



Northern Ireland
Assembly

**COMMITTEE FOR
ENTERPRISE, TRADE AND
INVESTMENT**

**OFFICIAL REPORT
(Hansard)**

Renewable Energy Inquiry

21 October 2010

NORTHERN IRELAND ASSEMBLY

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Members present for all or part of the proceedings:

Mr Paul Butler (Deputy Chairperson)

Mr Leslie Cree

Mr Paul Frew

Mr Paul Givan

Mrs Claire McGill

Mr Gerry McHugh

Mr Sean Neeson

Witnesses:

Ms Kirsty McManus)	IBEC-CBI
Mr Nigel Smyth)	CBI Northern Ireland

The Deputy Chairperson (Mr Butler):

With us today are Nigel Smyth and Kirsty McManus. Thank you very much for attending. We have your written response. I will throw open the session to you and then to members for questions.

Mr Nigel Smyth (CBI Northern Ireland):

Thank you. I am the director of CBI Northern Ireland. I am joined by Kirsty McManus, who is the programme manager in the IBEC-CBI joint business council. I apologise on behalf of Reg McCabe, who is unable to join us because he came down with a throat infection and, so, did not

come up from Dublin. I will make a short statement, then Kirsty will make some introductory remarks, after which we will be delighted to answer your questions.

We welcome the inquiry and the opportunity to provide evidence to the Committee. As the Committee is aware, energy policy is a key issue for our members in Northern Ireland. The development of the renewables market is of significant interest to us, and we believe that there are significant opportunities for the economy. The joint business council has been actively involved in that area of work and, hence, our submission has come through the council. Kirsty will make a few comments about that shortly.

CBI is keen a promoter of the need to reduce the carbon intensity of energy production. We have taken a leading role at a national level around the climate change agenda.

We recognise that there are significant wind resources, in particular, on the island of Ireland, which we are keen to tap into. However, it needs to be cost effective. Grid investment needs to proceed timely and at the lowest cost. We remain very worried about whether the planning system can facilitate the necessary investment in the appropriate timescale. We also see opportunities for biomass, anaerobic digestion and energy from waste.

Our members are concerned about competitiveness and about ensuring that energy costs are no higher than they need to be. Many argue strongly, and with strong supporting evidence, that prices in Northern Ireland are already too high. Policymakers must bear that in mind when considering supports and incentives that will be paid for by customers.

We believe that Government support by way of the renewable energy obligation is the best long-term policy instrument. Any modifications should be orderly and be signalled in advance so as not to undermine investment plans. The renewable heat incentive (RHI) is being taken forward in Great Britain, and we are keen to see it progress in Northern Ireland while recognising that there are tensions between maintaining competitor prices and using any form of customer levy to stimulate the market.

We do not see micro-generation as being a cost-effective technology at present. We do not believe that a case has been made for it to receive public subsidy. That is highlighted in our submission. We believe that cost effectiveness must be a key driver of policy.

We support the strategic energy framework as part of the overall energy policy. The final report, which was published a few weeks ago, is more specific and more focused than the draft document. We also recognise that it is only a framework. We agree with the report's four pillars: competitive markets; security of supply; sustainability; and the importance of infrastructure development. We support the renewable target that has been set; it will be particularly challenging in light of the demands of planning. The Government could and should do more to incentivise investment by companies, particularly in energy efficiency, but also in renewable energies, perhaps through some form of rating rebate. In our submission we have outlined a specific proposal on the achievement of the Carbon Trust standard. We also accept that the Government should lead by example, but their track record is not particularly good.

I will move on to planning. We are extremely worried that, without some radical changes, the target for renewables will not be met. Planning policy statement 18 has been welcomed and has helped those who have sought to build wind farms. However, without the necessary grid, there will be a problem. We are likely to get to within 50% to 60% of the renewable energy target, using existing infrastructure and with some modest strengthening and better use of technology, but that is going to leave a substantial gap, even if a major biomass plant is built in the next few years.

The delays with the North/South interconnector are a reflection of what we might face. Delays there are costing customers on the island of Ireland an estimated £20 million a year. We understand that a public inquiry on that matter will not take place until 2012. In the short-to-medium term, investment is largely required in the west of the Province. In the longer term we may need further interconnection with Great Britain, but we do not believe that that is an issue or concern at present. From the CBI's perspective, a key task is to ensure that the Planning Appeals Commission can undertake more than one public inquiry at a time. To have to wait two years for an inquiry into the North/South interconnector is totally unacceptable.

