To: European Commission's DG MOVE

Subject: IMCA feedback on the EU Ports Strategy Call for Evidence

The International Marine Contractors Association (IMCA) welcomes the opportunity to provide input on the European Commission's Call for Evidence regarding the EU Ports Strategy Call for Evidence.

IMCA represents more than 800 companies globally, around half based in Europe. Our membership spans the contractors, their supply chain, and energy companies in the offshore marine construction industry. Our aim is to enable the safe and sustainable development of marine energy resources, supporting the EU's ambitions to transition to clean energy while ensuring a resilient blue economy.

IMCA members play a critical role in constructing, installing, and maintaining offshore wind farms, subsea infrastructure, critical telecoms and power cables, and marine energy systems. With the EU targeting over 300GW of offshore wind capacity by 2050, this will require 30,000 new wind turbines and associated infrastructure, all of which depend on a highly specialized fleet of vessels operated by IMCA members. These vessels and companies are strategic assets supporting Europe's energy transition and economic growth.

However, none of this is possible without effective, modernised, future-ready port infrastructure.

We urge the European Commission to treat ports not only as logistics and trade hubs, but as strategic enablers of offshore industrial activity. Europe's marine contractors rely on ports for vessel deployment, maintenance, fuelling, and logistics – ports are where the offshore energy transition begins.

IMCA therefore recommends the Strategy address the following areas:

1. Recognising marine contracting and offshore construction as a critical sector:

Marine contractors are **central to the EU's energy, security, industrial and environmental goals**. The sector provides over **490,000 skilled jobs** and contributes **€80bn in GVA (Gross Value Added)**, with **GVA per worker more than 2.5x** the EU average.
This sector is essential to:

- offshore wind farm development, including foundation installation, turbine assembly, and maintenance;
- subsea cable laying and grid interconnection to enable large-scale renewable energy and other power transmission;
- maintenance and repair of critical underwater infrastructure such as telecoms and power cables;
- hydrocarbon systems maintenance, decommissioning and marine infrastructure repurposing to support the green transition;
- installation and maintenance of other marine renewable power generation systems (e.g. tidal turbines) and
- maritime safety and environmental protection, including biodiversity restoration projects.

We urge the European Commission to **explicitly recognise the marine contracting and offshore construction sector** within the Strategy's scope and as an integral part of the port industrial ecosystem.

2. Acknowledging the critical role of ports in offshore infrastructure delivery:

Europe's ambitious targets for offshore wind (111 GW by 2030), CCS (Carbon Capture and Storage), and interconnectivity cannot be met without well-equipped and efficiently managed ports. Marine contractors require ports that support:

- heavy-lift operations for wind turbine and platform components;
- cable logistics and spooling facilities for subsea telecoms and grid connections;

- frequent vessel turnaround and servicing;
- safe and sustainable fuel supplies, refuelling infrastructure and shore power facilities that supports fleet decarbonisation; and
- crew changes and logistics for highly skilled offshore teams.

Ports are the operational base for the EU's offshore ambitions – they are critical infrastructure for climate, energy, digital, and maritime security policy.

3. Expanding port capacity, modernising infrastructure and strategic spatial planning:

Specialist vessels used in offshore energy and digital infrastructure require:
- deep berths, heavy-duty quaysides, and large laydown areas;
- safe storage and marshalling of large structures and cabling; and
- 24/7 operational readiness for weather-dependent offshore projects.

Yet space at many European ports is constrained by legacy uses or commercial competition.

We call on the Commission to:
- support spatial planning at national and EU level to ensure sufficient port space is available for offshore construction; and
- provide funding and permitting pathways for rapid upgrades of strategic ports.

4. Supporting maritime decarbonisation: fuel availability, OPS and vessel electrification

Port infrastructures are key to enabling the greening of the marine contracting fleet. IMCA encourages the Strategy to include targeted measures that:
- deliver fuel visibility maps covering major offshore energy ports;
- coordinate port development strategies to avoid bottlenecks in major offshore energy hubs (e.g., North Sea, Baltic, Iberian Peninsula);
- ensure offshore energy hubs are equipped with adequate port infrastructure to support vessel operations;
- promote offshore recharging infrastructure at wind farms to enable vessel electrification;
- improve access to alternative fuels at ports servicing offshore energy sectors;
- support onshore power provision and vessel charging at ports to facilitate vessel electrification, this includes access to grid power and ensuring that future port power demands are clear and accounted for by national power grids; and
- enhance port electrification to facilitate vessel (and related marine systems) recharging and emissions reduction.

IMCA welcomes EU efforts to decarbonize the maritime sector, but the current regulatory landscape lacks flexibility for offshore-specific operations. The Strategy should also:
- confirm **the necessity to adjust the EU ETS and FuelEU Maritime** to reflect the unique operational realities of the offshore fleet;
- support electrification and alternative fuel adoption, including hydrogen, ammonia, and methanol, through clear and practical regulations; and
- promote investment mechanisms that accelerate the transition of marine construction fleets to low-carbon solutions.

5. Enhancing safety and skills to support a future-ready port workforce:

Marine construction projects rely on port-based personnel for logistics, coordination, fuelling, and safety. IMCA recommends:
- increased support for **maritime training programs**, including initiatives to attract new talent into offshore and subsea industries;

- further developing **safety and operational standards** in collaboration with the industry to ensure best practices in offshore energy, construction, and decommissioning; and
- recognizing **industry-led certification programs**, ensuring alignment with EU regulatory frameworks.

