



Supporting Consenting Processes for Marine Renewable Energy: International Perspectives

Lysel Garavelli, Debbie Rose, Sarah Wren,
Juan Bald, Anne Marie O'Hagan

October 2, 2025



PNNL is operated by Battelle for the U.S. Department of Energy



Today's Webinar

- All participants will be **muted** during the webinar and question period.
- After all the presentations, we will answer questions. Use the **Q&A box** to add your questions at any time.
- The **chat** can be used to contact organizers if you need help with Zoom, and we will use it to share links to resources throughout.
- The webinar will be **recorded**. The recording will be available on Tethys after the event, and the link will be sent to all registrants.
- We will share a **feedback survey** at the end.



Agenda

- **OES-Environmental updates and resources**
Lysel Garavelli and Debbie Rose,
Pacific Northwest National Laboratory, USA
- **Tidal Stream Data Transferability Matrix**
Sarah Wren, The Crown Estate, UK
- **SAFEWAVE Overview**
Juan Bald, AZTI, Spain, and Anne Marie
O'Hagan, University College Cork, Ireland
- **Q&A**



OES-Environmental

- Established by the International Energy Agency-Ocean Energy Systems in 2010
- Examines environmental effects of marine renewable energy (MRE) development to advance the industry in a responsible manner
- Led by the U.S. Department of Energy Water Power Technologies Office and implemented by Pacific Northwest National Laboratory
- Phase 5 (2024-2028): 15 countries + European Commission

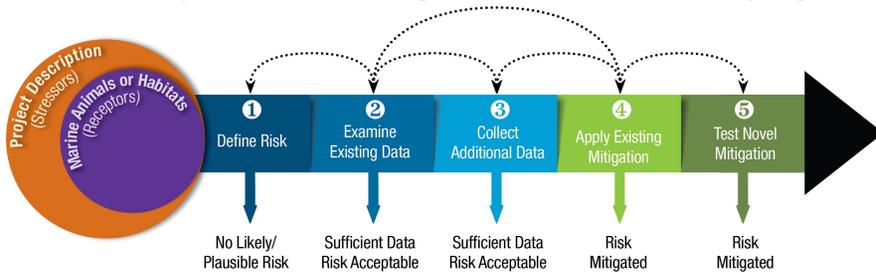


Approaches to Aid Consenting

- For certain stressor-receptor interactions, potential risks need not be fully investigated for every project (**risk retirement**)
- Consenting new MRE projects informed by what is already known (**data transferability**)
- For use during consenting processes by regulators, advisors, developers, consultants

Caveats:

- Does not replace/contradict regulatory processes
- Site-specific data may be needed for new projects



<https://tethys.pnnl.gov/risk-retirement>

STRESSOR-RECEPTOR INTERACTION	READINESS FOR RISK RETIREMENT
 Collision risk	Need more information.
 Underwater noise	Retired for small numbers of devices. May need to revisit as the industry moves to larger-scale arrays.
 Electromagnetic fields	Retired for small numbers of devices. May need to revisit as the industry moves to larger-scale arrays.
 Changes in habitat	Retired for small numbers of devices. May need to revisit as the industry moves to larger-scale arrays.
 Oceanographic systems	Retired for small numbers of devices. May need to revisit as the industry moves to larger-scale arrays.
 Entanglement	Need more information as the industry moves to larger-scale arrays.
 Displacement	Need more information as the industry moves to larger-scale arrays.

Resources to Aid Consenting

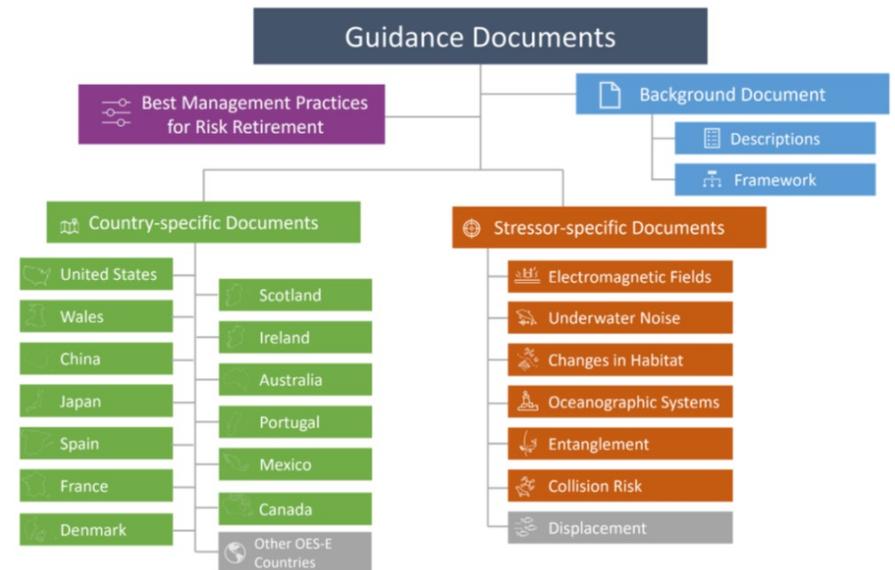
Evidence bases:

- Key research papers and monitoring reports that inform risk retirement for each stressor-receptor interaction
 - All evidence bases updated and Displacement evidence base created in 2025



Guidance documents:

- Documents tailored to regulators and advisors to bridge scientific evidence to regulatory use
 - Stressor-specific guidance documents updated in 2025

