

Public Consultation on Preparing an Offshore Renewable Energy Strategy

CEER Response for the European Commission

23 September 2020

This is a response to the European Commission’s Public Consultation on an EU Strategy for offshore renewables (https://ec.europa.eu/info/news/preparing-eu-strategy-offshore-renewables-have-your-say-2020-jul-16_en). The consultation period was for 10 weeks, closing on 24 September 2020. CEER’s response is public, and will also be found on the European Commission’s website, as CEER submitted the response on 21 September 2020. Per the European Commission, the idea of the consultation was to “...hear your views on how to make the European offshore renewable energy strategy as sustainable, effective, inclusive and ambitious as possible. Share with us your ideas, advice or practical examples related to the proposed topics, existing activities you know of or are involved in, and possible new activities in the context of offshore renewable energy.” The consultation consisted of a number of questions via an online questionnaire. The questions and CEER’s responses can be found below.

Questions

1. Your involvement in offshore activities and interest in the strategy

The strategy aims at better exploiting Europe's sustainable offshore renewable energy potential. In this section, we would like to ask you some questions regarding your interest in offshore activities and your perceptions of the current and emerging needs that would enable a large and sustainable development of the offshore renewable energy sector.

1.1. To what extent do you agree or disagree with the following assertions related to your knowledge and perception on offshore renewable energy?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I do not know
I have a good knowledge on the existing offshore renewable energy technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
I think offshore renewable energy is not sufficiently exploited today in Europe	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
I think my Member State/the Member State where my organisation is active should foster the deployment of offshore renewable energy with adequate policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
I think the European Union should foster the deployment of offshore renewable energy with adequate policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
I think the development of the offshore energy sector in the EU could play a major role in recovering from the current Covid-19 related economic crisis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
I think the deployment of offshore renewable energy needs to be accelerated in Europe	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please elaborate your answers if you deem necessary:

CEER welcomes any efforts to promote the integration of electricity from RES in the markets. We advocate to remove all possible obstacles to allow an efficient and least-cost decarbonisation of the energy system. To this end, CEER and its members will continue to work to promote flexibility and to integrate renewables fully into the market and the grid. Cost-efficient decarbonisation of the energy sector needs a cross-sectoral (electricity and gas) and whole system approach.

1.2. To what extent do you agree or disagree with the following assertions?

The deployment of offshore renewable energy...

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I do not know
...will benefit the EU's security of energy supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...will benefit the EU's industries and companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...will benefit EU consumers and local communities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...will benefit EU employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please elaborate your answers if you deem necessary:

Delivering sustainable, secure and affordable energy for all European consumers is at the heart of the EU's Internal Energy Market. Within this context, CEER recommends ensuring a level playing field in which competition can flourish and to provide a sound investment framework that is based on predictable regulatory principles and competition. Therefore, EU consumers, other generators and local communities will benefit from the measures.

1.3. Are you or your organisation involved or have an active interest in offshore activities?

- Yes
- No

If yes, what is your interest (oil and gas, ocean energy manufacturer, ocean energy financier, ocean energy project developer, maritime transport, fishery, NGOs, coastal communities...)?

Regulation of offshore elec. trans. networks and interconnectors, national RES schemes implementation.

1.4. On an annual basis, what part of your personal / your organisation's business activities (allocated budget) are related to offshore renewable energy?

- Very few - less than 5%
- Some activities - between 5% and 50%
- Many activities - more than 50%
- Most activities - more than 90%
- Do not know

1.5. How would you qualify the following actions related to the deployment of offshore renewable energy in the EU?

	Not necessary	Neutral	Necessary but does not require EU measures /initiatives	Necessary and requires EU measures/initiatives	Do not know
Improving access to and use of sea for offshore energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Implementing a more suitable market regulatory framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Developing/Improving onshore and offshore grid	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving financing conditions, support and incentives, and developing new business models	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fostering training, human capital development and capacity building	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting the development of the industrial infrastructure and supply chain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting research and development, innovation and technology development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving regional and transnational cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving public understanding and support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

1.6. What initiatives could incentivize you/your organisation most to increase your offshore renewable energy activities?

at most 3 choice(s)

- Facilitating permitting and authorisation
 - Cross-border cooperation to allow a long-term maritime plan that foresees enough room for offshore renewable energy
 - Support the adaptation of the energy network to the large scale-up of offshore renewables
 - Support to research and innovation and for commercial scale demonstration plants
 - Stronger harmonisation of technical requirements and/or regulatory frameworks at EU level
 - Greater knowledge of existing support measures which I/my organisation can benefit from
 - More regional and transnational cooperation including with countries outside the EU
- Renewables policies setting [sector specific] targets and trajectories
- Improved financing conditions, support and incentives
- Availability of skilled workers and targeted retraining opportunities Other

Other

Market design for offshore hybrid assets enabling investment in offshore wind and interconnection.

