

European

MARINE BOARD

Advancing Seas & Ocean Science

Feedback from the European Marine Board Secretariat to the European Commission's consultation and call for evidence on Commission Recommendations and guidance on design elements of renewable energy auctions

(13 February 2024)

The European Marine Board (www.marineboard.eu) is pleased to see that the Commission is considering including criteria such as sustainability, environment and sea basin protection in its recommendations and guidance for the design of renewable energy auctions. The recommendations made below are based on the findings presented in the EMB publication on European offshore renewable energy: Towards a sustainable future (<https://www.marineboard.eu/publications/european-offshore-renewable-energy-towards-sustainable-future>).

There are many potential and already observed (positive and negative) impacts of offshore renewable energy on the environment and its inhabitants. However, these vary depending on the location and nature of the installation, therefore we caution that a "one-size-fits-all" criteria on environmental impact will not be appropriate. Instead, a risk-based approach is recommended. The approach for considering environmental impact should also be flexible and adaptable as new scientific understanding on offshore renewable energy impacts alone and in combination with other marine stressors emerges.

In terms of sustainability, criteria that consider the full lifecycle impact of the proposed development and take a circular economy approach are recommended. This means that not only the direct sustainability of the structures and materials themselves should be considered, but also the full supply chain including e.g. where goods and materials come from and how they are being transported, designed for decommissioning and recycling etc.

At present, it is not clear whether the guidance will also include criteria for considering the impact on local coastal communities, who are often impacted by these developments but rarely gain benefits from them. The impacts of the development during all phases from exploration and construction through to

operation and decommissioning should be considered, and local communities should be engaged throughout to ensure suitable trade-offs are agreed.

It is stated in the guidance that innovation, sustainability and reduced environmental footprint should be rewarded. Therefore, criteria which consider the potential multi-use of the proposed development area should be included. There is high demand for marine space thus efficient and complementary multi-use should be considered wherever possible.

Finally, it is stated that the guidance should require compliance with cyber security and international data transfer in line with EU law and international obligations, however it is not clear what exactly this would entail. In line with Open Science and FAIR data principles, criteria that encourage the inclusion of non-sensitive environmental / resources / social data in EU repositories such as EMODnet (<https://emodnet.ec.europa.eu/en>) should be strongly encouraged.