We foresee significant economic opportunities in the renewable energy sector. Many companies are already operating in that space, and there are significant research capabilities on the island of Ireland. Kirsty will mention that, as well as potential opportunities for partnerships with Scotland. We have received concerns about the cost of connections to the grid, not just from renewable energy projects. We welcome the fact that the Regulator intends to consult on that

matter in the near future.

The Committee is aware that access to credit for all types of business investment — including costs, conditions and processing time — is significantly more difficult now. We do not believe that funding for renewable energy is any worse; in many cases it is probably a little better, particularly in well-established technologies such as the wind sector. It is clear that costs will be higher now. It is important to have more clarity and certainty about Government policy and the nature of the support and the incentives that they can provide. More uncertainty leads to higher risks, which, in turn, creates more difficulties in accessing finance.

By way of providing additional evidence, the CBI has just completed a national policy document on energy from waste.

The report argues strongly that energy from waste will be vital in meeting our landfill, energy and climate change challenges. It is compatible with high levels of recycling and it is clean. It is economically viable on a wide scale. There are planning, financial and public procurement issues around that, and I am happy to provide the Committee with a copy of that.

Ms Kirsty McManus (IBEC-CBI Joint Business Council):

I thank the Chairperson and the Committee for the opportunity to give evidence. As Nigel said, energy has been a key focus of the Joint Business Council, which is a partnership between IBEC, representing the Republic of Ireland, and CBI Northern Ireland. I will outline briefly some of the work that we are doing on energy, but, more specifically, in the renewable industry.

In 2009, the Joint Business Council held its plenary in Edinburgh, facilitating the first tripartite energy forum for Northern Ireland, Ireland and Scotland. We brought together the three respective Ministers with the energy remit — Arlene Foster, Eamon Ryan and Jim Mather. On the day, 120 delegates from the energy sector and the wider business community attended, representing industry and government. One of the key outcomes from the summit was that the three regions should assess R&D capability in their respective universities' centres of excellence and work collectively on tripartite research projects; for example, renewables.

We are taking that agenda further. At the moment, we believe that the three regions have significant renewable energy resources. They share a common interest to optimise innovation,

research and development in renewable energy technologies. Renewables research is ongoing in each region's third-level research centres, and a number of tripartite research projects have been established, most notably the INTERREG-funded initiatives of the Isles project and BioMara. Therefore, the Joint Business Council has been working closely with the Energy Technology Partnership (ETP), which we also refer to in our written evidence to the Committee. We are exploring renewables opportunities with ETP in Scotland on a tripartite approach that links industry, academia and research.

As I said, ETP is an alliance of Scottish universities engaged in world-class energy research, development and demonstration. It involves 250 academics and 600 researchers and is an example of best practice for Northern Ireland. ETP has been successful in securing the services of 100 PhD students who will focus on renewable energy. ETP has also secured more than £300 million in funding from Europe and beyond. We are taking that agenda further by looking at opportunities for us to work more closely with the Joint Business Council and ETP on renewables to make Northern Ireland, Scotland and the Republic an area of renewable energy technology best practice in Europe.

That outlines the work that is going on in the Joint Business Council. Nigel and I are happy to take the Committee's questions.

The Deputy Chairperson:

Thanks for that presentation. The issue of ROCs versus feed-in tariffs has come up a lot in the debate. You seem to favour ROCs and I believe that you said that microgeneration was not feasible at the moment. The feed-in tariffs seem to be becoming more prevalent across Europe.

Mr Smyth:

I am happy to comment. In our submission, we highlighted that we found microgeneration to be very expensive in relation to other technologies, and somebody will have to pay for that if it is to be subsidised. We favour the ROC system, which has been modified and we accept those modifications, provided that ROCs is implemented sensibly, in a way that does not interfere with investment but provides stability to encourage investment. That approach is much more market-driven and one that, we believe, would deliver the most cost-effective renewables to achieve the targets.

The Committee will be aware that GB has introduced some significant incentives. A look at those must raise the question of their sustainability at the proposed levels and who will pay. There are arguments and there is tension between trying to stimulate the market and undermining competitiveness. If all customers have to pay, there will be a significant bill to be met by somebody else. Therefore, we prefer the ROCs because of the overall cost-effectiveness.