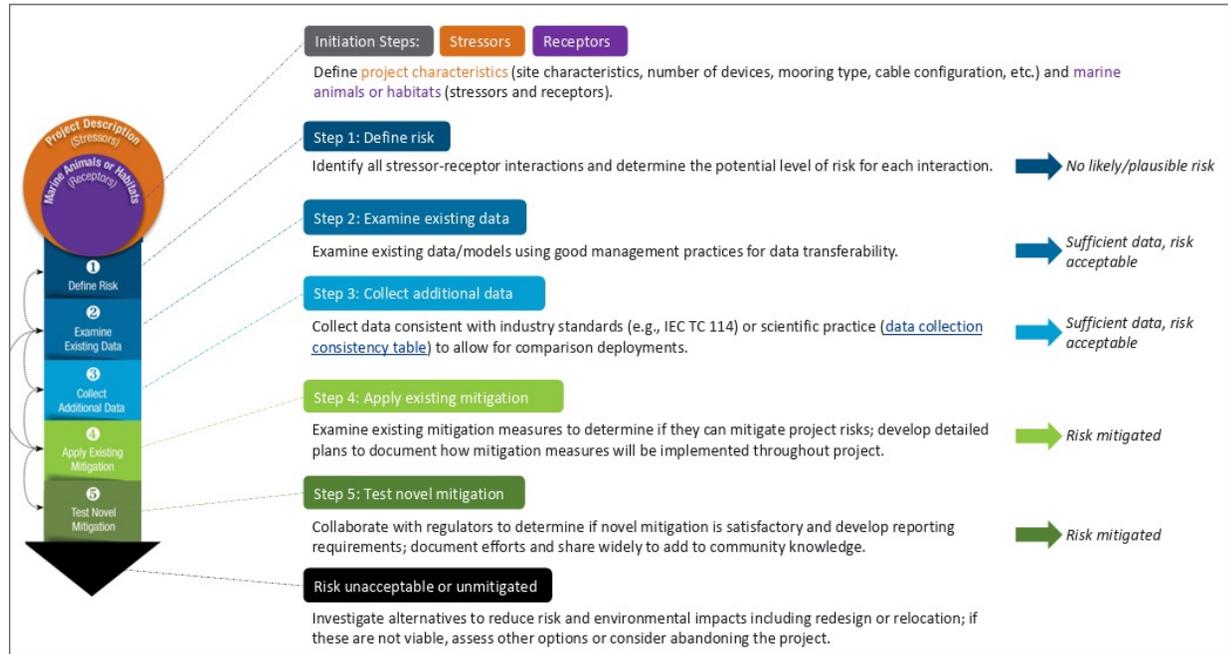


<https://tethys.pnnl.gov/risk-retirement>

Resources to Aid Consenting

Best Management Practices for Risk Retirement:

- Provide actionable steps for implementing the risk retirement process
- Support consenting dialogues with regulators
- Written in a manner that is accessible and actionable
- Reviewed by MRE developers in online expert forum in 2025



<https://tethys.pnnl.gov/publications/best-management-practices-risk-retirement>

Outreach & Engagement

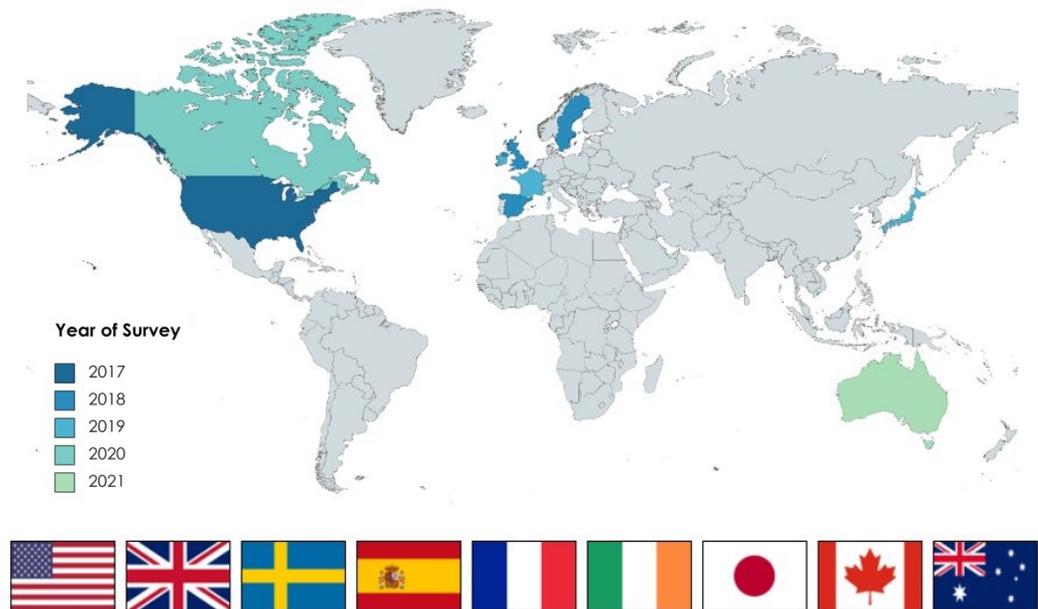
Regulator Engagement

- Engage regulators and advisors to share knowledge, understand needs, and provide resources for decision-making
- Outreach began in 2017, and has included webinars, workshops, iterative feedback

- Regulator survey

- 2017 - 2021
 - ✓ Conducted first regulator surveys in 9 countries
 - ✓ Developed data transferability (and later risk retirement) based on survey results
- 2025 – ongoing:
 - ✓ Updated regulator survey to understand changing information needs and challenges
 - ✓ Sharing in OES-Environmental countries throughout 2025-2026

2017-2021 Regulator Survey



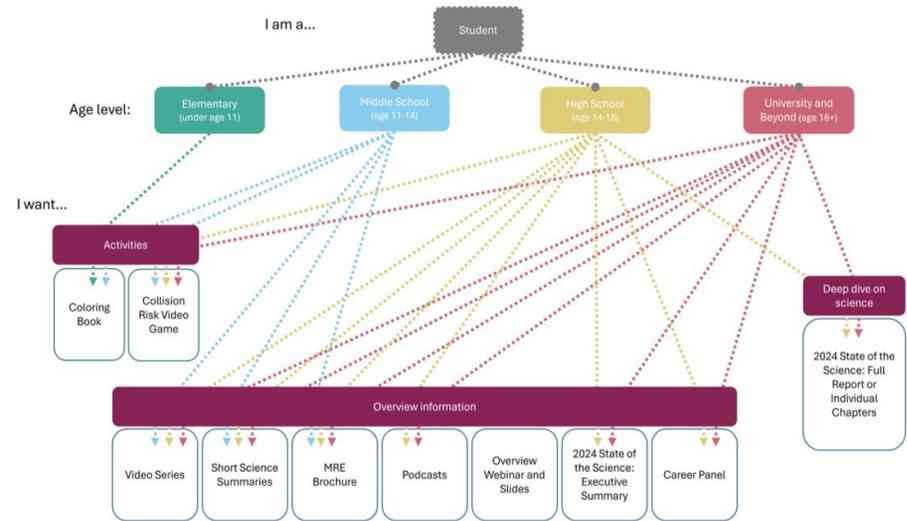
<https://tethys.pnnl.gov/regulator-surveys>

