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National Policy for the Deployment of Offshore Renewable Energy Public Consultation response Friends of the Earth Malta

With this document, Friends of the Earth Malta would like to submit their comments on the [draft National Policy for the Deployment of Offshore Renewable Energy](#).

Increased targets and climate neutrality

To start, we are happy to see the government committing to accelerated ambitions for the transition to renewable energy sources (RES) and the ambition for the country to be climate neutral in 2050. Malta has one of the lowest RES shares in the EU, so there is a strong need to ramp up efforts, to reduce fossil fuel dependence and increase energy security. How will this increased ambition be translated into new targets for 2030, 2040 and 2050 in the Low Carbon Development Strategy (LCDS) and the National Energy and Climate Plan (NECP) that is currently being updated? How does the government define climate neutrality, and how will that goal be reached, considering the LCDS target for RES is just 21% of the total energy demand in 2050? Later on in the policy document (point 1.13), it says the policy is fully aligned with the LCDS and NECP. How does this translate to increased ambition?

Community energy and citizen participation in offshore RES

On the 4th of September 2023, Friends of the Earth Malta together with the Malta Cooperative Federation, organized an information session for government representatives and held a meeting with Minister Dalli, her energy advisor and a representative from EWA to discuss the potential for Renewable Energy Cooperatives (RECs) in Malta, with experts from [REScoop.eu](#), the European federation of renewable energy cooperatives. In particular, part of this discussion focused on the opportunity to include citizen participation in offshore renewable energy installations, with the example of [SeaCoop](#), a citizen cooperative in Belgium participating in offshore renewables. The federal government of Belgium decided they want to see significant citizen participation in offshore wind energy and announced that the tendering procedure for awarding of concessions for future wind farms will include specific conditions that award extra points to consortia including citizen participation. SeaCoop is aiming for 20% ownership of the wind farms to supply 20% of the electricity directly to citizens. This model provides an excellent example for Malta to follow, to ensure that direct citizen participation and energy democracy can be part of the offshore renewable energy revolution¹. This is the right time to include such conditions in guidelines and tender procedures, at the start of this new offshore renewable energy policy, and when the country has recently transposed the definitions for renewable energy communities in S.L. 545.35.

SEA/EIA processes

While we believe we should transition as much of our electricity generation to renewable energy sources as fast as possible, to move away from our fossil fuel based energy system, we would like to ensure that the acceleration of permitting does not erode essential checks and balances in the planning and permitting system. A streamlined and fast-tracked permitting

¹ <https://seacoop.be/en/press-release-federal-government-wants-significant-citizen-participation-in-offshore-wind-energy-seacoop-is-making-it-happen/>

system should still ensure that renewable energy projects do not have excessive social and environmental impacts on the marine environment and ecosystems, and that plans and permits are in line with other obligations, including the protection of marine ecosystems, notably Posidonia seagrass meadows, which as carbon sinks store large amounts of CO₂ and are vital as nurseries for reproduction of several marine species, and bird protection areas.

Potential negative impacts on fish, birds and mammals are mentioned in the elements that should be assessed in a Strategic Environmental Assessment (SEA). However, there may also be positive benefits and synergies between the creation of offshore renewable energy installations and Marine Protected Areas, as such sites would be (completely or partially) off-limits to other uses such as fishing, aquaculture and shipping with negative impacts on marine species, and could instead provide areas of protection for marine species. These potential synergies and ways to enable them further should also be explored in such assessments.

In the elements to be included in a SEA, potential conflicts are identified with areas which have oil and gas exploration licenses or are potential prospects. We strongly suggest that a stance is taken here, where renewable energy installations are prioritised over oil and gas exploration or exploitation, as the former is essential to the ambition to become climate neutral, whereas the latter is moving us further away from this goal. This is also underlined in the Renewable Energy Directive, which states “*in the planning and permit-granting process, the construction and operation of energy plants from renewable sources and the related grid infrastructure development is given priority when balancing legal interests in the individual case*” (quoted on p.27 of the Policy). Exploration for further fossil fuel reserves and investment in new fossil fuel infrastructure are incompatible with international climate goals, have both the Intergovernmental Panel on Climate Change (IPCC)² and the International Energy Agency (IEA)³ clearly and explicitly stated in recent reports.

Energy storage

Energy storage is essential in a system relying on intermittent renewable energy sources. This topic is (almost) completely omitted in the policy (storage is mentioned once in passing when quoting the Renewable Energy Directive). Since the potential production of ‘green hydrogen’ (produced via electrolysis from renewable energy sources) has been mentioned by the Ministry for Environment, Energy and Enterprise (MEEE) in relation to the proposed Melita TransGas ‘hydrogen-ready’ pipeline, a discussion of the potential creation, use, transport and storage of green hydrogen is expected in this Policy document, alongside a discussion of the need and merits of different forms of storage (such as batteries) and estimations of the required volume and uses of different identified storage solutions. A further discussion of the proposed Melita pipeline and the potential and risks of green hydrogen can be found in our recent report ‘[Towards a Fossil Free Malta](#)’.

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² IPCC, 2022. Mitigation of Climate Change, Working Group III Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.

https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf

³ IEA, 2021. Net Zero by 2050: A Roadmap for the Global Energy Sector. International Energy Agency, Report. <https://www.iea.org/news/pathway-to-critical-and-formidable-goal-of-net-zero-emissions-by-2050-is-narrow-but-brings-huge-benefits>