

**Christopher Osborne**

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**From:** McMillan, Sandra <Sandra.McMillan@detini.gov.uk>  
**Sent:** 09 October 2009 13:20  
**To:** Christopher Osborne  
**Cc:** McKernan, Malachy  
**Subject:** NORTHERN IRELAND RENEWABLES OBLIGATION: CONSULTATION ON PROPOSED CHANGES [Scanned]  
**Attachments:** Cover letter to Stakeholders for NIRO Statutory Consultation (PDF) (091001).PDF; CONSULTATION ON PROPOSED CHANGES TO THE NORTHERN IRELAND RENEWABLES OBLIGATION - 2010 (PDF).PDF

Hi Christopher

Your e-mail to Malachy below refers. I have checked our e-mail issue for the above-named consultation. E-mails were sent to the following at UFU:

[csmith@ufuhq.com](mailto:csmith@ufuhq.com);  
[wesley@ufuhq.com](mailto:wesley@ufuhq.com);

I have now updated our mailing list with your details.

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I attach copies of the documents issued in relation to the consultation.

If you required any further information, please do not hesitate to contact me.

Thanks

Sandra

**Sandra McMillan**  
Sustainable Energy  
Department of Enterprise, Trade & Investment  
Netherleigh  
Massey Avenue  
Belfast, BT4 2JP  
Tel: 028 9052 9240 (ext: 29240)  
Textphone: 028 9052 9304  
Web: [www.detini.gov.uk](http://www.detini.gov.uk)

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**From:** Christopher Osborne [mailto:christopher@ufuhq.com]  
**Sent:** 09 October 2009 10:17  
**To:** McKernan, Malachy  
**Subject:** UFU position [Scanned]  
**Importance:** High

Good morning Malachy,

I am currently putting the finishing touches to our response to the "DECC" consultation on Renewable Electricity Financial Incentives in GB and just wanted to give you a heads up on the UFU's position. Main reason for this is that we would never wish for our viewpoint to be perceived as either awkward or unconstructive. Rather I would like to hear your views on our position as this will mean that we have a platform for going forward,

The UFU have concerns about several key aspects and they are all interlinked;

In our reply to the Strategic Energy Framework we expressed the view that the draft document was not far-reaching enough and that the document is long on rhetoric but short of decisive action going forward. For a number of years the UFU have believed that there is a need to review the current Northern Ireland electricity grid infrastructure. We had met previously with DETI and asked that alternative electricity grid proposals should also be considered in particular a Distributed Grid. The inefficiency of the current grid means that any move towards replacing fossil fuels with renewable resources in the current circumstances could be a pointless exercise.

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The UFU also highlighted several disparities between Northern Ireland and mainland GB in terms of Financial Incentives on offer. For example, in GB producers are able to avail themselves of what is known as Feed-In Tariffs (FIT's), which are not available here in Northern Ireland. FIT's are available to small low-carbon generators.

The UFU are aware that there are no legislative powers in NI to introduce FIT's, hence we are calling on the Government to consider introducing legislation which will allow them to do this.

In the second consultation "Renewable Electricity Financial Incentives", the UFU will be calling for these instruments (in particular FIT's) to be applied across the United Kingdom, including NI, not just the mainland. This will ensure that no company (in any sector) will be at a competitive advantage. The DECC consultation says that FIT's are being extended in GB, to open-up low-carbon electricity generation beyond traditional energy companies and make it more cost effective for smaller parties/groups to take part. The UFU believes that there are significant opportunities for farmers and we will be stressing that the same should apply to Northern Ireland. The UFU will also be using this opportunity to call for a review of the electricity grid infrastructure in Northern Ireland.

In terms of the Bioenergy Action Plan, which is the third consultation, we will be replying to Barbara Swann before 31 October. UFU members have a clearly defined role to play in Bioenergy with the natural resources as well as input and outputs associated with farming and this could in the future form an integral part of

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farming practices. However, it will be difficult for any Bioenergy Action Plan to work if the Strategic Energy Framework is not far-reaching enough.

A non-DETI contact has alerted me to the consultation entitled "Proposed changes to the Northern Ireland Renewables Obligation" and this will be obviously linked to this response. However, I am slightly concerned that in our role as the main representatives of the land-based sector, this document was never sent to us and I would be grateful if you could have your contact details amended to include myself in any future correspondence.

I look forward to hearing from you in due course.

Chris Osborne  
Policy Officer

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