Outreach & Engagement

Educational Resources Guide:

- Interactive flowchart to help teachers and students find resources for various age groups

<https://tethys.pnnl.gov/mre-educational-resources-guide>



Tethys Stories:

- Feature news, events, research, and projects that are relevant marine renewable energy development activities around the world

<https://tethys.pnnl.gov/tethys-stories>

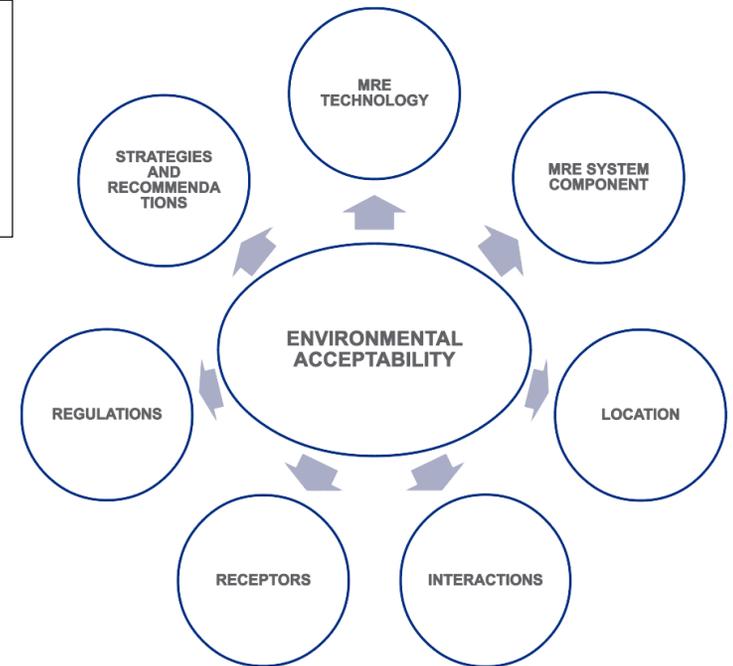


New Areas of Research (2024-2028)

❖ Environmental Acceptability

Proactive guidance that will allow for harnessing MRE resources efficiently while limiting the risks to the environment (marine animals, habitats, ecosystems), assuring compliance with environmental regulations, and promoting benefits.

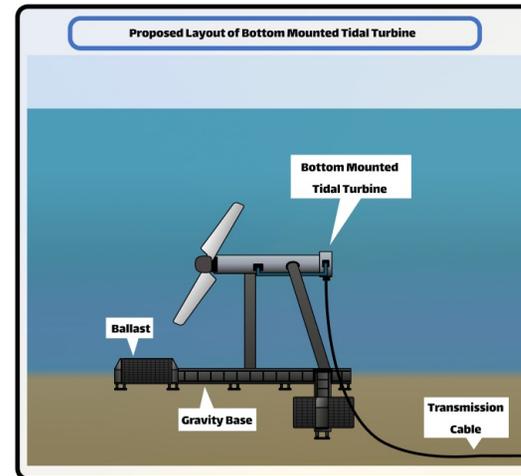
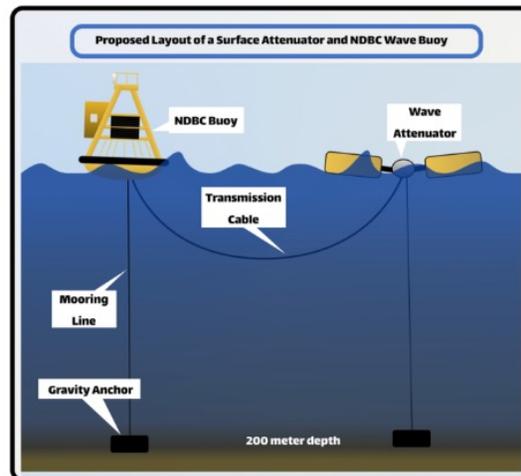
- Examine wave and tidal device types to understand specific environmental risks associated with each component
- Develop guidance for the environmental acceptability of MRE devices
- Assess potential induced benefits



New Areas of Research (2024-2028)

❖ Environmental Effects of Off-grid Applications

- Develop use cases for off-grid MRE applications (i.e., power at sea, remote communities)
- Understand how environmental effects may differ from grid-scale applications
- Develop guidance on specific environmental monitoring needs, mitigation measures, and/or consenting



New Areas of Research (2024-2028)

