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Combating climate change with offshore renewable energy

CAN Europe position on the EU offshore renewable energy strategy

Submission by CAN Europe, August 2020

CAN Europe welcomes the preparation of the EU offshore renewable energy strategy. To ensure we reach net zero emissions by 2040, EU Member States need to phase out fossil fuels and commit to a strong reduction in energy consumption and a transition of our energy system to one that is 100% based on renewable energy sources (RES) by 2040. The current 2030 EU RES target is not in line with the Paris Agreement objective to limit temperature rise to 1.5°C. In the coming decade and beyond, EU Member States need to significantly increase the deployment of renewable energy.

Offshore renewable energy will be a key technology part of the future energy transition. To support the needed multiplication of offshore renewable energy capacities, the EU and its Member States need to improve planning, increase regional collaboration and significantly improve the regulatory framework to ensure sufficient offshore renewable energy is deployed fitting with a scenario in line with the 1.5°C target. However, while doing so, the deployment should be handled with respect for marine ecosystems. It is imperative that climate, energy and marine biodiversity policy are reinforcing each other.

- Climate change hits our ocean and seas strongly. The rising concentration of greenhouse gas emissions is having a double impact on our ocean and seas: it is driving up water temperatures and causing acidification, which interact to the detriment of marine ecosystems. The ocean's climate regulation power is also affected, as its capacity to trap heat and excess of carbon decreases. In turn, all of these climate-driven shifts negatively affect the ecosystem services provided by our seas to humankind, including food security and stable living conditions. To gain resilience to the climate and biodiversity crisis, these ecosystems have to be restored, protected and maintained. Healthy marine ecosystems can also play a major role in reducing the effects of the climate crisis (IPBES, 2019), but ultimately their survival will depend on reducing climate impact for which we need to urgently replace fossil fuels by a.o. offshore based renewables.
- Offshore renewable energy deployment is a key component for reaching the Paris Agreement's climate target. Moving towards climate neutrality by 2040, also means phasing out of fossil fuels before that date. As at least 80% of discovered fossil fuels need to stay in the ground, the EU should immediately put to an end subsidizing all fossil fuels, stop approving new drilling permits

both for exploration and exploitation of oil and gas and adopt an offshore drilling ban in EU waters.

- When elaborating the strategy, one should consider that our seas and ocean are already heavily altered by offshore oil and gas exploitation, overfishing, habitat destruction relating to extractive activities and dredging and marine and land-based pollutants, such as shipping discharge and wastewaters, agricultural runoff and plastics which result in a poor environmental and ecological status. The EU regulatory framework should ensure that actions are taken to prevent, minimize and monitor the additional environmental impacts of new offshore infrastructures such as wind farms, related grid infrastructure and power hubs. The negative impact of offshore infrastructure and related grids need to decrease. To protect marine ecosystems, RES should therefore not be placed in the ecologically most valuable areas for sensitive species and habitats and/or providing climate refugia. A further development of offshore renewable energy and associated grid infrastructure should also be based on ecosystem-based marine spatial planning integrating cumulative human impacts across sectors and favor best-proven technologies, while being complemented by broad-scale research informing on the effects of these new technologies on ecosystems. All in all, RES deployment should be complemented with commitments to better protect marine ecosystems against all forms of pollution through the Marine Strategy Framework Directive, the EU Nature Directives and the Maritime Spatial Planning Directive. They should also be consistently articulated with marine and coastal spatial protection targets, and should adopt the net-gain principle as put forward in the latest European Biodiversity Strategy.
- With a clear framework and careful planning, an increase of offshore renewable energy can be achieved, while ensuring the preservation, protection and maintenance of a favourable status of our ocean. To achieve a sustainable development, offshore renewable energy often needs to be preceded and accompanied by targeted species and habitat protection and restoration programmes carried out or coordinated by national or regional governments. In some cases this may be funded directly or indirectly by project proponents.
- A supportive policy framework for the planning of new renewable energy infrastructure can be an opportunity to reduce the effects of other anthropogenic activities in the marine environment. The strategy needs to show how offshore renewable capacities can be expanded without being unnecessarily hindered by restrictions imposed by the military. As mentioned in the EU Biodiversity Strategy the “EU will prioritise solutions such as ocean energy, offshore wind, which also allows for fish stock generation”. Therefore replacing destructive marine activities, such as benthic fishing practices, should be considered.
- When laying out a supportive policy framework for the roll out of offshore wind energy, the EU offshore renewable energy strategy shall recognise two different time perspectives, respectively pre-2030 and post-2030. While offshore wind projects up to 2030 are already in the pipeline, it is imperative that EU and Member States improve planning and foresee a supportive regulatory framework within a very short timeframe. For the post-2030 perspective, due to new technologies and developments, different planning and policy approaches will be needed. The EU offshore renewable energy strategy should also anticipate that offshore wind project developers will start the planning of this post-2030 period very soon.
- Regional cooperation should become the guiding principle for planning and development of offshore RES. This regional cooperation should work towards
 - joint and cross-Member States planning (including through ecosystem-based Marine Spatial Planning) for offshore RES and related grid infrastructure,
 - common frameworks for assessing and monitoring environmental impacts,