6. Supporting the EU defence and maritime security objectives:

IMCA supports embedding maritime security into the EU Ports Strategy. We encourage the European Commission to ensure the Strategy complements broader EU defence and security objectives, particularly in relation to:

- dual-use technologies; and
- the protection of critical infrastructure (e.g., submarine cables, pipelines, subsea and offshore structures and CCS assets).

Conclusion

IMCA strongly supports the aims of the EU Ports Strategy and stresses that Europe's ability to meet its energy security, climate, and digital goals is directly tied to the success of the offshore construction and marine contracting sector. The Strategy must recognise the critical role of this sector, prioritise investment in offshore infrastructure and port modernisation, and provide a regulatory framework that enables innovation, sustainability, and competitiveness. (To support this, IMCA has recently carried out an Economic Impact Assessment which is provided with this submission below.)

Europe's ports are no longer just gateways for trade – they are launchpads for the EU's energy, climate and security ambitions. We look forward to continued engagement with DG MOVE and other stakeholders as the Strategy develops to ensure that ports are ready for the offshore future.

Yours sincerely,

On behalf of IMCA:
Lee Billingham
Director of Strategy and Energy Transition

[Attached: Economic and social impact assessment of the European marine contracting sector]

Economic and social impact assessment of the European marine contracting sector

Executive summary produced for the

International Marine Contractors Association


Bringing
Ingenuity
to Life.

Introduction

PA Consulting was commissioned by the International Marine Contractors Association (IMCA) to conduct an economic impact study of this industry in Europe.

Our study finds that the economic contribution of the marine contracting sector to the wider European economy is highly significant.

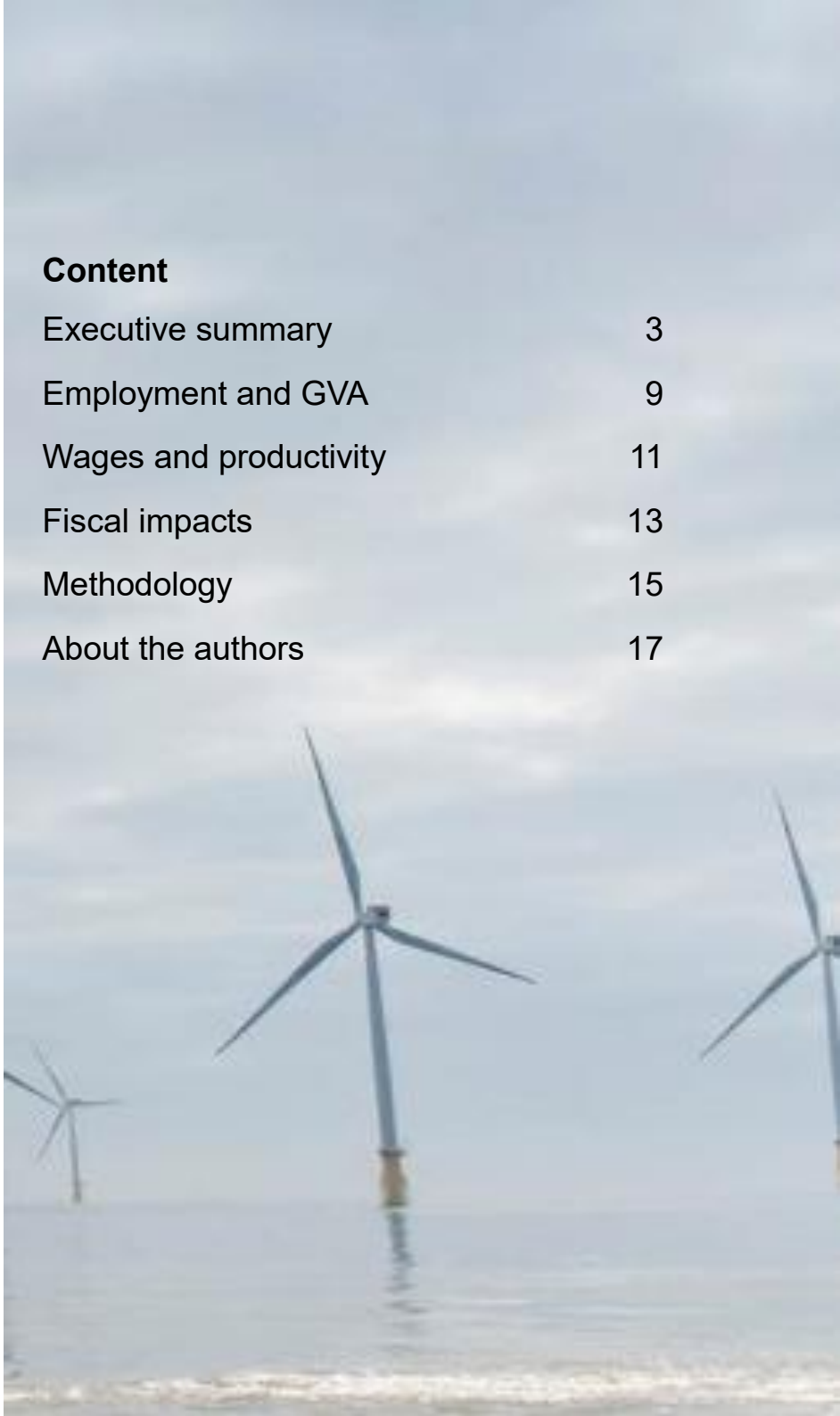
PA Consulting's economics team used standard economic impact assessment methodologies and datasets to model the jobs and Gross Value Added (GVA) associated with this sector. We found that there is a sizeable economic opportunity and investment from sustaining and growing the high-wage, high-productivity jobs, this sector provides.

