Contribution by the European Sea Ports Organisation to the public consultation on an EU Strategy for Offshore Renewable Energy

25 September 2020

ESPO welcomes the opportunity to contribute to the consultation on an EU offshore renewable energy strategy and the development of an EU strategy charting the path for offshore renewable energy.

European ports look forward to the opportunities - both in terms of business and sustainability - offered by European strategic support for offshore renewable energy. However, ESPO believes that it is important that the development of the offshore renewable energy sector is done in a sustainable, fair and responsible way. It should not impact other sectors of critical importance to Europe's green economy, in particular maritime transport and seaport activities. As such, ESPO underlines the importance of Maritime Spatial Planning to guarantee the safety and continued functioning of maritime transport by respecting maritime access corridors and anchorage areas.

Similarly, as Europe's ports are unique intersections between land and sea, they are unique onshore landing points for offshore renewable energy infrastructure, meaning they have a crucial role in the production, storage and recycling of these technologies. Offshore renewable energy can also play an important role in decarbonising the port, transport activities and industries within the port cluster. Final aspects for the strategy to consider include addressing global competitivity and ensuring a level-playing field between member states.

In detail, ESPO believes that the strategy for offshore renewable energy should consider the following points[1]:

Seaports must be recognised as unique onshore landing points for offshore renewable energy

Ports exist at the intersection between land and sea, meaning that they play a unique role as onshore landing-point for the offshore renewable sector. Ports provide both the space and facilities for the production of parts, construction, maintenance and decommissioning of offshore renewable energy infrastructure. The necessary ramp up of offshore technologies will also imply larger turbines, and consequently more port space, as the ramp up gathers pace, while dedicated servicing boats will have to moor in ports. Similarly, **renewable offshore energy flows will have to be converted and stored**, for example in the form of hydrogen or synthetic kerosene, in ports. **All of this will require a significant**

[1] Offshore wind energy is currently the most relevant sector for ports when considering offshore renewables. This paper thus focuses on issues surrounding that sector. However, ESPO's position also holds for emerging offshore renewable sectors such as tidal and wave energy.

amount of space and investment in the port area. The strategy should take this into account and provide relevant planning and financing measures accordingly.

The Commission should also further consider the role of ports in **decommissioning of offshore energy infrastructure and the circular economy**. As well as end-of-life treatment of offshore facilities, the strategy should also consider the operation and maintenance of the existing cumulative fleet, including aspects such as digitalisation, life-time extension and repowering of projects. These elements all have direct impact on port services and should therefore be made clear in the strategy to ensure ports can plan their business strategies effectively.

It is also important to note the diverse roles of ports in offshore renewable energy. While most European ports are landlord ports, European port managing bodies take up different roles and responsibilities ranging from facilitators, co-investors to bodies that have a critical role in the production, conversion and distribution of energy or hubs of innovation, knowledge and training for the offshore sector.

Ports as users of offshore renewable energy

Ports themselves need vast amounts of electricity produced from renewable energy (as well as hydrogen and other renewable energy carriers) to achieve **decarbonisation targets of all actors in the port area.** The strategy should therefore emphasise the added value of coupling the renewable energy sector with the port cluster. Timely realisation of adequate infrastructure (both above and below ground) will be the key, especially when it comes to ensuring adequate capacity of the electricity network and the role of interconnectors. Indeed, **the role of interconnectors as strategic sector coupling solutions,** together with renewable hydrogen, storage and other flexibility solutions should be further developed in the strategy, alongside the space and investment needs to develop these areas.

In certain geographical areas that have the potential for abundant energy capacity from renewables, there may be the opportunity to couple the offshore renewable energy with **Onshore Power Supply (OPS)** facilities in ports. In cases where this makes business sense, this should be encouraged.