❖ System-wide Effects

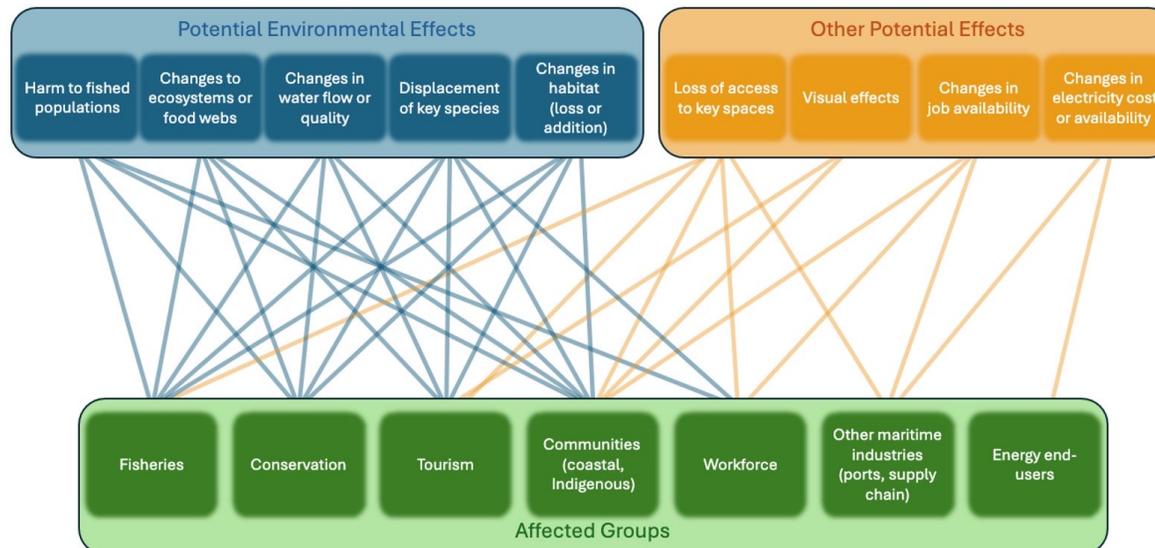
- Understand how knowledge of potential environmental effects of MRE might differ as arrays and larger projects develop in the coming year
 - Topics:
 - Scaling up to arrays (Hasselmann et al. 2023)
 - Ecosystem approach (Le Marchand et al. under review)
 - Cumulative effects
 - Tropical regions



New Areas of Research (2024-2028)

❖ Social and Economic Effects

- Coordinate an international working group to investigate the relationships between the environmental and socioeconomic effects of MRE



Progressing the MRE Industry



- Stay informed:
 - Get familiar with risk retirement, data transferability
 - Tethys Blast <https://tethys.pnnl.gov/subscribe-tethys>
- Give access to your data/information collected around devices
- Collaborate with OES-Environmental on new and emerging issues
- Collaboration between all parties:
 - Device and project developers
 - Researchers
 - Regulators and advisors
 - Students
 - Communities



Tidal stream data Transferability Matrix and Framework

The Crown Estate

Sarah Wren, Marine Evidence Manager

2nd October 2025

Agenda

- Introduction to The Crown Estate
- Importance of funding evidence
- Introduction to Data Transferability
- Previous work
- Deliverables
- Future look

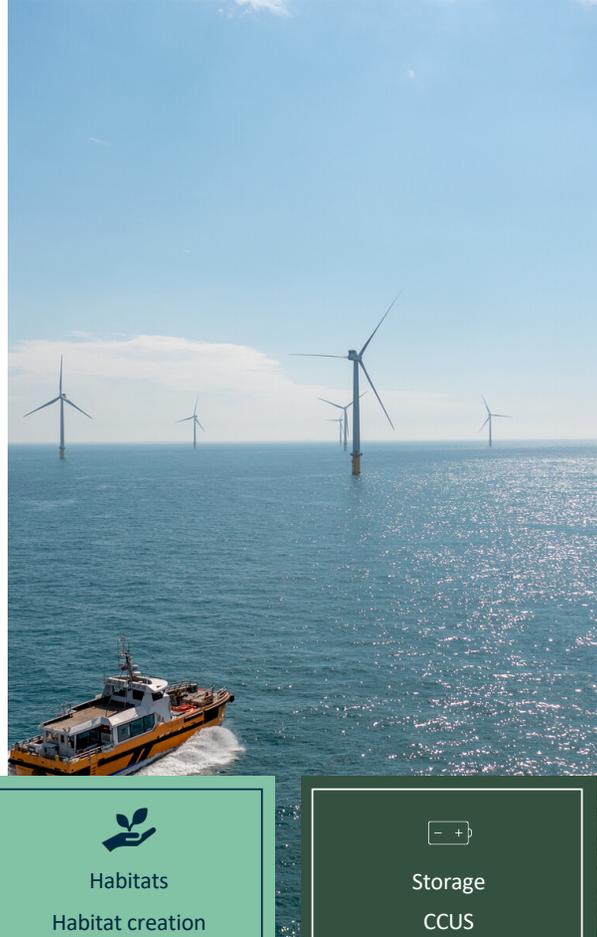


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Energy
Offshore wind
Energy conversion
Marine energy


Infrastructure
Export/Interconnectors
Pipelines
Telecoms




Habitats
Habitat creation
Biodiversity
Nature recovery

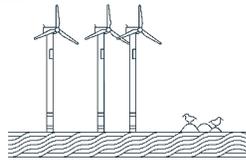

Storage
CCUS
Hydrogen
Natural gas



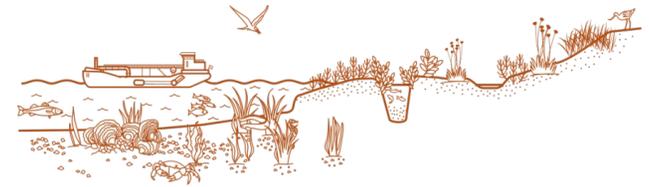

Minerals
Reclamation
Aggregate dredging
Marine mining


Coastal
Ports and harbours
Aquaculture
Leisure

Data and evidence role in supporting sustainable decision making and unlocking value from the seabed



Plan-level Habitats Regulations Assessment and Strategic Compensation



Commission and support research into restoration techniques (e.g. ReMeMaRe)

Pressure reduction activities (e.g. reducing marine litter, pollution, invasive species, etc)

Market development (e.g. Investible products, blended finance mechanisms)

Evolved leasing approach (e.g. nature inclusive design, environmental leases)



Continue our world-leading work to understand and share data and evidence on the value of the seabed and coast and activities of the sectors we manage, and continuously improve our leasing processes to minimise harm to nature



Build partnerships to protect, restore, enhance and create coastal and marine habitats at scale and take strategic seabed use decisions, through collaboration with policy-makers and investment in science, technology and business models.