In addition, the sector plays a critical role installing and maintaining offshore energy infrastructure for net zero investments, as well as telecoms cables vital for economic security in increasingly data-driven economies.

Alon Carmel

Member of PA's Management Group,
Offshore wind expert

Content



The sector is made up of >3,300 vessels operating marine-based projects including oil and gas, offshore wind, and telecoms

Europe's marine contracting industry services critical offshore infrastructure across Europe and globally, operating out of key ports across the region

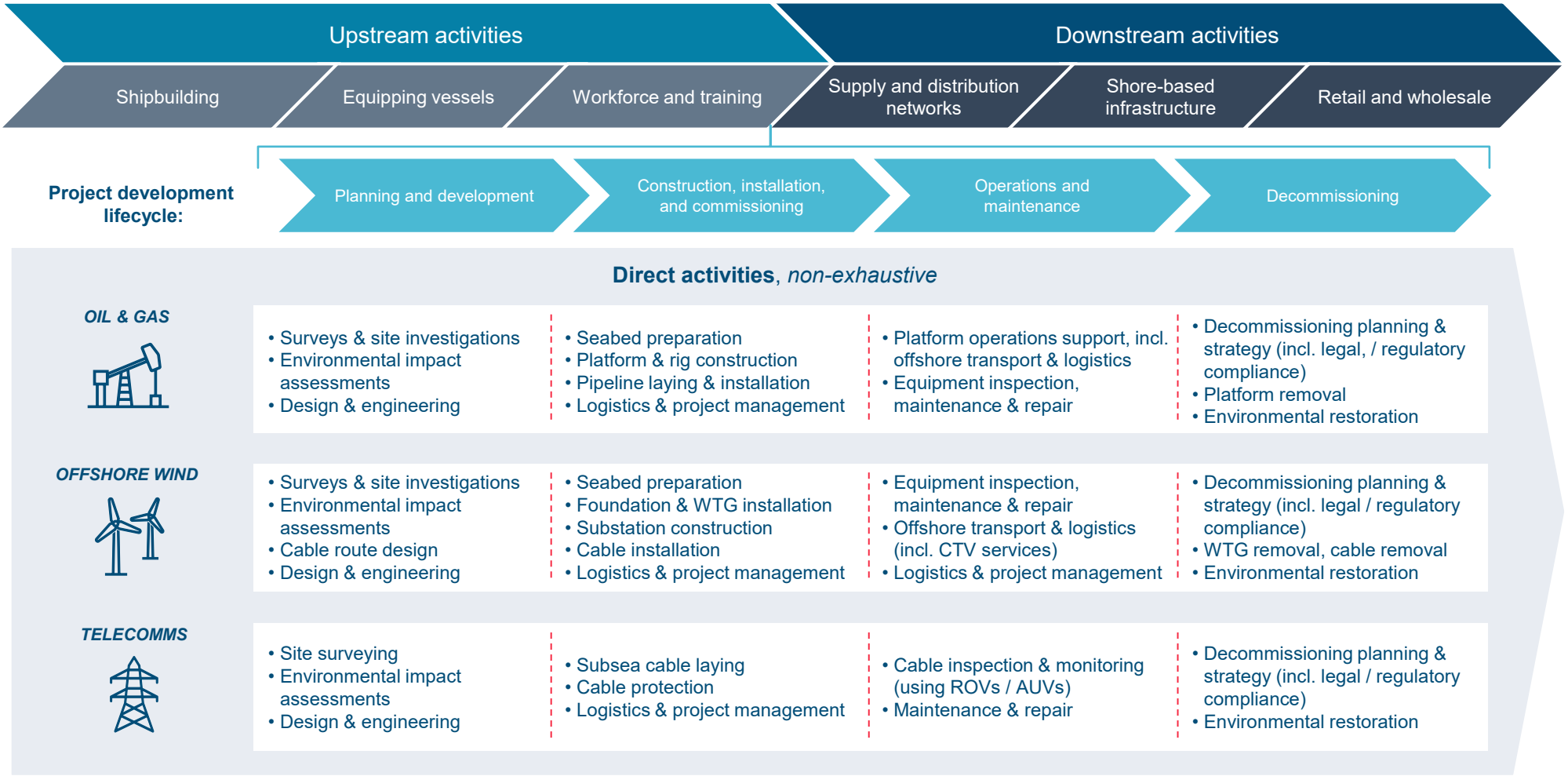
Defining the sector

PA Consulting was commissioned by the International Marine Contractors Association (IMCA) to assess the economic, environmental, and wider impact of Europe's marine contracting industry: EU-27, UK, and Norway.

Our analysis finds that the sector:

- Enables all stages of the offshore infrastructure development life-cycle – from construction to decommissioning
- Catalyses economic activity in upstream sectors such as ship-building, repair, and maintenance
- Is growing despite facing growing sources of volatility and uncertainty.