Ensuring a sustainable and responsible roll-out of offshore renewable technology in respect of maritime and seaport activities is a priority for ESPO

The **economic value of our oceans is growing.** We increasingly depend on them for our food, energy, raw materials and tourism. In order to be able to combine shipping, fishing, exploitation of gas fields, planning and expanding offshore facilities as well as multi-use purposes in and around offshore facilities, while preserving maritime ecosystems, **advanced Maritime Spatial Planning** will be necessary.

The roll-out and scaling up of offshore renewable energy should take into account the critical role of maritime transport and Europe's ports. About 75% of Europe's trade with the rest of the world - and more than one third of intra-European trade - is shipped through its seaports. European ports are at the crossroads of multiple supply chains and blue economy sectors. To be able to carry out all their roles, Europe's maritime transport and ports sector must be able to count on safe maritime access lanes and corridors as well as anchorage areas for shipping. Safety is an issue in this regard: the closer windfarms and other activities get to maritime access lines, the more likely the chance of calamities becomes.

The offshore renewable energy strategy must also look at the issue of seabed cables. Windfarms need connection to grids, but the cables can present a problem, given the important amount of space needed by the multiple cables that have a cumulative width of anything between 20 and 50 metres. This is in particular the case when seabed cables are situated under the access lanes to and from ports.

An early consultation process with the port managing bodies and relevant stakeholders must ensure a careful planning of seabed cables **which also takes into account future needs in terms of port access, anchorage and potential fairway deepening.**

ESPO hopes that the submission of all Member States' maritime spatial plans in 2021 should contribute to a **speed-up in the application process for offshore development**. This includes timely identification and reserving very scarce physical and environmental space, identifying and attracting the investments needed for infrastructure and advocating for an adequate regulatory framework on different levels to be able to speed up the rolling out of offshore wind farms. A push from the European level towards national, regional and local authorities to ensure timely action through the reservation of space and funds, would be welcomed.

Finally, to account for the increasing space constraints in European waters, ESPO emphasises that **increased bilateral and multilateral MSP cooperation between Member States should be prioritised,** ideally through a European sea basin approach**.** This will ensure the efficient allocation of marine space.

Maintain European support for offshore renewable energy

ESPO welcomes European support, through financing and targets for the offshore renewable industry. In general, European managing bodies support **ambitious R&I for offshore renewable energy and the related port infrastructure, with backing from EU financial tools**. Similarly, in the criteria for European funding instruments, the long-term benefits of offshore wind, including in climate change mitigation, should be factored in to relevant cost-benefit assessments and decisions. Finally, in order to create the right conditions for developers and investors to start the scale-up as soon as possible, the Commission should ask regional regulatory authorities (ACER, national maritime authorities, TSOs...) to commit to the execution of **offshore targets**.

Competition in Europe and the world

All efforts should be made to encourage competition in the offshore renewable energy markets to ensure the highest quality. This must start at EU level, by ensuring that relevant regulations, for example state aid rules, **ensure a level-playing field between Member States**. As part of this push, ESPO believes that the development of the Trans-European Transport Network should be **closely coordinated with the European energy and telecommunication networks** to enable and maximise synergies between the sectors and ensure cooperation and fair competition between Member States.

Further afield, **the strategy should ensure provisions for a level playing field with the UK**, once its exit from the EU is complete. Ideally, strong cooperation in the offshore sector would continue, while at least the strategy should ensure competition remains fair.

Finally, the strategy should include a clearer focus on a **global competitiveness**. Given Europe's leadership in the sector, efforts should be made to capitalise on its export potential, both in terms of products and of knowledge-transfer. Ports can play a role in this as knowledge-centres and hubs of blue growth.

The European Sea Ports Organisation (ESPO) represents the port authorities, port associations and port administrations of the seaports of 22 Member States of the European Union and Norway at political level. ESPO has also observer members in Iceland, Israel, Ukraine and the United Kingdom. ESPO is the principal interface between the European seaport authorities and the European institutions. In addition to representing the interests of European ports, ESPO is a knowledge network which brings together professionals from the port sector and national port organisations. ESPO was created in 1993.