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Session: Just Transition and Transformation of the Coast and Maritime

Title Just transition and Stakeholder engagement, experience from Wind offshore planning in Italy.

The case of offshore wind in Italy and stakeholder engagement approach offers interesting food for thought ranging from the risk that the just transition turns being 'unjust' for the traditional marine space's stakeholders if not properly engaged in the stakeholder engagement process, to the lack of structured requirements for stakeholder engagement in the permitting process, to the capacity of some developers to anticipate trends and potential negative impacts, and the potential possible delays in the authorization process, by submitting social management plans to the competent authorities (ie. the submission of a SEP and a socio-economic analysis by Vestas in the scoping phase for 2 projects to Italian authorities) or appointing Stakeholder Engagement experts in the EIA phase preparation.

Back in 2021, the Italian Government launched a public notice to developers to submit their interest to develop wind offshore projects, recording the interest of 64 stakeholders to be involved in the wind offshore development roundtable. While 55 are private individual companies or association of companies, only 3 environmental NGOs expressed an interest to consultation together with 7 stakeholders from diverse domains (Universities and researchers' associations, 1 trade union, etc.). No traditional stakeholders of the marine space (fisher associations, above all) officially expressed an interest to the roundtable consultation on offshore wind. The approach of the Italian Government to offshore wind development is to be interpreted as an 'open-door policy' which means that developers can take the lead by proposing projects on site they have identified. This approach is opposite to the 'call for tender method', implying that governments perform the site selection process to release the tender to select the final developer.¹

In the context of the energy transition and the necessity to 'securitize' national energy supply, national Governments are supporting developers' initiatives for offshore wind projects all over the world, including the European Union. The 2023 National Integrated Plan for Energy and Climate (PNIEC) developed by the Italian Government considers offshore wind as an 'innovative technology' at national level thanks to their potential to minimize impacts related to environment and landscape, especially for floating solutions. Given the specificity of those infrastructures, the Plan stresses out the importance of proceeding in parallel with the development of the necessary infrastructures, in particular port ones, and coordinating with the regional land planning and the network development planning by the national grid provider, to balance wind conditions, impact on the electrical grid, local impact, and implications for the territories. ² It is in this framework, that a National Public Notice was published to request that Italian Port Authorities express their interest to host the development of shipbuilding to establish the offshore wind technology supply chain as from 18/04/2024.³

As media articles had disclosed information and location of the proposed projects, some traditional stakeholders have expressed concerns related to conflicting interests with offshore developers (through press releases and yearly reports of fisher associations) thus increasing the level of attention of public authorities and civil society about the emerging conflicting interests with energy developers in the marine space.

As of April 2024, Italy's Ministry of Environment and Energy Security had received 3308 Environmental Impact Assessment requests for projects all over Italy of which the following are related to Offshore

¹ 'Recommendations for positive interactions between offshore wind farms and fisheries' by Clément Dupont, Frédérick Herpers and Christophe Le Visage, May 2020 available at https://op.europa.eu/en/publication-detail/-/publication/056c9ec0-d143-11ea-adf7-01aa75ed71a1/language-en

² Https://www.mase.gov.it/sites/default/files/PNIEC_2023.pdf

³ https://www.mase.gov.it/comunicati/energia-mase-al-manifestazione-di-interesse-eolico-shore-nei-porti

- 78 Scoping Requests since 2019, of which 47 concluded with Scoping opinion.
- 20 EIA Studies, of which 3 with positive opinion since 2006. It is important to note that only 9 of the 20 are dated from 2022 onwards, and only 1 obtained a positive EIA opinion.

Figure 1 is taken from the website of the Ministry of Environment and Energy Security of Italy, showing that most of the wind offshore projects are in Southern Italy, mainly in the marine area of the region of Sicily, the biggest Italian island, located in the Southern part of Italy).



Figure 1: EIA procedures ongoing (as of April 2024)

Source: https://va.mite.gov.it/it-IT/Procedure/ProcedureInCorso

Proposed wind offshore projects risks overlapping with the interests of the fisher industry. Data extracted from the database of the Italian fishing Industry show a concentration of the fisher fleet (in terms of individual harbours used) that are numerical higher in Southern Italy (Figure 2) and specifically in Sicily (Figure 3).