The Shared Challenge: Consenting Risks and the Tidal Sector

Why Tidal Matters

Tidal stream energy offers clean, predictable, renewable energy which also benefits the grid. There is also social impact as jobs relating to tidal developments can occur in coastal communities.

Morlais: A Strategic Asset

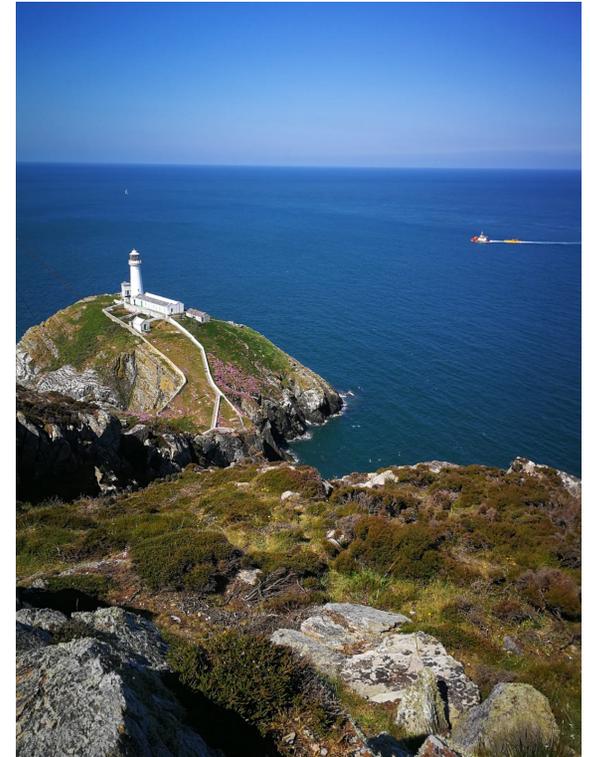
Morlais is the world's largest consented tidal stream test site with grid connection. The grid connection currently supports 18MW of capacity and is progressing toward 180MW. It has 38MW of CfD-backed sub-leases already secured.

TCE's Role in Enabling Deployment

TCE has invested £2.6M in the Marine Characterisation Research Project (MCRP) to enable safe, phased turbine deployment at Morlais and unlock broader sector growth.

Driving Sector Ambition

TCE also co-funds the Marine Energy Taskforce, which is developing a roadmap to deliver 1GW of tidal stream capacity by 2035.



© MCRP

Tidal Stream Data Transferability Project

- Provide a data and evidence summary of tidal stream research to date
- Provide a structured way to assess where environmental data can be reused across different projects
- Develop a framework and matrix that allows for a nuanced, evidenced based assessment of data
- Streamline the consenting process and accelerate deployment

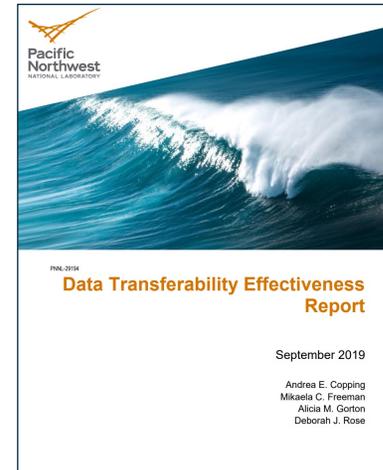


Key Aspects of the Project:

- Reduce costs and increase efficiency
- Improve informed decision making
- Streamline decision making
- Focus on key evidence gaps
- Support industry growth
- Enhance data management
- Highlight importance of collaboration and best practice

How we got here...

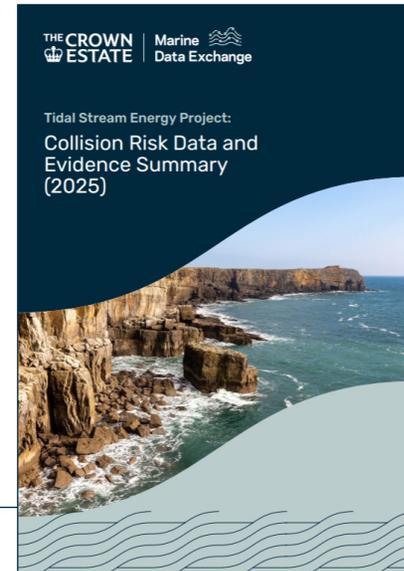
- Reviewed data evidence collected at Tidal Stream sites to produce a Data Summary Report
- Reviewed previous work in data transferability for offshore renewables
- Ensured no duplication of effort to create something useful for regulators and developers
- Developed a framework and matrix to help inform guidance or matrix principals



Process or Measurement Tool	Reporting Unit	Analysis or Interpretation
<ul style="list-style-type: none"> • Active acoustic; only • Active acoustic + video • Other 	<ul style="list-style-type: none"> • Number of visible targets in field of view • Number of collisions 	Number of collisions or close interactions of animals with turbines to validate collision risk models
<ul style="list-style-type: none"> • Fixed or floating hydrophones • Methodologies provided by IEC 62660-40 	Amplitude: <ul style="list-style-type: none"> • dB re 1 µPa Frequency: <ul style="list-style-type: none"> • Broadband • Specific frequencies 	Sound subjects compared to regulatory action levels. Generally reported as broadband noise.
<ul style="list-style-type: none"> • Cable (shaded or unshaded) • Other 	<ul style="list-style-type: none"> • AC or DC • Voltage • Amplitude 	Measured EMF levels to validate existing EMF models around cables
<ul style="list-style-type: none"> • Underwater mapping with sonar video • Habitat characterization from mapping existing maps 	<ul style="list-style-type: none"> • Area of habitat interest, specific for each habitat type 	Compare potential changes in habitat to maps of rare and important habitats to determine if they are likely to be harmed.
Population estimates by: <ul style="list-style-type: none"> • Human observers • Passive or active acoustic monitoring • Video 	<ul style="list-style-type: none"> • Population estimates for species under special protection 	<ul style="list-style-type: none"> • Validation of population models • Estimates of jeopardy • Loss of spaces for vulnerable populations
<ul style="list-style-type: none"> • Numerical modelling, with or without field data validation 	<ul style="list-style-type: none"> • No units. • Indication of data sets used for validation, if any. 	data collected around arrays to validate models.