Illustration of Europe's marine contracting sector value chain



Notes: Elements of Europe's typical marine contracting sector supply chain activities and lifecycle. Sources: PA analysis

The European marine contracting services industry is a vital part of the European economy

The sector provides over 220,000 jobs and over €45bn of gross value added

How to measure economic impact

Our economic impact analysis of the offshore contracting industry has used standard economic methodologies and models to assess:

- Direct impacts: increased economic activity and jobs generated from 'direct' activities of the sector
- Indirect and induced impacts: additional economic activity and jobs in the supply chain, catalysed additional spending
- Fiscal impacts: The taxes and other fees paid by companies operating in the sector
- Productivity and growth: Comparing the average wages and productivity levels of jobs in the sector to national averages, and examining their growth potential.

The sector's economic contribution in numbers

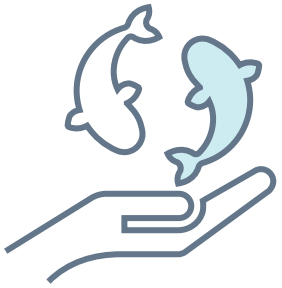
- ✓ **Employment: over 220,000 of Direct FTEs**
- ✓ Including direct, indirect, and induced impacts, this rises to over **490,000 FTEs**

- ✓ **Gross value added: over €45bn of direct GVA** this year
- ✓ Including direct, indirect, and induced impacts, this rises to over **€80bn**

- ✓ **Tax contribution: over €15bn in taxes** expected this year
- ✓ This income is vital for **funding public services** and building national infrastructure

- ✓ **High wage and high productivity jobs:** GVA per worker is 2.5x the average for the region
- ✓ Strong long-term **growth prospects** servicing offshore wind, carbon capture, usage and storage (CCUS); hydrogen; and telecoms/digital cables and platforms

Source: PA analysis, Euro amounts reported in 2023 prices unless otherwise stated



Marine contracting services deliver widespread environmental benefits

The sector is critical for advancing global decarbonisation, maritime sustainability, and the ‘blue economy’

Global decarbonisation

Marine contracting services are critical for the development, construction, operations, maintenance and decommissioning of the offshore infrastructure needed to advance the energy transition and meet global climate goals.

Maritime sustainability

Innovations in the marine services sector, such as cleaner fuel use for vessels, can be applied to other maritime activities, supporting broader decarbonisation efforts in the industry.

Contributions to the Blue Economy

Marine contracting services enable sustainable ocean use by providing the skills, equipment, and resources to monitor ecosystems, support research and conservation, and build a resilient maritime workforce.

The sector’s environmental contribution

- ✓ Provides the vessels, equipment and workforce to enable the installation of the **c.10,000-20,000 turbines**[1] required to meet European offshore wind capacity targets for net zero in 2050
- ✓ Enables the deployment of **other marine renewable energy and ocean energy** at sea (e.g. tidal stream, tidal barrage, wave)
- ✓ Enables **carbon capture and storage (CCS)** required to meet the **EU’s carbon emissions targets by 2030 and 2050**
- ✓ Provides the **platform for technical advancements** and innovations in offshore wind marine and ocean energy
- ✓ Europe is a gl**obal leader in ocean and marine energies** which by some estimates could provide 100GW by 2050 and €53bn a year[2]
- ✓ Helps support the **sustainable and equitable use of oceans** by providing the skills, equipment, and resources needed for this

Sources: 1. PA analysis, based on the number of turbines required to meet offshore wind capacity targets given current installed capacity figures and assuming 15-24MW turbines. **2.** Ocean Energy Europe

Marine services support critical infrastructure and underpin European security

The sector facilitates deployment of critical infrastructure needed in a modern world

Offshore infrastructure

Maritime contracting services are critical for the development, construction, operations, maintenance and decommissioning of offshore infrastructure needed to support an increasingly interconnected and digitalised world – including telecoms and offshore transmission.

Shore-based infrastructure

Marine services depend on shore-based refuelling, maintenance, and support, making marine contracting sector demand crucial for developing and modernising ports, harbours, and terminals.

Energy and climate security

By protecting European energy supply, interconnector, and telecoms infrastructure, the marine contracting services sector improves European security in an increasingly volatile world, making Europe more resilient to geopolitical and climate threats.

The sector's social and wider contribution

- ✓ Supports an **interconnected and digitalised world**, with submarine cables facilitating **over 99%** of international data exchange[3]
- ✓ Drives the development, expansion, and **modernisation of shore-based infrastructure** such as ports, harbours, and terminals aimed at accommodating higher trade volumes
- ✓ **Develops communities through local investment**, key as **c.40%** of the world's population lives within 100km of coast[4]
- ✓ **Helps improve European security** in an increasingly volatile world by reducing reliance on Russian energy imports and promoting connectivity between European nations

Sources: 3. International Telecommunication Union (ITU); **4.** United Nations

Economic impact assessment

Findings and methodology

The marine contracting sector in Europe is expected to deliver over 220,000 direct jobs and more than €45bn of direct GVA across Europe this year

Employment and GVA

Economic impact findings

We estimate that Europe's marine contracting sector delivers over 220,000 of direct FTEs and more than €45bn of direct GVA to the European economy.