Figure 2: Number of Harbours used by the fishermen industry per Italian areas Source: https://osservatoriopesca.shinyapps.io/registroFlotta/

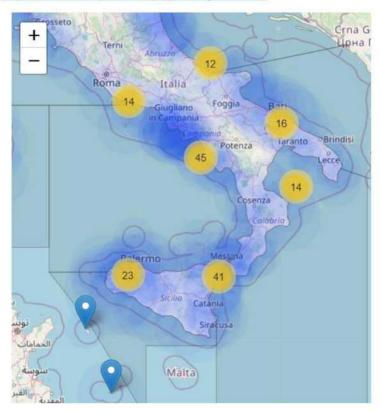


Figure 3: Number of Harbours used by the fishermen industry in Italian areas, focus on Southern Italy Source: https://osservatoriopesca.shinyapps.io/registroFlotta/

Italian fishing category association have recently started lobbying to promote their interest and investigate the potential interactions with offshore wind parks. A study dated February 2024 by LegaCoop claims that the new offshore developments will take away to professional fishing about 13.000 sqm of marine surface (mainly due to bottom trawling use) with a negative impact on occupation in the professional fishing sector estimated to a loss of 4.000 workers, of which more than 2000 ones will be from the Sicily area. ⁴

Interestingly, the potential temporary reduction/ displacement in fish and shellfish resources is not mentioned. However, some of them manifest a 'sense of ownership' of the marine space being the traditional users and having acknowledged by the local communities an important socio-cultural role.

As Figure 4 shows some areas potentially will host a concentration of wind offshore parks thus complicating interactions with the traditional marine space stakeholders for the use of trawling fishing.

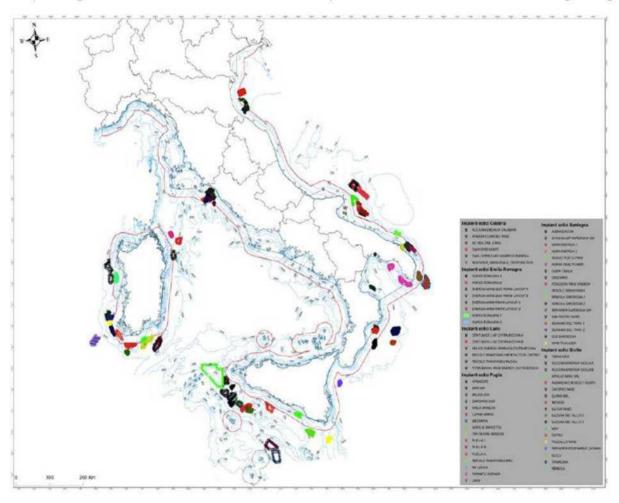


Figure 4: Geolocation of proposed Wind Offshore Parks

Interestingly, the awareness of the potential conflicting interest among the old and new category of the marine space has stimulated new trends in stakeholder engagement within the national permitting process:

- Some developers have started to voluntarily include additional socio-economic studies and/or submit Stakeholder Engagement Plans to the authorities to publicly disclose a commitment to engage communities in a structured manner and make them part of the decisions on shared benefits.
- 2) The analysis of the prescriptions received by offshore wind developers in the framework of the scoping phase returns a trend by the Italian public authorities to request that the

⁴ "Reconnaissance and in-depth study on the development of activities linked to alternative energy resources (off-shore wind farms) and interactions with fishing and aquaculture activities", press release available at https://www.legacoop.coop/eolico-off-shore-lallarme-di-legacoop-agroalimentare-a-rischio-attivita-di-pesca/

Environmental Impact Assessment Study relates of the stakeholder engagement with <local communities and representatives of the impacted economic activities> and that a <contextual socio-economic analysis focused on potential impacts on landscape impacts, touristic activities and fishing ones> are provided.

As for the voluntary initiatives of some developers, socio-economic studies have been submitted in the framework of the permitting process and documented stakeholder engagement at national and local level has been put forward since the scoping phase.⁵ This is a new approach for stakeholder engagement in Italy and could positively influence the readiness of public authorities to examine social management plans and socio context analysis with a view on benefits' sharing through a structured and transparent process of consultation.

In parallel, or maybe as a follow-up of some early-stage initiative from the past⁶, the commission in charge of assessing environmental documentation for scoping phase is giving new 'prescriptions' requiring reporting of past engagement and knowledge of the socio-economic context. This is hopefully going to change the approach to stakeholder identification in early stages in Italy by authorities at national and local level so to achieve more proactive ways to engage stakeholders, assess potential impacts and offer effective management and mitigation measures to achieve a just transition.

As a closing remark, the increasing geopolitical tension in the Mediterranean Sea (and elsewhere) have brought some private developer companies of the oil & gas sector to map human rights risks at the ESIA phase related to migrants crossing the sea and the obligation to provide rescue to those under the maritime conventions. Hopefully the 'just transition' will accelerate the recognition of migrants as marine spaces' stakeholders also in the ESIA process and provide clear procedures to construction companies in charge of offshore works.

⁵ See the Stakeholder Engagement Plans submitted by Vestas to the national authorities in the scoping phase: https://va.mite.gov.it/File/Documento/652468 and https://va.mite.gov.it/File/Documento/650660

⁶ As an example, the stakeholder engagement efforts undertaken by the Trans Adriatic Pipeline to overcome local opposition in Italy, starting from local fishers https://www.tap-ag.it/notizie/nuove- storie/compensazioni-ai-pescatori-di-san-foca-firmati-gli-accordi