Please elaborate your answers if you deem necessary.

In the current practice, a hybrid project is seen as any offshore wind project which is not connected radially to the shore, or any offshore cable which does not solely act as an interconnector; that is, any project in which cables act simultaneously or alternately as interconnectors or export cables.

2. Sustainability, environmental protection

2.1. To what extent are the environmental impacts of offshore renewable energy activities currently considered by project developers in your country? Not at all

- Very little
- Somewhat
- Significantly
- Very much
- Too much
- Don't know

2.2. What could be the main environmental issue related to the deployment of offshore renewable energy?

- There is no major environmental issue related to the deployment of offshore Issues are compensated by positive impacts (reserve / biomass effects, reef effects...)
- Wildlife environmental negative impact: impact on fish, birds...

- Marine ecosystem negative impact: impact on the marine flora and fauna.
- Pollution and climate negative impacts
- Other [100 characters maximum]

2.3. What measures at EU level could help the most to ensure the sustainable development of offshore renewable energy?

at most 3 choice(s)

- Sustainable building and installation of offshore assets
- Sustainable operation and maintenance activities
- Sustainable management of assets end-of-life: decommissioning, recycling of components
- Sustainable supply chain (decarbonisation of externalities, use of raw materials)
- Mitigation measures of the impact on marine ecosystems
- Maritime plans with clear determination of areas that are suitable for offshore wind
- Planning of optimized offshore electric grid infrastructures at regional

/transnational level

- Other [300 characters maximum]

Other

In general, sustainable development principles and the Sustainable Development Goals should be taken into account; as these are applicable to all policy and legislative measures. It must not be forgotten to take these on board.

Please explain your answer.

3. Public Information

3.1. To what extent do you agree or disagree with the following assertions related to consulting the public when developing offshore renewable energy projects?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I do not know
Information (technical, financial, regulatory) is easily available to public	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Public consultation is sufficiently taken into account within projects development processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional measures/regulations need to be taken at EU level to strengthen public consultation processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer.

3.2. What measures at EU level could help the most to inform the public on offshore renewable energies?

at most 3 choice(s)

- Better public information on offshore technologies
- Better public information about the general energy choices needed to decarbonise the EU economy
- Better public information on the environmental impact (negative and positive) of offshore renewable energies (construction and installation activities, material uses...)
- Better public information on the potential for industry and workers in Europe (growth, employment...)
- Better public information on economic models of offshore renewable energy (costs, impact on electricity prices for consumers...)
- Other [300 characters maximum]
- No need to increase public support to offshore renewable energy

4. Marine Resources and Human activities at sea (Maritime Spatial Planning) [1],[2]

The ability to secure, access, use and share maritime space in a sustainable way will be crucial for the large-scale development of offshore renewable energy in Europe. To that end, maritime spatial planning is required and multi-use of marine space might be beneficial for all sectors involved in the mid- to long-term perspective.

[1] Within this questionnaire, the term “marine” is used to refer to the natural sea ecosystem at large whereas the term “maritime” is used to refer to human activities related to the sea.

[2] Maritime Spatial Planning- DIRECTIVE 2014/89/EU.

4.1. Do you think the access to sea is a limiting factor to the development of offshore renewable energies?

- Not at all
- Very little
- Somewhat
- Significantly
- Very much
- Don't know

4.2. Have you or your organisation been confronted with space issues at seas related to offshore renewable energies?

- Yes
- No

4.3. To what extent do you agree or disagree with the following assertions related to use and sharing of seas for renewable energies activities?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I do not know
Integrated sea-basin strategies are crucial for the development of offshore renewable energies and grid	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting and fostering multi-use of sea is crucial for offshore renewable energy deployment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compensation should be provided to activities that might be excluded because of offshore renewable developments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Energy grid, market and renewable policy

The deployment of large-scale offshore renewable energy will require some adaptation to the EU energy system in terms of infrastructures, market arrangements and renewable policies. Notably, considerable offshore and onshore grid development will be needed to ensure the transport of large amounts of energy to shore and, from there, to cities inland and large consumption sites.

5.1. How would you rate the importance of the following objectives to steer the development of European offshore energy infrastructure?

	Not Important	Important to a small extent	Important to a large extent	Important	I do not know
Enable decarbonisation of EU energy sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Enable a competitive and properly functioning integrated energy market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthen EU energy security of supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

5.2. In what order of priority should the European Commission consider the following measures related to the deployment of offshore renewable energy?