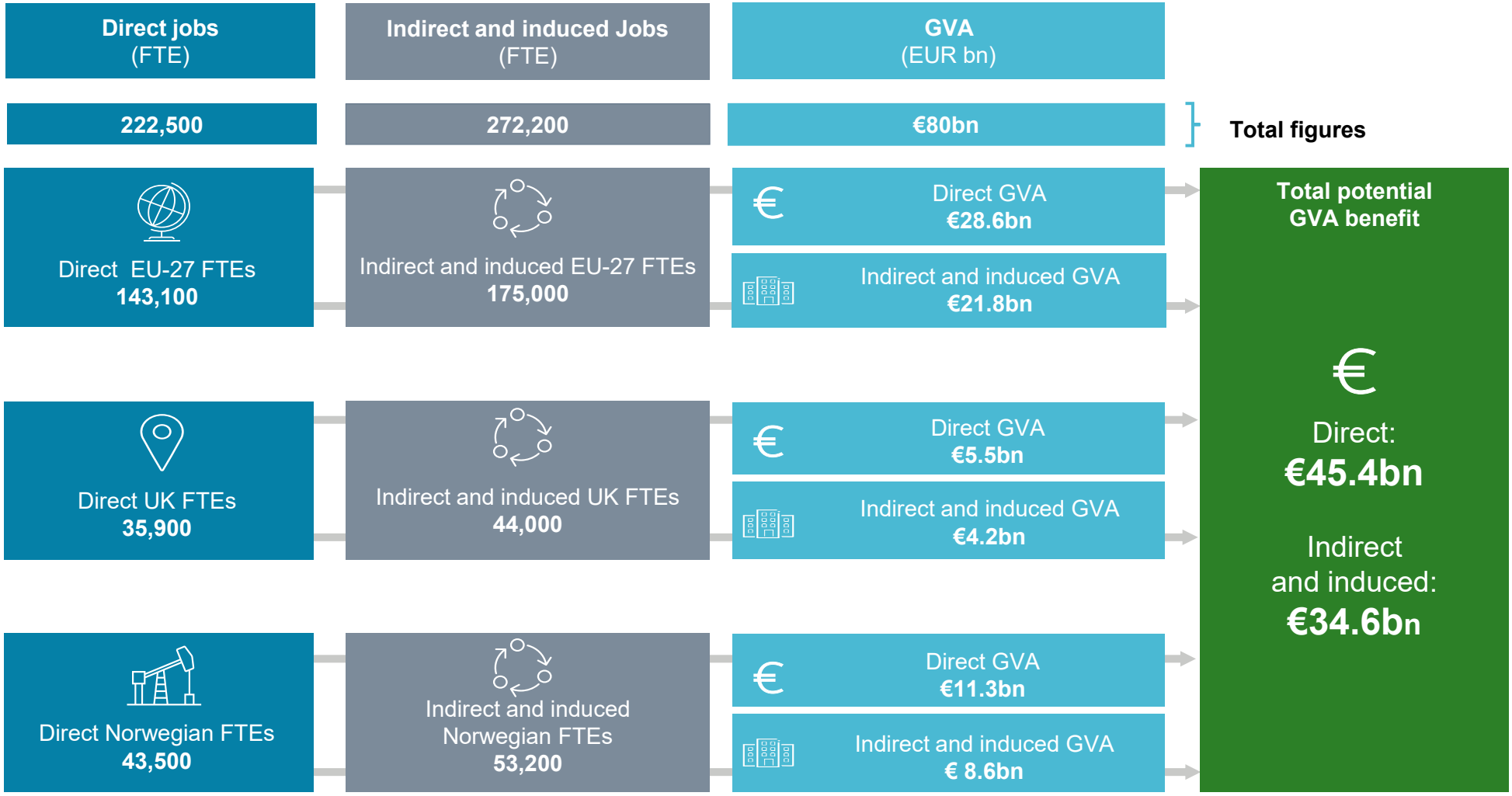
These direct impacts reflect the operations of the marine contractors themselves, typically within oil and gas and offshore wind sectors.

We estimate the sector supports over 270,000 FTEs in the supply chain and wider economy, and more than €34bn in indirect and induced GVA. This is driven by increased supply chain activity and spending from wages in the sector and its supply chain.

The biggest contribution to GVA and FTE impacts comes from the oil and gas sector, and the EU-27 experiences the greatest economic benefits, with sizeable impacts delivered by the UK and Norway's large offshore sectors.

Overview of the Marine Contracting Sector's Economic Impact

The European marine contracting sector is expected to deliver over 220,000 direct jobs and over €45bn of Direct GVA across Europe in 2025



Notes: Detailed Economic Impact Methodology is provided in Appendix 1.

The marine contracting sector is a key source of high-wage, high-productivity jobs in Europe

Wages and productivity

Key insights

The marine contracting sector is a key source of high-wage, high-productivity jobs in Europe.