Mr Neeson:

Thanks for the presentation, and I could not agree more with Nigel about the impediments that Planning Service places in the way of developing the Northern Ireland economy. However, as regards renewables, to what extent is the Joint Business Council collaborating in developing the green new deal?

Mr Smyth:

Although the Joint Business Council has not been involved, the CBI has been actively involved in the green new deal, as has a range of stakeholders and social partners in Northern Ireland. On 2 November 2010, we will have a launch at Stormont.

As it features in the overall energy strategy, the most important and cost-effective action that people in Northern Ireland can take is to improve energy efficiency. If one looks at all of the graphs, one can see that the framework gets positive payback for money. The green new deal very much focuses on that. Certainly, we believe that it will provide economic, social and, indeed, environmental benefits. The challenge is to come up with innovative financing models. We hope that we will have done that, which will leverage significantly public sector money upfront with European investment loans and bank loans, and will also be paid in an innovative way through the pay-as-you-save scheme, which has also been tracked forward. We are working with one project manager. The Department of Energy and Climate Change DECC has 100 people working on it on a national level. We are very keen to see it happen and are enthusiastic about the opportunities it presents. There will be more news on that in the next few weeks.

Ms McManus:

From a Joint Business Council perspective, we have brought together large energy users and providers on an all-island basis. We are operating in a single electricity market. In August 2010, we brought them together to look at key issues on which we can work on an all-island basis. The Joint Business Council's role is to facilitate that, lobby on issues, support businesses that operate

in a single electricity market and support the competitive drive of that system.

Mr Cree:

I must say that you have provided a good paper. I enjoyed reading it. Two issues stand out for me. The first is the grid, which you mentioned. What would it cost to reinforce the grid, make it fit for purpose to take all of that additional energy feed? You also highlight, dare I say it, the plight of Government in their communication strategy with so many Departments being involved. You put forward the idea of a renewables champion. Can you flesh that out a bit more?

Mr Smyth:

We have not done any work on the grid and cost. However, the figure of £1 billion has been talked about, particularly in the energy strategy. I understand that work is under way at present. Indeed, I was a wee bit surprised. The regulator has just consulted on the start of his consultative review for next year. It indicates that it would be quite difficult to agree what the plan would be by January 2012. I know that the matter is complex. However, I hope that by January 2012 we will have a much better idea of what we need to do through the Systems Operator for Northern Ireland (SONI) or NIE. Indeed, as the Committee is aware, the energy strategy has indicated that the average cost per customer could be in the order of £45 to £80.

On the other hand, we must take into account energy prices globally; fossil fuel prices could well go up. Therefore, the price has to be considered in that regard. Also, there could be benefits from using wind on the single electricity market and the wholesale price could also be favourable. At times, it has come down. We expect it to come down again in the future, if energy is produced in that way.

We accept that there is a significant cost. We need to tie that cost down. We need to carry out planning. From our own engagement with NIE and others, we believe that a significant amount — perhaps, 60%, as we have suggested — could be achieved in a low-cost way using the existing high-voltage and low-voltage networks. However, to achieve the targets that have been set by the Government and agreed by the Executive will require significant investment. Most, if not all of that will be in the west of the Province. A significant cost comes with that. Figures that have been bandied around are in the order of £1 billion.

Ms McManus:

As regards an energy champion, feedback that we have received from members is that the current structure is a maze of bureaucracy. Five Departments are involved in energy: DARD; DETI on the energy policy side; DRD on transport, water and regional development; DOE on the Planning Service, waste and climate change; and OFMDFM on the sustainability policy. We believe that there needs to be a one-stop shop to make it as easy as possible for organisations to manoeuvre through the process. At present, they engage with five Departments depending on the industry to which they belong. Different processes are, perhaps, not strategically aligned. We advocate a one-stop shop for businesses, which could help to facilitate that process and ensure that the five Departments are singing from the same hymn sheet.

Mr Givan:

Thank you for your report. You touched on the North/South interconnector and the Planning Appeals Commission. Your report goes into the concerns about the planning process, and recommends that an infrastructure planning commission be established. Do you think that the current planning system does not contain the skill or capacity to deal with business timely? How will an infrastructure planning commission operate better than the current system?

