

Brussels, 14 December 2023

Observations from
Cooperation in Europe for Action on Wind power (CEAW)

On the European Wind Power Action Plan and the Wind Charter
(Communication COM (2023) 669 final -24.10.2023)

1. Foreword

The European Commission (EC) [communication COM \(2023\) 669](#) outlines a Union-wide wind power action plan (the “Plan”) in support of the Member States and of the EU wind manufacturing industry (EUWMI). EUWMI has indeed alerted the EC during the past two years about what they perceive as a **critical economic situation** resulting from the negative conditions prevailing in the EU wind market.

According to the EC and EUWMI, this dire situation is mainly caused by:

- **Insufficient and uncertain demand for wind turbines** resulting mostly from **slow and complex permitting** and other administrative procedures.
- **Price pressure from international competitors.**

This is said to require immediate action (that is before the end of 2023) to enable EUWMI to play its declared mission-critical role in the deployment of the Green Deal by **expanding its installed wind turbine (WT) capacity from 204 GW in 2022 to more than 500 GW in 2030.**

The communication COM (2023) 669 defines a six-step strategy as part of the Plan :

- A. Acceleration of WT deployment (more than doubling the current pace).
- B. Improved WT farms auction design (including “non-price” criteria).
- C. Access to finance (linked to item B).
- D. Fair and competitive international WT market environment.
- E. Access to skills (currently an EU otherwise scarce resource).
- F. Industry engagement and Member States commitments.

The Plan is therefore a **Plan/Program** with a major impact on the environment according to the criteria defined in Directive 2001/42 and subject to the terms of the **Aarhus Convention**.

As a consequence, **the EC invites the Member States and the wind industry to sign up, before the end of 2023, to voluntary commitments as part of a wind charter** (further the “Wind Charter” (see Action 15 of the Plan). **The EC will work closely with Member States and**

industrial stakeholders to develop the precise commitments of the Wind Charter in consultation with social partners.

CEAW participants, as qualified social partners, wish to participate actively in the identification and specification of the above Wind Charter commitments. They seek to contribute to the establishment of the specifications required to guide the regulatory authorities and EUWMI into the execution of the Plan.

The issues of concern to the participants of CEAW are in particular the following.

2. Conditions for an environmentally safe deployment of wind turbines (WT).

2.1 The recent “acceleration” policy (as enacted in Union rules such as regulation 2022/2577) is resting on the “urgency” criterium leading itself to the notion of “overriding public interest”.

This has opened the possibility that the protection of biodiversity will be significantly reduced in order to make available more territory to the wind industry (at the expense of inter alia agriculture and forestry). This trend would be contrary to the aim and spirit of major provisions of Union environmental legislation.

CEAW participants wish to convey the following message:

“The long-term interests of human beings and of biodiversity at large cannot be jeopardized in order to rescue a currently ailing industry of which the true and effective role in the EU decarbonization strategy is not scientifically quantified yet. Acting otherwise would go against the fundamental long-term interests of the Union.

The Wind Charter should therefore reflect this requirement by instructing the stakeholders to undertake a comprehensive public (that is submitted to the European Parliament and to Union citizens) environmental impact assessment of the proposed EU Wind Action Plan”.

2.2 Do WT demonstrably improve the CO2 intensity of consumed electricity?

The massive deployment of WT is primarily an attempt to respond to the “climate crisis” as it is expected that WT provide electricity at the user meter with a significantly lower CO2 intensity (gCO2/kWh) than electricity generated from fossil fuel. However, the inherent limitation of WT efficiency, namely “intermittency”, makes WT fully dependent of fossil fuel fired power stations (or other steerable power generators) which contribute in an unknown amount to the final CO2 intensity of the electricity actually consumed.

The claim that electricity network balancing (resulting in part from wind generated “intermittency”) has no significant effect on the CO2 intensity of the electricity consumed by end users has, so far, not been convincingly demonstrated (either for onshore and offshore wind electricity) to the European Parliament and Union citizens by appropriate, independent and opposable measurements.

The absence of such demonstration is currently one of the main issues that motivate the resistance of citizens to the delivery of WT permits.