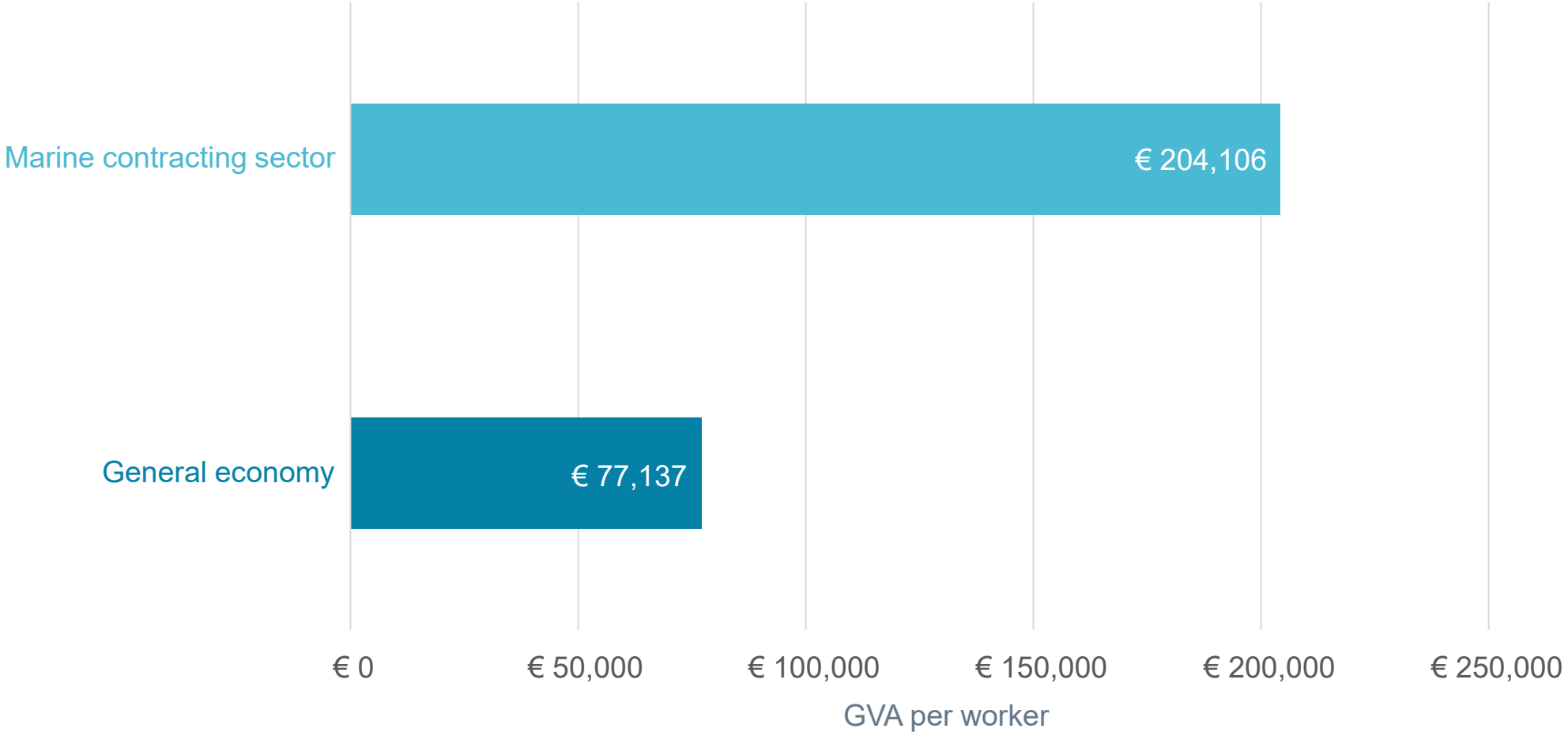
Our analysis indicates that average GVA per offshore contracting roles are over 2.5x higher than average GVA per worker in the economy of the whole – a premium of c.€126,000 per worker.

This increase reflects the higher levels of wages and productivity seen in highly-skilled offshore roles compared to national averages.

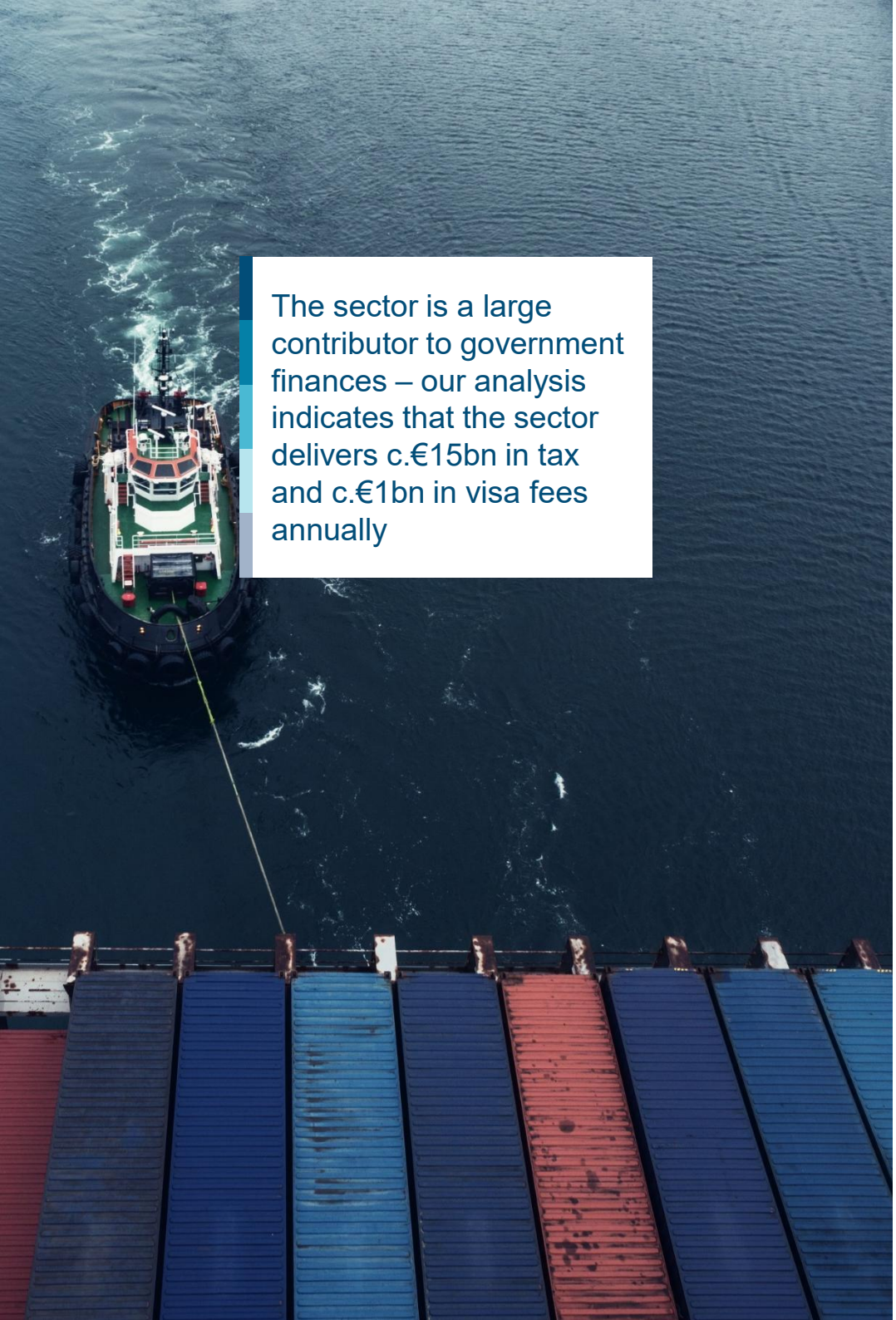
Vessels are staffed by project crews, made up of higher-skilled managerial and trade roles, with operational support from mariner crews.

