

Consultation on Developing a Hydrogen Strategy for Ireland
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Our Ref: EPAC Reference 21.22

Re. Consultation on Developing a Hydrogen Strategy for Ireland

To whom it concerns,

We acknowledge your notice, dated 12th August 2020, in relation to the Consultation on developing a hydrogen strategy for Ireland (the 'Strategy').

The EPA welcomes the prioritisation of the development of an integrated hydrogen strategy for Ireland in line with Ireland's Climate Action Plan. We note that the consultation process aims to gather the views of stakeholders and interested parties which will inform the development of this strategy.

We note that the EU hydrogen strategy, "A Hydrogen Strategy for a Climate Neutral Europe" was published in July 2020, and sets out a pathway for hydrogen to become an intrinsic part of an integrated EU energy system as it has the biggest decarbonisation potential and is therefore the most compatible option with the EU's climate neutrality goal.

The EPA welcomes the prioritisation of green hydrogen production sustainably produced from renewable sources outlined in the consultation document.

General Comments on the Strategy

The Environmental Protection Agency (EPA) comments refer only to matters within the remit of the Agency.

1. The EPA is responsible for protecting, improving and restoring our environment through regulations, scientific knowledge and working with others. Within this role, the EPA is the statutory authority for the implementation of the requirements of the Industrial Emissions Directive (the IED).

The IED aims to achieve a high level of protection of human health and the environment taken as a whole by reducing harmful industrial emissions across the EU, in particular through better application of Best Available Techniques (BAT). Installations undertaking the industrial activities listed in Annex I of the IED are required to operate in accordance with a licence (granted by the EPA). The IED is transposed into Irish law via the Environmental Protection Agency Act 1992 as amended. Class 5.13 of the EPA Act (Class 4.2 of Annex I of the IED) lists the following activities as requiring an EPA Licence.

5.13 The production of inorganic chemicals, such as:

- (a) gases, such as ammonia, chlorine or hydrogen chloride, fluorine or hydrogen fluoride, carbon oxides, sulphur compounds, nitrogen oxides, hydrogen, sulphur dioxide, carbonyl chloride,

Green hydrogen production installations will therefore require assessment and authorisation under the EPA's licensing process. Information on this process can be found on the [EPA's website](#)¹. Information on the BAT applicable to these installations can be found on the European Commission [website](#)².

The EPA licensing requirements and the environmental considerations required by BAT needs to be considered early in the planning process.

2. In relation to the health and safety requirements of green hydrogen, the Health and Safety Authority of Ireland (HSA) is responsible for identifying Upper and Lower tier Seveso sites in Ireland (S. I. No. 209 of 2015). The HSA, as the nominated Central Competent Authority, is charged with the enforcement of the regulations. Hydrogen is listed in the Seveso regulations for which the lower tier threshold is 5 tonnes.
3. It is also necessary to have regard to spatial planning considerations for green hydrogen infrastructure. These developments will have a long-term life span and will be a critical element of our response to the climate crisis and will likely be commonly located in coastal locations. It is therefore probable that this infrastructure would be at risk from climate-driven impacts in future such as rising sea levels, increased magnitude and frequency of extreme events such as wave surges, flooding of various types and heatwaves. As long-term, climate action-related infrastructure with an exposure to climate risks, it is essential that this infrastructure is designed from the outset to be appropriately resilient into the future. Therefore, this strategy should put

¹ www.epa.ie/our-services/licensing/

² <https://eippcb.jrc.ec.europa.eu/reference>

resilience and adaptation implementation at the heart of its approach to the spatial and operational planning processes

4. You should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment Directive (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the plan-preparation process.

We also refer you to the *EPA Synthesis Report on Developing A Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland* (and the pre-screening check contained within) to assist you in considering whether SEA is required for the Plan³.

Should you have any queries or require more detail on any of the aspects raised in this letter please contact Niamh O'Donoghue at N.ODonoghue@epa.ie

Yours sincerely



Sharon Finegan,
Director
Office of Environmental Sustainability

³ <https://www.epa.ie/publications/monitoring--assessment/assessment/synthesis-report-on-developing-a-strategic-environmental-assessment-sea-methodologies-for-plans-and-programmes-in-ireland.php>