



TEN-E review must recognise seaports as key players in the energy sector

2 December 2020

ESPO welcomes the review of the TEN-E legislation. As nodes of transport, industry and energy, **European ports play a key role in the energy sector**. Ports do not just move containers; they are central to the supply lines of both conventional and renewable energy for industry, transport and consumers throughout Europe. Indeed, around 40% of all commodities moved through ports are energy-related. Their role covers the range of energy supply chains, from import and production to storage and supply. Furthermore, port managing bodies are taking up ever-more active roles in the energy transition; facilitating, investing in and even operating clean energy projects. For these reasons, **ESPO strongly believes the TEN-E review must consider the important role of ports in Europe's new energy systems**.

In particular, the **European Commission must support the necessary facilities and infrastructure in ports needed to accelerate the supply and transport of green hydrogen in Europe**. European ports support the intention of the Commission to include hydrogen in the revised TEN-E legislation and underline that this will imply new energy infrastructure and thus funding. The retrofitting of pipelines and LNG infrastructure will not be enough to serve the needs of the new hydrogen economy. Therefore, a dedicated section on hydrogen should be included in this revision (either as a chapter or annex) to allow for the construction of interconnected hydrogen pipelines across Europe. **Significant infrastructure investments are needed in ports which should be eligible for funding under CEF Energy and thus recognised in the TEN-E Regulation**. These infrastructure needs include inter alia: import and storage facilities (terminals and infrastructure) in ports, not only for hydrogen, but also for hydrogen carriers and hydrogen-based fuels, infrastructure supporting the supply of renewable and low carbon hydrogen via conversion as well as the processing of waste streams (heat and oxygen). Fuelling installations in ports should also be considered for funding.

Similarly, the TEN-E review must consider the importance of **green hydrogen imports**. In the European hydrogen strategy, import is overshadowed by the importance of local production. While ESPO underlines the importance of local production first, we stress that ports need to build the necessary infrastructure now in order to be able to import and supply the large amounts of green hydrogen necessary to decarbonise Europe. It is of strategic importance to focus now on partnerships with countries in which hydrogen can play a major role as an export product, both inside Europe and in countries with large amounts of renewables. Hydrogen imports also have a geopolitical dimension that the EU must recognise.

A number of ports that are important in the supply lines of hydrogen and other energy carriers are not included in existing gas or electricity corridors. In order to avoid missing out these key hubs of European energy supply lines - and to integrate hydrogen projects as efficiently as possible - ESPO recommends the **integration of new dedicated hydrogen infrastructure as a priority area** of the Regulation, either as a new chapter or a new section in Annex 1, and to add an explicit link between the new hydrogen corridors and the TEN-T network. The transportation of hydrogen through ports is significant because ports can play an important role in boosting the demand for hydrogen as hubs of transport and because the distribution and supply chains in ports will be fundamental to the transportation of hydrogen to the hinterland. In addition,

ports can contribute to the development of alternative fuels infrastructure along TEN-T corridors in order to supply hydrogen to inland industry clusters, bunkering infrastructure for inland navigation and fuelling stations for road and rail.

ESPO further stresses the need to continue to support the **production of other fuels of the energy mix** in ports, the hinterland transport of those fuels and related bunkering and recharging points. There are still needs for the development of LNG as a transitional solution before the development of zero or low emissions solutions. Other energy carriers are similarly important for industries located in the port cluster, from logistics and transport operators to mobility and heavy industry. Additionally, ports must develop green electricity infrastructure (from renewable sources including offshore wind, photovoltaic, ocean energy....) to ensure the production of green hydrogen.

To build new infrastructure and channel existing infrastructure to clean energy projects, European ports believe that the TEN-E review must **update its administrative and funding processes**. In particular, ESPO underlines that the funding of works - not only studies - should be eligible in the related funding instruments. Similarly, confusion around the eligibility of Carbon, Capture and Storage (CCS) works should be cleared up and made eligible for funds (on top of CCS studies). ESPO also notes that the review should include **provisions for projects with multiple energy infrastructures**, for example hydrogen and CO2 pipelines. This provides added value in terms of spatial planning processes and administrative processes.

ESPO emphasises that the current administrative process requiring renewals each two years of the **Projects of Common Interest (PCIs) is cumbersome and inefficient**. To reduce administrative burden and ensure certainty regarding funding opportunities, ESPO supports the establishment of the PCI list every two years, but stresses that projects with PCI status should remain on the list for at least four years.



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 Iceland, Israel, 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.