Mr Smyth:

At least four public inquiries need to take place in Northern Ireland at the moment, and the inquiry on the North/South interconnector has been added to the bottom of the list. We have been told that that will take place in and around 2012. Our understanding is that the Planning Appeals Commission can run only one inquiry at a time. We think that that is totally insufficient. Two-hundred-and-seventy planners have just been redeployed. If it is a matter of the Planning Service providing an additional resource, it has got lots of commissioners with which to do so. If it needs an additional resource, it should make the decisions that are required to speed up that process. The current situation is unsatisfactory, and it will have an ongoing impact on not just the electricity grid but on some of the other inquiries on the back of that.

To be fair to the Planning Service, it set up a strategic unit some years ago, and there have been some improvements since then. However, the process is far from perfect. There is still a view that the Planning Service is very risk averse and does not like taking decisions. In addition, the process is fairly elongated. However, some very good progress has been made on projects such as the Titanic Quarter and others. Therefore, there are some signs that it can work.

Nevertheless, it seems that the service has a real problem dealing with contentious issues, and that that there are some failures in the process that make it unable to take those issues through. That is disappointing. We are just looking for an answer.

At the end of the day, the Planning Service may say that we cannot have whatever it is that we want, but the length of time that we have to wait for such a decision is unsatisfactory. Our understanding is that we will get a decision about the North/South interconnector in 2012 or 2013. It will then take three years to construct, so it will be 2016 before we get it. That will cost all the customers on the island of Ireland £20 million, and that is before we even look at the next stage. The issue is about whether we must go through the same process every time of looking at the health and environmental issues. Given that such a big investment is required, we need to look differently at the issue rather than simply repeating the same arguments.

Mr Givan:

Some business organisations have made representations to the Minister about having some kind of oversight body, made up of various different stakeholders, including those from the business community, to ensure that the planning system, planners and the Planning Service are held to account. As regards your recommendation for an infrastructure planning commission, is there a role for the type of oversight body that involves stakeholders from the business community?

Mr Smyth:

That is not something that we have suggested. Ultimately, it should be in the hands of the elected politicians who make those decisions. There are officials to go through that process. That is not something that the CBI has favoured or has come forward with. Kirsty, do you want to comment on the Planning Appeals Commission?

Ms McManus:

In our document, we reference the Northern Ireland Audit Office report on the Planning Service, which highlighted that it consistently failed to meet self-set targets. The Audit Office estimated that the cost of a planning application increased by 59% from 2004-05 to 2008-09. On top of that, it estimated that the number of decisions a planner made fell 19% between 2007 and 2009. Serious issues need to be addressed.

At the moment, we estimate that it will cost £1 billion to upgrade the grid. However, if there

are any delays in the process, it will cost substantially more. If one looks at the example of the North/South interconnector and the delays experienced with it, a figure such as £1 billion could easily turn into who knows what. Therefore, if the key issue of planning is not addressed, customers may have to pay more money at the end of the day.

Mr Givan:

As regards the capital spend and the amount of money that you said needs to go into the grid, can we realistically meet the target of 40% renewables without having the money there to invest?

Mr Smyth:

The encouraging thing about energy is that most of the investment will come from the private sector. From a recent briefing with ESB, the new owners, I understand that they are very keen. They have the money and are keen to invest. The problem is that they do not have the planning permissions to go ahead and invest. This is an area where the private sector will act. It must be done in a low-cost manner and there will be tendering processes and various things to achieve that. We are confident. The difficulty will be in getting through the rules and regulations. All of the uncertainty about this is unhelpful. As Kirsty said, the sooner we can come to some decisions on this matter, the better. Even with biomass and various other technologies, we are not going to meet the targets. Politically, or otherwise, we must try to facilitate the process of coming to agreement on this.

Mr McHugh:

You are both very welcome. I will ask about planning. In local areas, do planners have difficulty in moving from what they were doing before in order to face all this change? Is this a new area of work for them? Are they being upskilled? Can they envisage what we are trying to do? This is quite new. Many people in that group would rather wait for 10 years to see what might happen rather than get actively involved. I found that attitude in planning on a number of fronts, including archaeology, and I wondered whether you had found that to be the case.

There must be serious obstacles to be overcome in planning before we can do anything useful with respect to upgrading the grid. I am from the west, and I know the importance of the grid and the fact that we have not, even in very small areas, received micro-upgrades. Planning causes difficulties in all that. What resistance in planning are we facing? What do they come back to you with? Do they come back with anything?

