facilitate the most appropriate level of public participation. The matrix combines stakeholder mapping with different levels of public participation. The different levels of public participation and the possible tools to be used for each level, from informing to empowering, are shown in Figure 8.1.



Figure 8.1 Public Participation Spectrum

(from: International Association for Public Participation, 2000)

The goal of the consultation, to inform, consult, involve or collaborate, is influenced by the potential level of impact the stakeholder has on the implementation of the EirGrid project in question.

In the aftermath of the 2008 financial crisis the Irish public lost their trust and confidence in the system (the professions, the church, banking, big business and the political system).

From now on public consultation must be designed to build and restore that trust. It is acknowledged that public empowerment may not be feasible. There is no short term solution. Figure 8.2 seeks to illustrate this trust building approach.

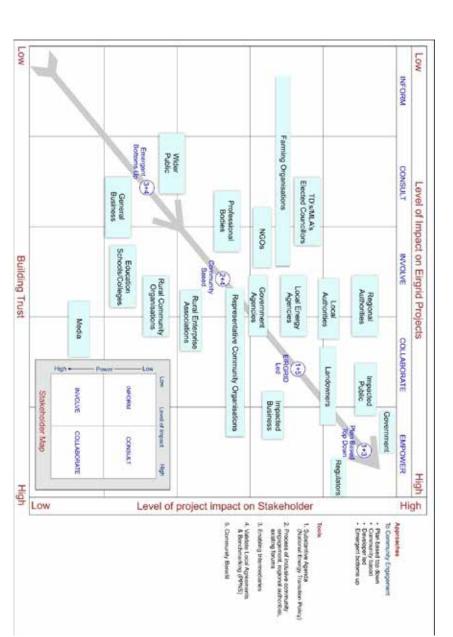


Figure 8.2 Best Practice Matrix for Community Engagement

The general public, whose homes are not directly impacted by any of the EirGrid projects, need to be informed about EirGrid projects through fact sheets, websites and briefings. They may be mobilised for or against EirGrid projects. The general public will have opinions on national energy transition policy and world climate change. If energised they seek to influence their public representatives through community organisations, NGOs, professional bodies and schools/colleges. This is the emergent/ bottom up approach that leads to community based engagement. This is the "middle ground" where EirGrid should go beyond informing and consulting to involving and collaborating.

EirGrid's Consultation Roadmap Stage 1 should involve and collaborate with professional bodies, rural enterprise associations, rural community organisations, elected councillors, NGOs and colleges to manage expectations and obtain acceptance and "buy in" to the methodology that is being developed to identify feasible options. If there is an acceptable level of "buy in" to the methodology by the middle ground, before emerging preferred routes are identified, there is a higher probability that the general public, the impacted public and impacted businesses will collaborate with EirGrid to find solutions acceptable to all parties.

This may involve community benefit and local agreements that are validated by empowered intermediaries such as SEAI through local, county-based Energy Agencies, for example.

The matrix clearly demonstrates the need for a plan-based, top down, National Energy Transition Policy to support EirGrid's upgrade of the transmission infrastructure with ongoing support from other government energy agencies and departments.

9.0 CLOSURE

This report has been prepared by SLR Consulting (Ireland) with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of EirGrid plc. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

10.0 REFERENCES

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