Technological advances such as electricity storage (batteries, H², etc.), intelligent distribution networks and customer intelligent meters are deemed to reduce both the consumption peak/offpeak ratios. Yet, these facilities come at a considerable cost that must be accrued to the direct costs of wind turbines operation : “wind must pay for itself”.

CEAW participants wish to convey the following message:

“Facilitating the administrative permitting procedures in the absence of scientific evidence (beyond mere declarations) of a major improvement in CO₂ intensity at the consumer meter is certainly not improving the acceptance of WT by rural citizens. By contrast, such “facilitation” alone is bound to be perceived as a significant rebuke to the democratic political management expected from the Union and to the credibility of the objective of decarbonization.”

2.3 Which onshore WT acoustic emission levels (over the entire frequency range) are fully compatible with a healthy human environment?

This question is recurrent since the early years of WT deployment. The answer has been said by the wind industry to be notoriously complex, not the least because of the rapid increase in size and power of, and therefore also acoustic emissions from, WT.

The Commission has, so far, not been willing to address the issue either in the context of the ongoing amendment of the Industrial Emissions Directive (2010/75) or on the basis of the Noise Directive (2002/49).

CEAW participants wish to convey the following message:

“Multiplying the installed wind capacity in the Union will exert a considerable additional environmental pressure on Union rural citizens (20 % of the total population). It is therefore not conceivable that such a major industrial deployment be executed without a proper regulatory framework specific to wind turbines acoustic emissions. The current situation where the wind industry has been able to build up over 200,000 WT without such a framework is one of the causes of resistance to further permitting by Union citizens. A proper Union regulation of wind turbine acoustic emissions (the entire spectrum) should be established as a key item of the European Wind Power Action Plan, a task that should be reflected in the Wind Charter.”

2.4 Offshore WT deployment has been considerable over the past few years. The absence of steady offshore human presence has facilitated the buildup of very large clusters of WT and many more are planned in the North Sea, in the Baltic Sea and further North as well as in the Atlantic Ocean (Spain, Portugal, France) and the Mediterranean Sea (Spain, France). This creates a situation where large zones, crowded with powerful WT, will experience new environment conditions under and above the sea level, possibly in areas extending much further (offshore and onshore as well) than said zones. Several indications exist already today

that signal the materiality of the disruptive actions (offshore and onshore) of large-scale WT operations.

CEAW participants wish to convey the following message:

“Since the conditions under and above sea level are of paramount importance to the European continent biodiversity and living conditions, a comprehensive and independent environmental impact analysis of the current and foreseen large scale offshore WT deployment must be conducted. The analysis should cover all areas of the European seas and lands subject to the modified conditions”.

2.5 Particular attention should be paid to long-lasting pollution generated by WT operation.

Under optimal conditions the 500 GW of wind capacity (year 2030) would entail the operation of 100,000 5MW WT. This requires 300,000 100m long blades weighing some 6 ,000,000 metric tons. At a conservative rate of erosion of 0.5%/year, the fleet would release some 30,000 tons/year of long-lasting toxic materials in the air. Altogether, the vast amount of material imbedded in the 300,000 WT loaded with various “negative effects” on the environment should be factored in the above requested (§ 2.3) environment impact analysis.

In addition, the occupation of about 75,000 km² of land and sea in Europe by a single industry will cause a considerable amount of systemic nuisances that can only trigger a common antagonism from Union citizens.

The CEAW participants wish to convey the following message:

“Electrical power generation has always been associated with various forms of pollution which, for most parts, have been ignored until recently. GEG emissions are a paramount example. Today’s improved understanding of the negative biological impact of many chemical components makes the release of such components in the biosphere not acceptable anymore. On a similar line of thought, a thorough assessment of the impact of all chemicals associated with the life cycle operation of WT is therefore necessary before the EU Wind Power Action Plan is implemented. The assessment should be made public (to the European Parliament and to Union citizens) and performed with the best available procedures and techniques with a focus on long-lasting polluting materials.”