Mr Smyth:

The Planning Service in Belfast has set up a sectoral specialism to deal with wind farms, as they have done in some other areas. That is welcome. It means that there are people with capabilities who understand the matter more fully. That was useful when PPS 18 came into play; before that, there had been a lot of confusion.

The member's second question was about the Planning Service's ability to implement agreed policies. However, the issue in the first place is about those policies. We now have a strong statement in the strategic energy framework, which says that a target is in place and that we need to act on it. That needs to be set within the policy framework, and then it will be a lot easier for the planners to follow it. The question is whether planning guidance is sufficiently strong for planners to say that they have received a strong acknowledgement and they need to support grid infrastructure. That will make it a lot easier for them to say that an application fits the criteria and take it through.

We will encounter the NIMBY aspect in all of this. People will not want to have transmission grids in their areas, and we will have to go through that process. As I said earlier, the health issue could well arise, and one would think that, once and for all, there is a lot of good evidence to the effect that transmission grids do not impact on health. However, rather than repeat this down the line, we need to try to overcome it or we will waste a lot of time, duplicate our efforts and delay the required investment. It will delay the arrival of jobs on the ground, the potential economic development that will come from this and the amount of money that goes into rural areas on the back of it. I do not think that it is a matter of capabilities, it is one of making sure that the policies are clear and supportive of what, strategically, the Executive has agreed needs to be done.

Mr McHugh:

Kirsty mentioned communications with the public on the issue. We have become aware of the subject matter in the Committee, because it is our work. However, it is not well known on the ground and the terminologies are not understood. The public needs more knowledge of this. People are interested, but there have been a lot of obstacles from community groups to wind energy and to various other things that were imposed on their areas and for which they saw no feedback in money or in any great return. There must be some feedback to communities, not just at Government level. You need to reach local people.

Ms McManus:

I agree. There must be engagement between business and communities and between Government and communities. That is the key issue, especially if we reach public inquiries.

In order to push those grid infrastructures through, especially in the west, where they will have the greatest impact, we will need to engage with the public and make them aware of the importance of the targets and the effect that they can have on the economy and on job creation. At the moment, there is a lot of misinformation, which is creating problems for potential investors, who are seeing delays.

Mr Smyth:

Companies that want to build infrastructure, whether it is grid capacity or wind farms, have a key responsibility to engage locally. Most good developers will try to do that. On the other hand, there will be local objectors. There are significant issues around misinformation, and one party, which is opposed to development in its back yard, will be against the other, which says that development is needed. That is where the role of government comes in. They need to point out where there has been a misrepresentation of the truth.

Mr Frew:

Thank you very much for your report. In it, you talk about Scotland as being a model of good practice. According to the graphs in the report, the Scots seem to be only a couple of years behind England, which, I suppose, is a tremendous feat. I tend to think that it all comes down to money. Whatever one's line of work, whether one is a customer or a big business, it all comes down to the return within a number of years. The judgement will be made on how many years it will take to make a return. In the years leading up to the present, householders, customers and business people have not necessarily received the right advice on how to proceed. Could you comment on where we are now?

Some of the bigger renewable energy companies that have come into Northern Ireland have not wrapped themselves in glory in how they have treated landowners and worked with them. There seems to be a competitive streak between the companies that have come here. In your report, you mentioned the £10 million prize fund for marine and tidal technologies in Scotland which is due to be given out in July 2017. How big a difference has that fund made to projects in

Scotland? Is it something that we should consider here, not only for tidal and wave energy but for all renewable energy sources? How can ordinary householders be incentivised to embrace renewable energy?

Ms McManus:

I will address some of the issues relating to Scotland. We talked briefly about ETP. From our experience of working with Scotland, we know that it has a stronger practical partnership between industry and academia. It also has a skills base derived from the oil and gas industries, comprising people who are skilled in science, technology, engineering and mathematics. We have a potential skills gap in Northern Ireland.

I have spoken with some businesses who have decided to engage in Scotland. The Saltire Prize is not their primary goal; they had to know whether the skills were there, as well as the infrastructure, the level of ROCs that were available and the payback period. The Saltire Prize will be awarded to one project; it would be nice to have, but I do not think that it was the primary motivator for those businesses. The ETP were very successful in securing 100 people with PhDs, who will focus on renewable energy sources. Cost is certainly an issue, but there are multi-functional levels of impact, and skills are important. Do our universities have the required capacity and the ability to attract and retain that kind of talent in Northern Ireland?

