RGI Response to the Offshore Renewable Energy Strategy

Developments in offshore renewables (ORE) will play a key role in realising a climate neutral economy and succeeding in the renewable electrification process. The planning of offshore energy expansion should entail an energy system approach which considers technological innovation, sector needs, optimisation opportunities and nature protection. Collaboration across borders, sectors, technologies and stakeholder groups is needed to facilitate the development of innovative and sustainable solutions from the planning stage onwards.

To support this, the Renewables Grid Initiative (RGI) is coordinating a multi-stakeholder coalition consisting of wind developers, transmission system operators (TSOs), NGOs and other industry actors, with the objective of developing an ecosystem-based approach. This should, in turn, be used in offshore wind energy and grid planning, contribute to Marine Spatial Planning (MSP) and deliver solutions. Based on our specific knowledge and experience, RGI recommends the European Commission (EC) to consider the following elements in the Offshore Renewable Energy Strategy.

Ensure coherence and consistency

The EU Offshore Renewable Energy Strategy should provide a transparent, coherent and clear overall framework for action in the field of ORE, setting standards that enable cross-border cooperation and implementation. It needs to be consistent, not only with EU energy and climate objectives and Green Deal measures such as those foreseen in the Industrial and Energy System Integration Strategy, but also with nature protection objectives and legislation such as the EU Biodiversity Strategy and the Birds & Habitats Directive.

Additionally, in relation to the upcoming revisions of European legislative acts with an impact on ORE development, RGI recommends that:

- the revised TEN-E regulation should be designed to fully recognise the potential and positive externalities of offshore hybrid and multinational infrastructure. It should clarify and, where possible, remove the barriers currently present for hybrid projects including to access Project of Common interest (PCI) status and Connecting Europe Facility (CEF) funding, and create the framework to enable the inclusion of sustainable technological solutions that may become available in the future.

- It is necessary to (re)assess the market design for a RES-based system, including with regards to the 70 % requirements for cross border trade, considering that the European electricity system will have a dominant share of variable RES (Renewable Energy Sources) by 2030 and beyond. Moreover, RES targets are expected to be further raised in the upcoming review of the Renewable Energy Directive (2018/2001/EU) in line with a more ambitious EU 2030 GHG target and the objectives of the Paris Agreement.

Renewables Grid Initiative e.V.
Manfred-von-Richthofen Straße 4, 12101 Berlin
Tel: +49 30 7677 1945-0
info@renewables-grid.eu

Plan with an energy system approach

In line with the EU Energy System Integration Strategy, coordinated planning and operation of the energy system 'as a whole', across multiple energy carriers, infrastructures, and consumption sectors is needed in order to deliver a climate neutral economy. The announced transition to large-scale electrification requires sustainable energy, with a clear role for ORE as well as other technologies to be deployed on-land. It is increasingly important to set up processes to foster, stimulate and reward coordination among supply and demand, flexibility actors and grid infrastructure developers. Developing and implementing a joint agenda linking the development of ORE to the electrification of the industry sector is essential including to identify and sustain investments in non-electric solutions. This would also provide clarity on the transport capacity needs, enabling grid operators to deliver a cost-efficient and timely grid infrastructure. Essential to this is also an integrated system planning which consider the entire time frame required for reaching climate neutrality.

Plan with an ecosystem approach

Today, spatial planning is generally carried out at national scale or, in some cases, at project level. This is no longer sufficient. Planning at the ecosystem scale instead, can deliver large benefits: nature can be protected, maintained and restored, and most vulnerable areas excluded from human activities. Deployment of ORE should be positioned where they will deliver the best output and the least damage. Similarly, compensatory measures as a last step in the mitigation hierarchy can happen at the level of the ecosystem, where they can have greatest impacts. This necessarily means planning across borders for the entire sea basin.

The ecosystem approach will allow the industry certainty on where infrastructure can be placed, and thus reduce the risks of delays and court cases. Essential to this approach is the full assessment of environmental impacts and cumulative impacts of offshore energy infrastructure and other human activities. The development of comprehensive wildlife sensitivity mapping becomes a building block even before undergoing Maritime Spatial Planning and would contribute to identifying areas of high importance for species and habitats as well as uncertainties due to knowledge gaps. To fill knowledge gaps as soon as possible, dedicated funds allocated, and results made openly available and shared among all users at European and national level.

The strict environmental criteria based on ecosystems protection should be applied to all offshore human activities so that one activity does not jeopardise the existence of another.

Deliver technological harmonisation

Technologies that enable the concentration of infrastructure such as meshed grids and interconnectors as well as standardising technical requirements must be strengthened by a cross-border policy framework. EC regulation must create an environment that rewards optimisation to allow for efficient and sustainable integration of ORE by TSOs and regulators. Through this, costs for consumers – as

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Manfred-von-Richthofen Straße 4, 12101 Berlin
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info@renewables-grid.eu

well as nature impacts and use of materials - can be reduced and more certainty for investors/developers can be ensured.

Ensure circularity

ORE related activities have the potential of creating long-term benefits for the European economy, including the opportunity to strengthen European leadership in the entire supply chain and to realise a clean energy future.

Offshore infrastructure needs to be assessed in its entire lifecycle with sustainable management of assets' end-of-life and supply chains. EU investment in implementing circular economy principles in line with the EU waste hierarchy, in decommissioning and recycling possibilities can help kick-start this.

Foster collaborations and participation

The development of ORE is only possible if planned collaboratively, across sectors and with meaningful participation from all stakeholders, including industry, NGOs, energy modellers, governments and permitting authorities and academia. Pilot projects should be more interdisciplinary, combining for instance wind with grids and landing points to investigate innovative solutions.

Stakeholder engagement processes for offshore activities should be mandatory and similar in scope of those for onshore projects. Meaningful engagement processes must start early, provide possibilities to influence decisions, and make information and data publicly available and without cost in order to reduce delays at a later stage. Any offshore engagement process should also bring clarity on landing points and impacts on coastal areas from both a societal and an economical point of view.

This document represents the constructive work conducted by RGI Members, by TSOs and NGOs, to identify the common themes and actions needed for offshore renewable developments in Europe. RGI Members may also submit their individual positions.

About RGI

The Renewables Grid Initiative is a unique collaboration of NGOs and TSOs from across Europe engaging in an 'energy transition ecosystem-of-actors'. We promote fair, transparent, sustainable grid development to enable the growth of renewables to achieve full decarbonisation in line with the Paris Agreement. RGI members originate from a variety of European countries, consisting of TSOs from Belgium (Elia), Croatia (HOPS), France (RTE), Germany (50Hertz, Amprion, TenneT and TransnetBW), Ireland (EirGrid), Italy (Terna), the Netherlands (TenneT), Spain (Red Eléctrica de España) and Switzerland (Swissgrid); and the NGOs BirdLife Europe, Climate Action Network (CAN) Europe, Friends of the Earth Ireland, Fundación Renovables, Germanwatch, Legambiente, NABU, Natuur&Milieu, the Royal Society for the Protection of Birds (RSPB), Transport & Environment (T&E), WWF International and ZERO. RGI was launched in July 2009.

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