3. Conditions for an economically efficient execution of the European Wind Power Action Plan.

The current economic difficulties of the EUWMI can be summarized by the following trends affecting WT installations worldwide:

- (i) Rising cost of commodities

As material input to WT installations is high, especially compared to the amount of electricity provided in the life span of a WT, EUWMI and their international competitors are exposed to the market prices of commodities like copper, steel, rare earths and the associated freight cost. These materials costs have somewhat levelled in 2023 but remain higher than before the Covid crisis. Rising material costs are cited as an important reason for recent cancellations of WT installation projects, i.e. the stopping of Vattenfall's Norfolk Boreas offshore wind farm and of Orsted's WT projects in the USA.

(ii) Rising cost of capital

As wind projects are highly capital-intensive with a volatile financial output the EUWMI is highly dependent on financing costs. These have risen sharply from a former regime of low interest rates thus challenging the profitability of WT installations.

(iii) Rising engineering risks

Recent announcements by the WT industry, notably Siemens Energy, have raised the question whether the wind industry is facing truly substantial issues with the failures of WT and some of their key components. Indeed, the necessity to deliver fast innovations to address the poor energy output of WT in comparison to other conventional electricity sources has recently put a considerable pressure on EUWMI to provide such innovations at the cost of quality assurance.

None of these three EUWMI challenges can, nor should, be addressed through subsidies and/or fiscal measures. The rising cost of material and capital are a risk that typically every industrial player faces and the provision of subsidies may hinder industrial players from providing cost-effective solutions to address these issues. This is also clearly true for engineering risks (as conceded by Siemens Energy) which should be addressed without any public money intervention. Acting otherwise would result in additional costs to the already high electricity price to be paid by the EU consumers, as being witnessed today.

CEAW participants suggest therefore the following questioning : do the current public interventions provide a benefit to the society ?

Focusing on **manufacturing** of WT in Europe, it should be asked why policy should be preferable to buying them abroad? The most cited argument is the provision of jobs within the EU. This argument however underestimates the fact that, in order to provide subsidies to an industry, it is obvious that a State must raise taxes in profitable areas thus preventing the creation of jobs in more profitable sectors. The same interrogation applies to the **operation** of WT since subsidies to WT plants disadvantages other technologies able to generate electricity in a more economically effective way. Consequently, subsidy measures reduce the total wealth of the European society by withdrawing capital from the most beneficial economic cycle.

CEAW participants wish to convey the following message:

“The long-term economic consequences of subsidizing WT manufacturing and operation are unclear as today and, so-far, it has not been shown that such strategy is suitable to ensuring the most efficient allocation of resources to maximize the wealth of the citizens of the EU.”

4. Request of CEAW to participate into the preparation of the Wind Charter.

Following the above remarks and statements and the indications provided in communication COM (2023) 669, Action 15, whereby *“The Commission will work closely with Member States and industrial stakeholders to develop the precise commitments of the charter, in consultation with social partners”* and considering that the European Wind Power Action Plan is a plan/program as defined by Directive 2001/42, CEAW submits the present information and request to the European Commission.

4.1 CEAW is an informal platform whose mission is to coordinate the actions of environmental associations, established in Union Member States, with a view to improving, at EU level, the rules applicable to the deployment of renewable energy with due respect to citizens and to biodiversity.

4.2 The associations of CEAW have undertaken legal action with regard to the absence of Union rules on the measurement and management of acoustic emissions from wind turbines, to the taxonomy of wind power generation and to the acceleration of wind power development.

4.3 CEAW is a non-political coordination of environmental associations, independent from any industrial or financial actor and independently financed through voluntary contributions of CEAW associations own members.

4.3 The above legal actions together with a number of similar undertakings in the Member States, are evidence of the active role of CEAW associations as social partners in the current EU debate over renewable energies and, particularly, wind energy.

On the basis of the above credentials, the associations of CEAW request to participate in the preparation of the Wind Charter and in the further implementation of the European Wind Power Action Plan set out in communication COM (2023) 669.

Yours sincerely,

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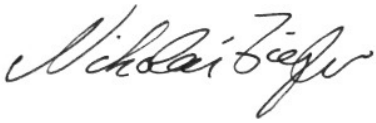
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