Monitoring Methods/Techniques:

- Reviewed data collection methodologies
- Highlighted existing standards for [sound] methods, or do we need to produce one
- What's worked/ has not
 - E.g. X surveying, Y standard needs to be made.



Report aims and objectives



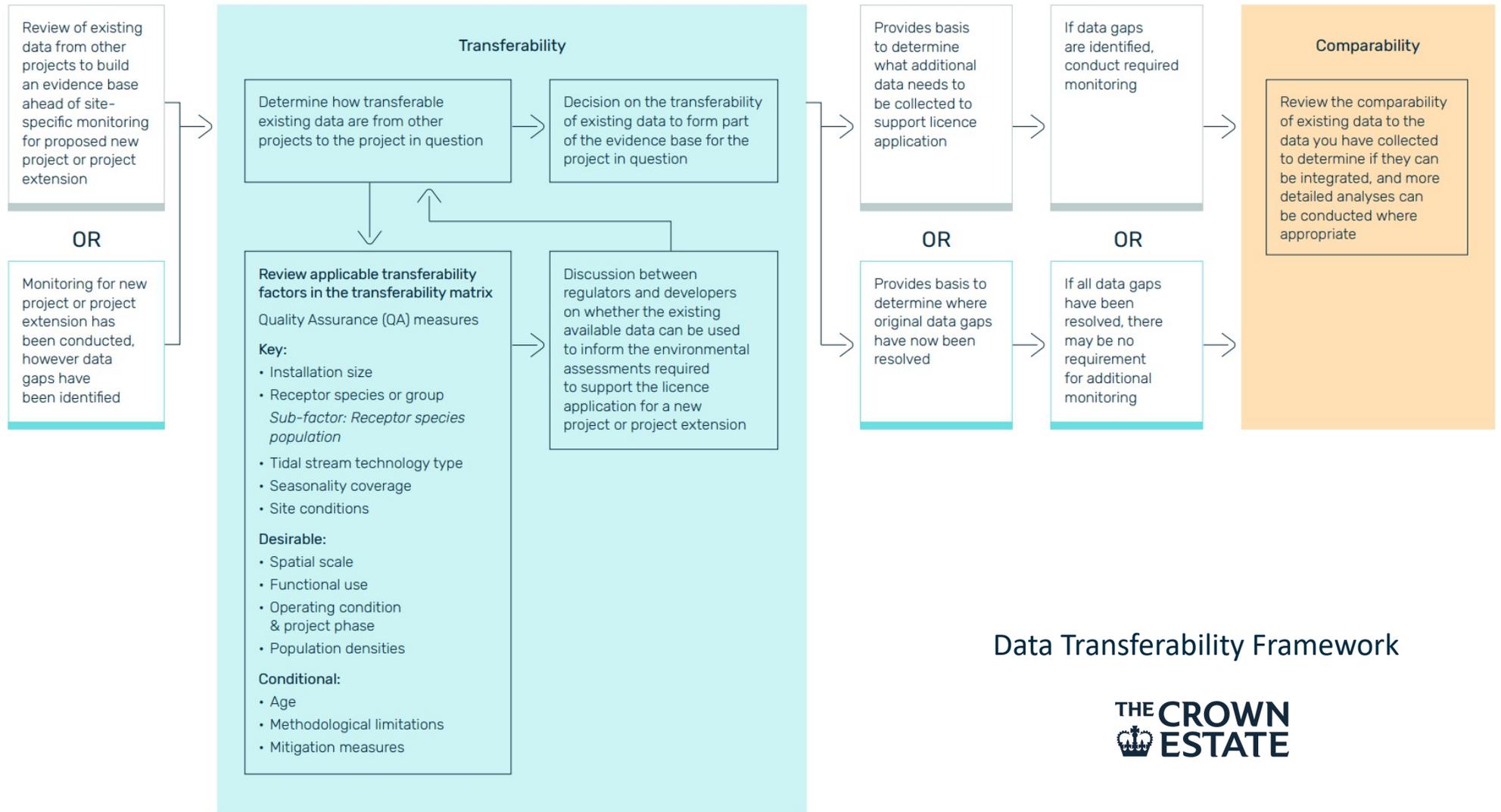
The aim of this evidence project is to summarise data collected to date on consented (pre-construction), operational, or decommissioned tidal stream energy projects in the UK and worldwide, to assess the conclusions regarding their impacts on marine species, particularly marine mammals as to date, they have been a key consenting concern in the UK.

Its purpose is to provide an insight into project impacts and outcomes, and how those conclusions can inform future tidal stream energy developments in the UK. Publicly available construction and post-construction data, including from The Crown Estate's Marine Data Exchange (MDE), are the focus for this project. A primary objective of this report has been to assess monitoring methods used at tidal stream sites, with a particular focus on impact monitoring techniques. Marine mammal surveys involving porpoised (seal) telemetry, passive acoustic monitoring, underwater video footage, active sonar, and visual surveys, as well as sound measurements to assess underwater noise levels at the turbine site both during construction and in operation, are the types of reports selected to feed into the data summary. This review focuses on four key tidal stream energy projects in the UK before briefly summarising the progress that has taken place in this sector elsewhere in the world.

The objectives of the report are to:

- Review different monitoring and modelling techniques used at tidal stream sites to understand key impacts and uncertainties associated with devices and scaling up of arrays.
- Review monitoring data from tidal stream energy data held on the MDE.
- Identify and review current monitoring data from existing tidal stream energy projects in the UK.
- Summarise tidal stream energy development that has taken place outside the UK.
- Assess different monitoring and modelling techniques used at tidal stream sites to better understand the evidence base relating to collision risk and possible displacement, while highlighting key limitations and caveats associated with the techniques.
- Set the stage for our next phase, the creation of the data transferability matrix and framework, which will be published on the Marine Data Exchange mid-late 2025.