The onshore workforce are typically higher-skilled individuals in strategic planning, engineering, design and corporate services.

Estimated GVA per worker in 2023 – offshore industries compared to European average



Notes: Variation in GVA per worker between the marine contracting sector and general economy across Europe (excluding UK as figures were not submitted to Eurostat), Sources: PA analysis of Eurostat data



The sector is a large contributor to government finances – our analysis indicates that the sector delivers c.€15bn in tax and c.€1bn in visa fees annually

Fiscal impacts

Key insights

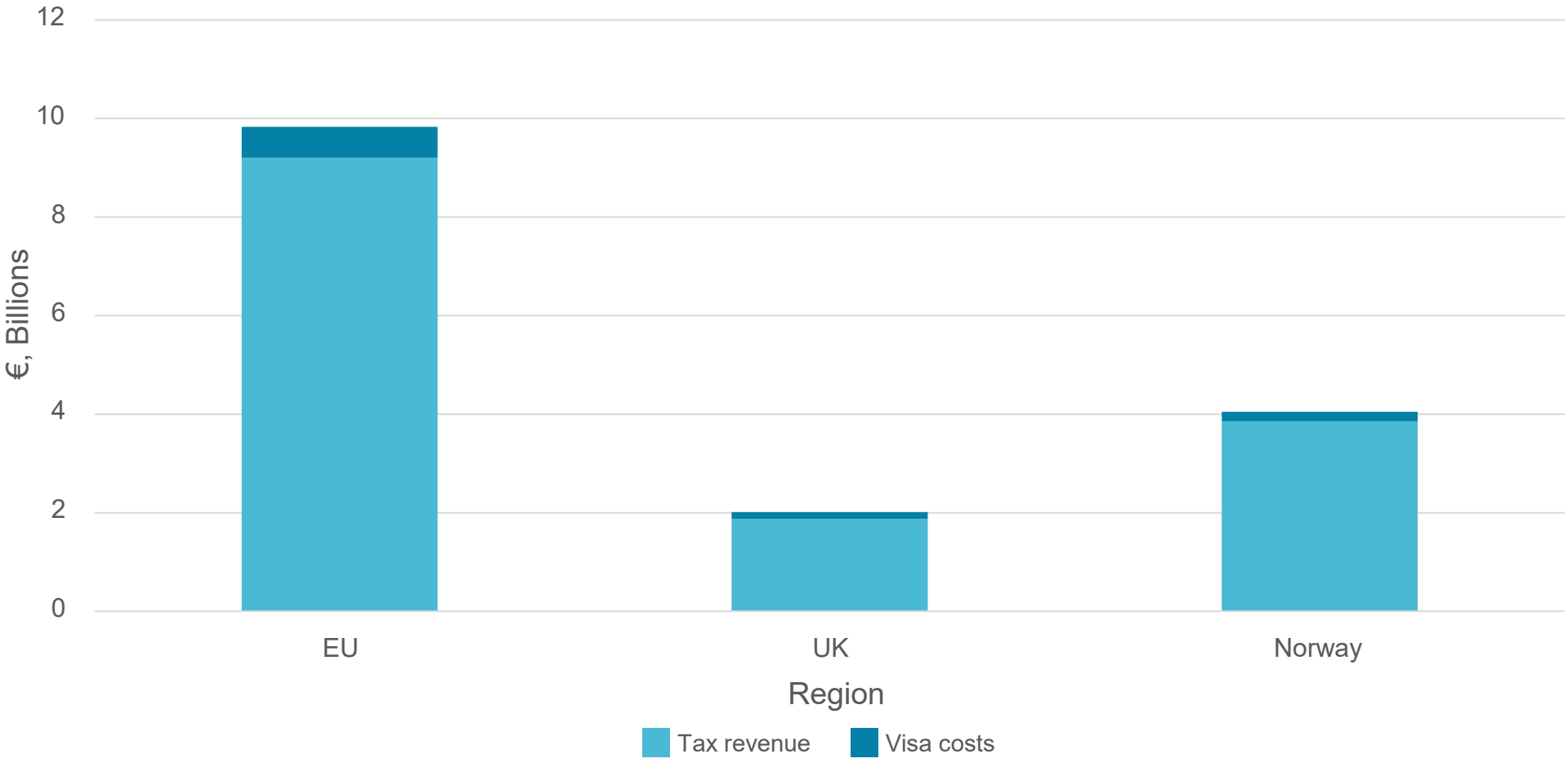
Additional GVA drives additional tax revenue in the form of income taxes, sales taxes, corporation taxes, and other tax types.