[1 being the highest priority, 4 the lowest]

	4	3	2	1
EC action should deliver significant contribution to renewables targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EC action should keep overall system costs to consumers as low as possible	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EC action should integrate renewables efficiently and sustainably in the energy system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EC action should bring certainty on project revenues for developers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer.

Despite the requested (mandatory) prioritisation, we consider that all listed priorities are important, as they can't be achieved without each other.

5.3. Regarding the regulatory framework, what measures could help most with the deployment of offshore renewable energy in the EU?

at most 2 choice(s)

- Making the access to finance and funding, and support schemes and incentives easier
- A more integrated and cross-sectorial energy strategy
- A clearer market regulatory framework
- A concrete EU development plan with clear commitments and capacity targets
- Clarify and facilitate permitting and authorisation of offshore grids and assets Other [100 characters maximum]

Please explain your answer.

5.4. Regarding the regulatory framework...

5.4.1 Do you think EU guidance on how to apply market rules in the offshore renewable energy sector is required?

- Yes
- No

If Yes, please explain your answer.

New technologies and developments such as hybrid infrastructure raise new issues, e.g. conflict/trade-off between CEP's 70% rule and priority dispatch rules. A framework is needed to enable these types of projects, considering possible technological add-ons coupling

different energy types (electricity, methane, hydrogen...). EC guidance is needed on how to apply the existing rules to offshore RES and hybrid infrastructure/grid development, with certain exemptions and/or some specific rules.

5.4.2. Do you think a stronger market regulatory harmonisation, e.g. of system operation or grid connection rules, is required?

- Yes
- No

If Yes, please explain your answer.

We need clear and concrete guidance from the EC on the application of existing rules.

5.4.3. Do you think the current regulatory environment in my home country is ensuring that investments into offshore fixed bottom /floating wind or other technologies (please indicate in your answer) are sufficient and allow a return on investment in a reasonable time?

- Yes
- No

5.5. Offshore wind/other technology (please indicate which in your answer) are best promoted through...

- Market premiums and/or contracts for difference
- Power Purchase Agreements (PPAs)
- Sharing arrangements for grid connection costs
- New local or regional level business models, incl. cooperative approaches Other...

Please explain your answer.

6. Industrial development, employment and human capital development

Developing offshore renewable energy requires a suitable industry and infrastructure, while a workforce with the necessary knowledge, skills and training is essential.

6.1. What measures could help the most to develop the offshore renewable industry in the EU?

at most 2 choice(s)

- Improved access to existing financing, support and incentives /Develop new financing, funds, incentives
- A more integrated, cross-sector industrial strategy
- A clearer market regulatory framework
- Development of skills and occupational safety and health across the value chain
- Other [100 characters maximum]

Other:

Mechanism for landlocked MS to support offshore so the RES produced counts toward national targets.

6.2. In your opinion, what are the biggest obstacles to the development of an offshore renewable industry in the EU?

at most 3 choice(s)

- Political buy-in and long-term investment certainty
- Procurement of raw and critical materials
- Lack of skilled staff and/or human capacity building provision
- Lack of industrial infrastructures (manufacturing, transport, building)
- Unawareness of/Difficulties to have access to funds
- Financing costs
- Uncertainty about an EU offshore development plan
- Uncertainty regarding the legislative framework
- Uncertainty regarding the long-term economic benefits
- Regulatory obstacles
- Lack of support to SMEs
- Other [100 characters maximum]

6.3. Which categories of qualified workers with specific offshore renewable energy knowledge are most needed today?

at most 2 choice(s)

- Technicians
- Engineers
- Researchers
- Sustainable finance experts
- Other [100 characters maximum]

6.4. In which sectors of the offshore renewable energy industry is the development of knowledge and skills most needed today?

at most 2 choice(s)

- Manufacturing of critical components (including infrastructure components)
- Research and development
- Onshore and/or offshore transport of critical components
- Installation, Operation and Maintenance
- Other [100 characters maximum]

7. Research and Innovation

7.1. What are the main areas of technology on which Research and Innovation should focus in order to help the development of large-scale offshore renewable energy in the EU?

at most 4 choice(s)

- Wind Turbines technology
- Tidal stream technology
- Wave energy technology
- Ocean thermal energy conversion, Sea-Water Air Conditioning
- Salinity gradient technology
- Floating PV
- Maritime transport innovations
- Infrastructure and supply chain innovations
- Recycling and decommissioning solutions
- Offshore energy conversion and storage innovations (power-to-X, energy islands concept...)
- Environmental and biodiversity protection related technologies
- Control and monitoring systems innovations for offshore assets
- Resource assessment
- Other

Please explain your answer.