Tidal Stream Energy Project: Collision Risk Data and Evidence Summary (2025)



Data Transferability Framework

Data Transferability Matrix: Evaluating the transferability of marine mammal impact data from tidal stream energy projects

Transferability Factors		Applicable to Post-installation Data	Applicable to Baseline Data	Factor description	Level of Transferability		
					H	M	L
Quality Assurance (QA) Measures		Y	Y	Data that is more consistent and has undergone quality checking will have a greater transferability and will be more useful for applying to future projects. If data has not undergone QA, the data may have the potential to be relevant, however QA would need to be undertaken to enable its consideration. This factor is needed for successful transfer of data between projects to take place.	Data is consistent with QA measures stated		Data is inconsistent, and QA not conducted or QA information unavailable
Key	Installation size	Y		Data for the same or similar installation size class will have a greater transferability. Size classes are a single device, a small array (2 to 6 devices), a medium array (7 to 9 devices) and a larger array (10 to 30 devices).	Installation size is the same e.g. both projects small arrays	Installation size is one size class different e.g. a small array and a medium array	Installation size is more than two size classes apart e.g. a single device and a large array
	Receptor species or group	Y	Y	Data for the same receptor species or group will have a greater transferability. The three marine mammal groups considered within the transferability matrix are seals, toothed cetaceans, and baleen cetaceans. The same receptor group is important when comparing data between the two projects, but the species might differ. Examples of different species include harbour seal and grey seal. Examples of different groups include baleen cetaceans and seals.	Receptor species is the same	Receptor group is the same	Both receptor species and group are not the same
	Sub-factor: Receptor species population	Y	Y	<i>It is important to consider the specific population when comparing the same species, as they could be a resident population which occupy a given geographic area over a long period of time, or a population that use the area while in transit.</i>	Species is the same population	Species is a different population	
	Tidal stream technology type	Y		Data for a device with same or similar technological specifications will have a greater transferability.	Device specification is the same	Same group of tidal stream generators	Different group of tidal stream generators
	Seasonality coverage	Y	Y	Data fully covering seasonality will have a greater transferability. Seasonal species may need longer monitoring timeframes to collect sufficient data for assessment.	Data covers all seasonal cycles	Data has partial seasonal coverage	Data covers only one seasonal/behavioural period
	Site conditions	Y	Y	Data that is from sites with similar geography, hydrodynamics, and oceanographic conditions will have a greater transferability. Considerations include seabed type, seabed depth (bathymetry), and current speeds. Channels between islands and more open areas of water may be used differently by marine animals. It should also be considered that evidence from similar geographic regional areas are likely to be more transferable than evidence from distinctly different regions.	Site conditions are the same	Site conditions are similar	Site conditions are dissimilar
Desirable	Spatial scale	Y		Data that covers all three spatial scales will have a greater transferability than data that only covers one spatial scale. Near field monitoring around the tidal device will provide data on device interactions whereas larger scale data collection can provide wider disturbance or barrier effects. Levels of spatial coverage for monitoring can be defined as macro, meso, and micro.	Data covers all three spatial levels (macro, meso, micro)	Data covers two spatial levels	Data covers one spatial level
	Functional use	Y	Y	Data is likely to be more transferable between areas with more similar functional use by the receptor species rather than one area being a low use area and the other of important functional value. This factor should be assessed for each receptor species considered.	Functional use of the habitat is the similar (e.g. both sites are functionally important areas)		Functional use of the habitat is dissimilar (e.g. low use area vs functionally important area)
	Operating condition & project phase	Y		Data that have been collected across all possible operating conditions and throughout different phases of a project's lifecycle will provide a more comprehensive and valuable dataset and are therefore considered to have a higher transferability. If turbines are not operational at particular times, such as no nighttime operation, this limits the usefulness of data collected.	Data covers all operating conditions	Data covers some operating conditions	Data covers one operating condition
	Population densities	Y	Y	Data from sites with similar species population densities will have a greater transferability. Marine mammals can be found in high abundances in some sites, and low in others.	Population density is similar		Population density is dissimilar
Conditional	Age	Y	Y	Data that is more recently collected will have a greater transferability, when considering data at the same project site. Age of data may be more or less relevant based on the amount of data available at the site. Data transfer between projects would be suitable for 3 to 5 years as species diversity and ecology at a project area are unlikely to change in the short term. However, it is recognised that this may not always be possible, and should be assessed on a case-by-case basis.	Data is < 5 years old	Data is 5 to 10 years old	Data is > 10 years old
	Mitigation measures	Y		Data collected where less mitigation measures are in place will have a greater transferability. For example, if the turbine is switched off when marine animals are detected, data on collision risk is less valuable. It is important to note that data that includes knowledge and/or clarity around any mitigation employed and how that impacts the findings will be more useful. The impact of this factor on transferability is dependent on the spatial scale of data (e.g. micro scale collision risk data is most impacted by the shutdown procedure).	No mitigation measures are employed to deter animals from the turbine	Mitigation measures are employed to deter animals during construction/operation of turbine	Mitigation measure of switching the turbine off when marine animals are detected
	Methodological limitations	Y	Y	Data that has fewer methodological limitations associated with its collection will have a greater transferability. Techniques to reduce limitations of the data collection method could make the data more transferable (e.g. measures to reduce biofouling).	A limited number of methodological limitations	Some methodological limitations	A lot of methodological limitations

TRANSFERABILITY FACTOR TYPES

- **Key:** These factors are key in the transferability process, and should be considered of high importance when applying the matrix.
- **Desirable:** These factors are important and should be considered, however may be of less importance depending on the project location and/or receptor species.
- **Conditional:** These factors only need to be considered if applicable to the project and/or data in question.

Road to Success...