Based on strategic fiscal impact analysis, we estimate that the sector contributes c.€15bn in taxes annually. This highlights the sector's substantial role in supporting public services, infrastructure, and overall government spending.

Given the international nature of the workforce, visas are required often for a high proportion of workers onboard vessels.

This can bring in important sources of non-tax revenue for individual European countries – overall we estimate that the sector contributes >€900m in visa fees across Europe annually.

Illustrative direct tax and visa revenues – adjusted for sector tax considerations



Notes: Direct tax and visa contributions from the marine contracting sector across EU-27, UK and Norway, Sources: PA analysis of Eurostat. UK Gov, Statistisk Sentralbyra and IMCA Data

Methodology

Key aspects of our methodology

PA Economics experts have used standard economic impact methodologies and databases to calculate the jobs and GVA impact of the marine contracting industry in Europe.

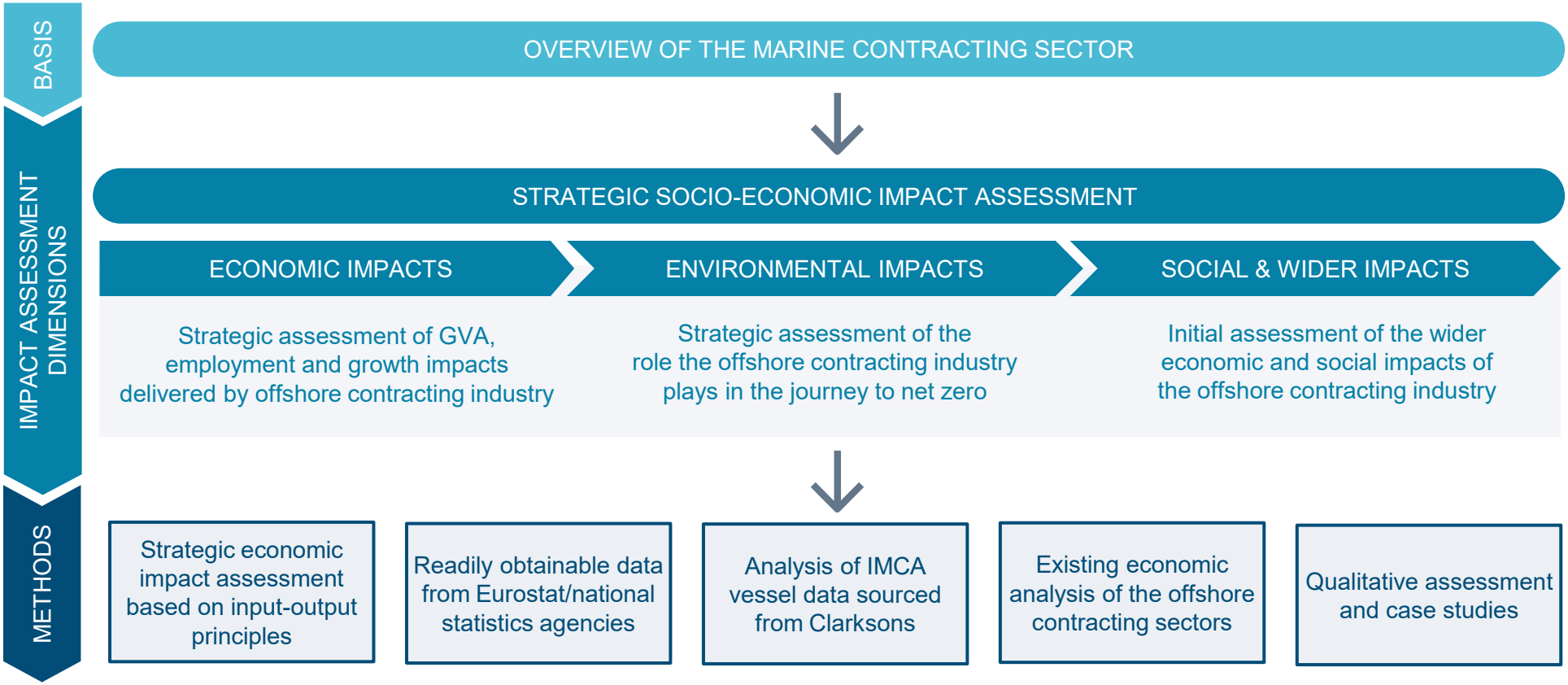
Input-output Analysis was used to assess the value generated by the European offshore contracting fleet in sectors like offshore oil and gas, wind, telecommunications, and emerging fields like CCUS.

The analysis covers direct impacts from vessel operations, indirect impacts from supply chain activity, and induced impacts from worker spending.

Long-term environmental, social, and broader impacts are assessed qualitatively.

The assessment focuses on vessels operating in early 2025, with annual impacts calculated in 2023 prices (€).

PA Consulting's approach to calculating economic impact and wider environmental and social impacts



Source: PA Strategic Socio-Economic Impact Framework

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PA Consulting's energy transition and economics experts work across the energy value chain to help our clients thrive in complex energy markets using innovation and technology.

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