



## **Contribution of the European Sea Ports Organisation (ESPO)**

### **to the Call for evidence on guidance on designating renewables acceleration areas**

**February 2024**

The European Sea Ports Organisation welcomes the opportunity to contribute to the call for evidence on guidance on designating renewables acceleration areas which will be provided by the Commission as part of the revised Renewable Energy Directive.

Overall, Europe's seaports welcome the recently revised Renewable Energy Directive 2023/2413. Progressing fast on the energy transition is a must and the deployment of renewable energy is crucial to make Europe less energy dependent from third countries and to increase Europe's security of supply by increasing domestic renewable energy sources production. We would like to stress the need for a harmonised implementation of the Renewable Energy Directive and its delegated acts across the different Member States to safeguard a level playing field and transparent investment climate.

Being at the crossroads of supply chains as well as being hubs on energy and blue economy, ports are instrumental in making the energy transition happen. Many projects are developing; however, recent economic factors and geopolitical developments are increasing the pressure on existing projects in terms of economic viability (both CAPEX and OPEX) and in some cases resulting in delays or even cancellations. Facilitating the permitting process for renewable energy projects will be essential to allow ports to play their role.

#### **1. The definition of renewable acceleration areas requires a functional approach on top of the geographical approach**

ESPO welcomes Article 15c of the Directive regarding the designation of renewable acceleration areas. Designating a single specific location in the port as area for renewable energy production, storage and connection to the grid will however be difficult. It is not always possible nor efficient to concentrate the plants for the production of renewable energy, energy storage facilities as well as assets necessary for their connection to the grid, in one specific location. In certain cases, such infrastructure can be both on the land and on the seaside.

Europe's seaports therefore stress the need to combine the geographical definition with the functional approach.

## 2. Other activities should remain possible in acceleration areas

When identifying areas that are needed for the installation of plants for the production of renewable energy as put forward in Article 15b and when designating renewable acceleration areas in accordance with Article 15c, Member States should not exclude other activities in this area.

Renewable energy production and deployment require a lot of space. Given the scarcity of space on land and at sea, different uses of a certain area have to be combined efficiently. When identifying the renewable land and sea areas and prioritising acceleration areas, Member States should not exclude other activities in this area. A dedicated area exclusively for renewable energy projects in ports is not always feasible nor efficient. In addition, ESPO stresses the need for Member States to work together and encourage cross-border cooperation, both to minimise the spatial impact as well as to ensure the most efficient solutions which in some cases can even result in lower investments costs.

## 3. Hydrogen infrastructure is essential to achieve the REPowerEU objectives

To be consistent with the goal put forward in the REPowerEU plan of ensuring Europe's security of supply, to which accelerating both the production and import of renewable hydrogen is a must, ESPO believes that hydrogen production facilities (e.g., electrolyzers) together with infrastructures for the transport and storage of hydrogen should be considered to be in line with the 'Do no significant harm' principle. In addition, the objective to fast-track permitting should be translated into practice.



*The European Sea Ports Organisation (ESPO) represents the port authorities, port associations and port administrations of the seaports of 21 Member States of the European Union and Norway at political level. ESPO also has observer members in Albania, Iceland, Israel, Montenegro, 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.*