7.2. Have you ever been involved in a Research and Innovation project related to offshore renewable energy?

- Yes
- No

8. Funding & Financing

8.1. To what extent are you aware of EU funding or financing programmes supporting offshore renewable energy development?

- I am not aware of any relevant EU funding or financing programmes
- I am aware of some relevant EU funding or financing programmes
- I am well aware of relevant EU funding or financing programmes

8.2. Which sectors do you think EU funding or financing programmes should prioritise in order to promote the development of renewable offshore energy in the EU?

at most 2 choice(s)

- Research and Innovation

- Pilot and pre-commercial projects
- Upscaling and faster deployment supporting national deployment
- Industrial capacity and infrastructure
- Skills, knowledge and vocational education training
- Maritime transport and ports upgrading
- Export support
- Other [100 characters maximum]

Please explain your answer.

8.3. To what extent do you agree or disagree with the following assertions related to funding and financing in the context of offshore renewable energy projects development?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I don't know
Access to dedicated revenue support at national level is essential to unlock pilot and pre-commercial projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU instruments are needed to reduce financing costs of innovative offshore renewable energy by providing grants, guaranteed loans, or concessional lending.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted EU instruments are needed to support training, reskilling and upskilling to ensure availability of a skilled workforce	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Channel existing EU R&I funding into offshore renewable energy is required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Streamlining due diligence and similar timelines to access different financial instruments is required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Building international partnerships with 3rd countries to mutualise investments is required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financing support for development of European value chains and production of equipment within the EU for deployment internationally.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support provided in the EU programmes suffices but should be better utilised by the offshore renewable energy sector.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Regional and transnational development policy and cooperation

9.1. To what extent do you agree or disagree with the following assertions related to regional and transnational issues in the context of offshore renewable energy deployment?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	I don't know
Offshore renewable energy development could be relevant and positive for the region in which my organisation is active (specify which region in the box available below this table)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Offshore renewable energy development could be relevant and positive for any region of the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The lack of transnational cooperation might be an obstacle to the development of the offshore renewable energy in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The EU should play a major role in steering the cooperation between countries and regions to foster the development of offshore renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer.

9.2. In which areas do you believe that transnational and regional cooperation is the most crucial to contribute to the deployment of offshore renewable energy?

at most 3 choice(s)

- Energy grid development
- Maritime spatial planning
- Integration of the supply chain
- Development of clusters and new industrial ecosystems
- Transport
- Support schemes

- Tender procedures
- Research and Innovation
- Financing
- Permitting
- Other [100 characters maximum]

Other

Transport, here referring to TSO activities.

9.3. What are the main obstacles of cross-border cooperation at the moment in grids, markets and offshore renewables?

10. Ideas and suggestions for further development

The European offshore renewable energy strategy will build as much as possible on existing frameworks and initiatives to enable the massive development of offshore renewable energy.

10.1. How do you believe the strategy can best complement or scale-up existing national and EU frameworks and initiatives and add value? Please refer to the specific frameworks/initiatives considered (maximum two)

Offshore strategy can best complement the Clean Energy Package and the TEN-E Regulation. Therefore, any new proposals should go hand in hand with other initiatives such as the smart sector integration, methane and hydrogen strategies.

10.2. Do you believe there are excessive regulatory burdens or regulatory inconsistencies that need to be addressed to support the development of offshore energy?

If so, can you specify precisely which and at which level (EU or national).

New technologies and developments such as hybrid infrastructure raise new issues, e.g. conflict/trade-off between CEP's 70% rule and priority dispatch rules. A framework is needed to enable this type of projects, considering possible technological add-ons coupling different energy types (electricity, methane, hydrogen...). EC guidance is needed on how to apply the existing rules to offshore RES and hybrid infrastructure/grid development, with certain exemptions and/or some specific rules.

10.3. Are you aware of any material/documentation (position papers, databases, studies) that would be relevant for further information? Could you please list relevant sources of information?

CEER Report on Tendering Procedures for RES in Europe, 2018

CEER Status Review of Renewables Energy Support Schemes in Europe 2016-2017, 2018
CEER Paper on Whole System Approaches, 2020
Digitalisation, Decarbonisation, Dynamic regulation: CEER's 3D Strategy, 2019
ACER/CEER Conclusions paper: The Bridge Beyond 2025, 2019
ACER/CEER Position on Revision of the TEN-E Regulation, 2020

10.4. Documents upload and final comments

Please feel free to upload a concise document. The maximum file size is 1 MB. The uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

[None uploaded]

10.5. If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.

[None added]