- acting on regulatory barriers that current and innovative projects (e.g. hybrid¹) face with regards to legal requirements, planning procedures and energy market rules.

Part of this work could be undertaken by the infrastructure high level groups. However, these groups should become more transparent and allow for public engagement.

- The European Commission shall support the Member States through an enabling framework and the enhanced use of Union funds for integrating renewable energy from offshore RES into the energy system, for increasing flexibility of the energy system and for enhancing regional cooperation between Member States.
- Member States have foreseen around 100 GW of installed capacity of offshore wind energy in their NECPs up to 2030. Not only do we need to achieve a sufficient role out in the long term, it is problematic that the plans fall short of the supportive policy measures. The upcoming EU offshore renewable energy strategy needs to lay out how the national policy frameworks for offshore RES need to be improved, keeping in mind that planning and deployment of offshore RES needs to be coordinated at regional level.
- Member States should recognize the added value of cross border development of offshore wind power because they increase domestic renewable energy capacity and lead to lower costs. While recognizing some of the challenges linked to joint support schemes, Member States could consider joint tendering and joint support schemes. The European Commission should provide guidance to this process, while ensuring that all Member States involved enjoy clear benefits in the form of employment, technical development or income.
- The upcoming strategy should lay out how landlocked Member States without direct access to a shore, can also benefit and support offshore RES projects.
- For a successful deployment of offshore renewable energy installations, a long-term and integrated offshore grid masterplan, will be needed. This plan needs to reflect how an efficiently planned and managed electricity grid can support the ambitious deployment of offshore RES, while at the same time, prevent and minimize the impact on the marine ecosystems.
- The revision of the Trans-European Networks for Energy (TEN-E) Regulation should allow it to build the backbone of a successful energy transition in line with the Paris Agreement. The TEN-E Regulation must support the European Green Deal. Energy infrastructure should neither become a bottleneck to the uptake of renewable energy nor should it deepen the EU's dependency on fossil fuels.
- The TEN-E Regulation attributes the Project of Common Interest (PCI) label to cross-border infrastructure that is deemed a priority. Permitting procedures granted to PCIs still remain complex and lengthy. Instead of fossil fuel projects, the PCI status should be granted to projects that speed up the deployment and grid integration of offshore renewable energy. It remains however important that all the PCI projects are also assessed in line with the Nature Directives, the Strategic Environmental Assessment and Environmental Impact Assessment Directives. Attribution of priority status should be carefully examined for projects which might impact on sites or species which are protected for their nature or biodiversity value.
- Member States have to continue to work on the acceptance of renewable energy including market access for new actors like energy communities. In line with the Clean Energy Package, the role of energy communities in offshore renewable energy projects needs to be recognized and actively supported. When elaborating an enabling framework, Member States shall also consider how to promote and facilitate the development of renewable energy communities in offshore renewable energy projects.

¹ Hybrid offshore projects are platforms that link offshore wind energy generation and electricity transmission infrastructure of more than one country. They pave the way towards a future integrated energy system in our seas, offer cost savings and increase the utilization of the infrastructure

- The ambitious deployment of offshore renewable energy should be part of an overall strategy to reach 100 % RES by 2040. Ambitious targets for offshore renewable energy deployment shall not replace but shall complement the deployment of other renewable energy sources such as onshore wind and solar.
- The European Union has to ensure the creation of a robust circular economy framework for the design of offshore renewable energy that does not only look at building infrastructure, but already designs for the requirements of decommissioning. In order to strengthen qualitative recycling, the European Union is recommended to use specific targets, ideally material-specific targets to overcome issues of specific waste streams. In the light of developing new technologies, it needs to be always checked whether the dismantling of wind turbines is inherently necessary and whether repowering while reusing components, poses a more environmental sound option, according to EU-Waste hierarchy, with a focus on waste prevention.
- Offshore wind turbines require only a limited amount of rare earths. Implementing the circular economy approach in turbine design along with higher reuse and recycling rates prevents potential future supply shortages. By doing so, potential future incentives for unsustainable mining also could be prevented.