Energy efficiency must be a primary focus for ordinary householders. The incentive for householders must be to reduce their energy bills. That message needs to be driven forward, especially in Northern Ireland, with 50% of households in fuel poverty and with additional costs to energy bills because of grid infrastructure upgrades and delays. We need to ensure that those delays do not get worse over time.

Mr Frew:

There is also the fact that our housing stock is way below par on its energy rating.

Mr Smyth:

There is a lot of resistance from householders. I will put my hand up: I installed cavity wall insulation three years ago and I should have had it done 15 years ago. The payback period is probably three years. The house is a lot more comfortable now, and my wife does not complain so much. So, folks, get out there and do it. I am a great proponent of that.

In Northern Ireland, 70,000 properties could have cavity wall insulation but do not, so the resistance is massive. We hope that the green new deal will engage local stakeholders and make a difference. In some cases, there will be some up-front capital. We are looking at different financing models around that.

I was at the Joint Business Council event in Scotland, and what is interesting about the model there is that it brings all the universities together. Scotland is getting a lot of synergies. By working together, Scotland is accessing European funding. We have to try to replicate that model in Northern Ireland by linking with our colleagues in universities in the South and in Scotland. There is some exciting stuff in there. Very good, but extremely fragmented, research is going on in all our universities. We would love to make that happen, and we are working on a project, for which we will seek funding, to develop those synergies while involving businesses to optimise the value.

Mrs McGill:

On the great work that is being done in universities; you recommend that Northern Ireland should become a centre of excellence for renewable energies, which would marry academia and business. Is that realistic at this stage?

Secondly, Gerry and Nigel mentioned the situation in the west. I am from there. How will we engage with local communities to inform them, give them the right advice and raise the profile of renewable energy? I sit on Strabane District Council, which receives planning applications for individual wind turbines on farms. There are difficulties in how people and planners deal with such applications. Do you see a specific role for local government in that process and on that of creating the centre of excellence?

Ms McManus:

As regards the centre of excellence, we will get to that point eventually. Projects that we advocate, such as tripartite industry/academia partnerships, will be precursors to the centre of excellence. We feel that we could easily engage more with the framework programme under EU funding. If Scotland, Northern Ireland and the Republic engage, we will have two member states involved. We are not yet at that point, but, with time, when we build up the skills base, we will have a case for applying for European funding. Framework 7 is very competitive. If we can

come together and learn from examples such as Scotland's, we will get to the point of being a centre of excellence. We have the resources, it just a matter of leveraging.

Mr Smyth:

When it comes to individual wind farms, we have some of the best wind assets in Europe and we should be trying to take advantage of that. Other countries do not have that. Wind is very cost-effective, and we need to maximise its use. Leadership is required at all levels, from the Executive down to local councils. We need good quality information. We need to highlight the challenges and risks associated with fossil fuel prices.

A few years ago, we saw what happened when the oil price rose. It is more likely to rise in the years ahead rather than come down, and we must plan for that. We need to change our culture and recognise the value of wind power. Many other countries have successfully exploited wind energy, but we need to change people's perceptions. Everybody has a role to play in that.

Mrs McGill:

Do the witnesses have a view on individual wind turbines? I understand that they make no significant contribution to the grid. Is that the case?

Mr Smyth:

Many years ago, we had B&Q putting turbines in windmills, and then I heard that it cost more carbon to create those than would ever be saved in a lifetime. There is a certain size at which an individual windmill, or whatever we want to call it, starts to make economic sense. Wind turbines on isolated farms are probably getting to that level. However, to achieve an economic advantage, a reasonably-sized windmill of a certain capacity is needed. I am sorry that I cannot provide the technical terms. Noise implications are unlikely, but a windmill of that size would certainly have visual implications locally. We are just going to have to start getting used to that.

Mrs McGill:

Thanks.

The Deputy Chairperson:

I thank Nigel and Kirsty for the presentation. The Committee will note it in its inquiry report. Are you happy to respond in writing to any unanswered questions?

Ms McManus:

Yes; absolutely. Thank you very much.