



Position of the European Sea Ports Organisation

on the Commission proposal for a Directive amending the Renewable Energy Directive, the Energy Performance of Buildings Directive and the Energy Efficiency Directive

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As part of the REPowerEU strategy, the Commission published on 18 May a proposal for a Directive amending the current Directives on Renewable Energy (RED), on Energy Performance of Buildings (EPBD) and on Energy Efficiency (EED) (COM(2022) 222 final).

With this position paper, the European Sea Ports Organisation (ESPO) would like to comment more in particular on the provisions referring to the review of the RED, more specifically the amendments to Directive 2018/2001.

1. ESPO welcomes the objective of the Commission proposal

Overall, Europe's seaports very much welcome the new proposals to review Directive 2018/2001. Progressing fast on the energy transition is a must. The European Sea Ports Organisation fully supports the European Green Deal ambition and the 2030 and 2050 goals enshrined in the EU Climate Law. The deployment of renewable energy is crucial to make Europe less energy dependent from Russia. **Europe's ports welcome in that context the new target of 45% of renewables in the gross final energy consumption of the EU by 2030.**

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. Facilitating the permitting process for renewable energy projects will be essential to allow ports to play their role. The Commission proposal is an important step in recognising the importance of the problem and defining a way forward.

In June 2022, the European Sea Ports Organisation published a report made by Royal Haskoning DHV on "The new energy landscape: Impact on and implications for European ports".

The study explains that "the use of land and port space spatial requirements is changing in the new energy landscape. The scarcity of space, securing suitable land, and making the right trade-offs will remain a challenge for ports. Spatial planning of the port will increase in complexity due to the

integration of future energy plans, infrastructure, and requirements (e.g., ecology). Zoning requirements and minimum distance from urban settlements to energy handling storage and transport have to be balanced in a new way when for example looking into city ports. Also, permitting for projects in some countries take up more than ten years and port authorities currently face issues with consistency of and public policies related to renewable energy deployment, reallocation of industries, environmental policies, and biodiversity preservation”.

<https://www.espo.be/media/The%20new%20energy%20landscape.pdf>

2. The definition of go-to areas requires a functional approach on top of the geographical approach

ESPO very much welcomes the idea of designating renewable go-to areas as foreseen in Article 15c of the proposal. 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. The legislation should also consider production away from ports (e.g., sea) in the designated renewable go-to (acceleration) areas.

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

3. Other activities should remain possible in go-to 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 go-to 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. The abovementioned Royal Haskoning DHV study reveals, amongst other, that “renewable energy and new energy carriers require more, large, and safe storage spaces to accommodate supply-demand variation and new industrial processes. Compared to diesel, fuels such as LNG, ammonia and hydrogen take up respectively two, three and four times more space for storage”.

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 go-to 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.

It should also be clear that the permitting ease as described in Article 16 should only relate to the renewable energy projects falling under this Directive and not to the other activities in the same area.

4. Hydrogen infrastructure is essential to achieve the REPowerEU objectives

To be consistent with the goal put forward in the REPowerEU plan of making Europe independent from Russian fossil fuels, 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.



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 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.