Continue data
sharing



Continue sharing
lessons from projects
globally



Continue collaborative
discussions between both
developer and regulator



Test, adapt and use the
framework and matrix

Next Steps...

Call to Action:

- Explore the framework
- Consider local adaptation
- Engage with the data
- Join the conversation

The Crown Estates Next Steps:

- The Marine Energy Taskforce will provide recommendations moving forward
- Further engagement in other forums
- Convening experts on collision risk models



Thanks for listening

The Crown Estate are grateful for **Ceri Seaton, Ceri Morris, Tom Stringell, Holly Dunn, Jasmine Sharp** and **Leonie Richardson** from Natural Resources Wales for their valuable input and feedback throughout the project. The Crown Estate would also like to thank those at the Pacific Northwest National Laboratory, United State Department of Energy, for sharing their knowledge and feedback throughout the project's delivery period, in particular **Lenaïg Hemery, Mikaela Freeman, and Lysel Garavelli**.

We would also like to thank all the industry specialists and regulators who took the time to provide input, to carefully review information and/or to meet with The Crown Estate to discuss the projects outputs.

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Supporting Consenting Processes for Marine Renewable Energy: International Perspectives

Risk Based Approach

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Anne Marie O'Hagan (UCC, a.ohagan@ucc.ie)

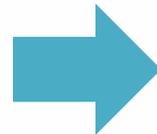


October 02, 2025

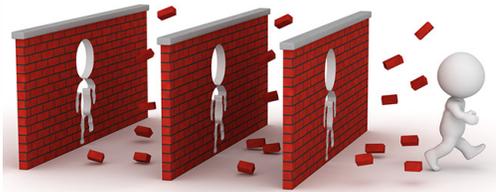


This Project is co-funded by the European Climate, Infrastructure and Environment Executive Agency (CINEA)





SafeWAVE project was co-funded by the European Climate, Infrastructure and Environment Executive Agency (CINEA)



While the technological development of devices is growing, there are some **non-technological barriers** that could hinder the future development of WE in EU:

1. The environmental **risk and uncertainty about the potential environmental impacts** of WE developments.
2. The need of a **MSP approach** to overcome the potential competition and conflicts between WE and other marine users.
3. The complex and long **consenting processes**.
4. The opposition among **host communities** of future WE deployments.



The MAIN OBJECTIVE of the SafeWAVE project is to **overcome these non-technological barriers through 3 strategies**

1. **Environmental Research Demonstration Strategy**
2. **Consenting and Planning Strategy**
3. **Public Education and Engagement Strategy**



ENVIRONMENTAL RESEARCH DEMONSTRATION STRATEGY based on the collection, processing, modelling, analysis and sharing of environmental data collected in WE sites from different European countries where WECs are currently operating (Mutriku power plant and BIMEP in Spain, Aguçadoura in Portugal and SEMREV in France).



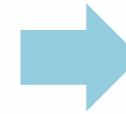
Monitoring:

- (i) Underwater noise
- (ii) Seafloor Integrity
- (iii) EMF



Modelization:

- (i) Underwater noise
- (ii) Marine dynamics
- (iii) EMF



Sharing data:



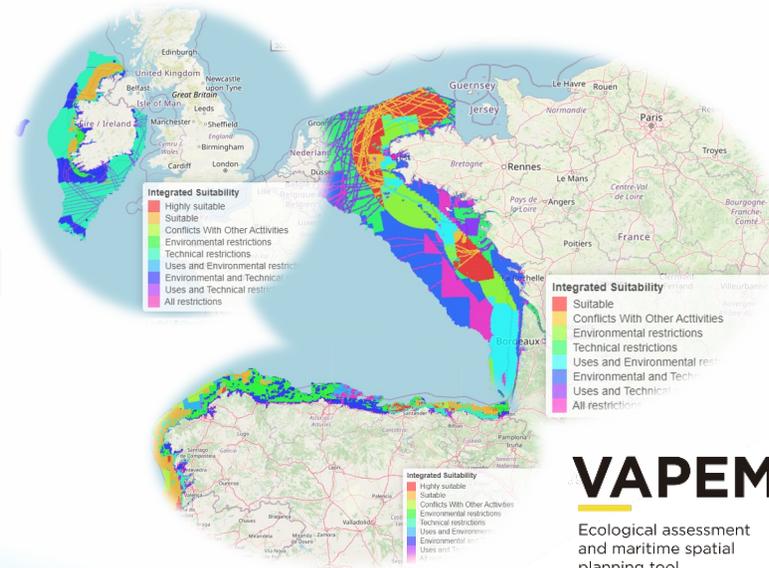
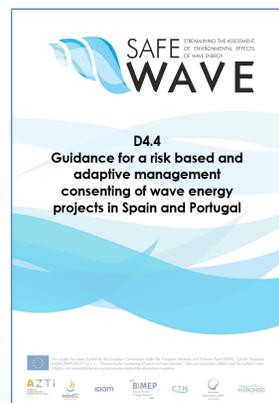
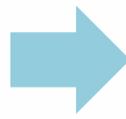


PUBLIC EDUCATION AND ENGAGEMENT STRATEGY to work collaboratively with coastal communities in France, Ireland, Portugal and Spain, to co-develop and demonstrate a framework for education and public engagement (EPE) of MRE.

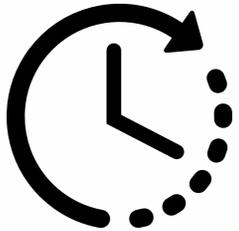




CONSENTING AND PLANNING STRATEGY through providing **guidance** to ocean energy developers and to public authorities tasked with consenting and licensing of WE projects in France and Ireland and the application of the **MSP decision support tool** developed for Spain and Portugal in the framework of the WESE project.



Risk Based Approaches and Wave Energy



Consenting procedures for Wave Energy Converters are often long, **time-consuming processes**, demanding a lot of **time and data**. This is **delaying** the testing and deployment of novel WECs



Due to uncertainty around environmental impacts, an **Adaptive Management** approach (learning by doing) is needed that allows **progress** to be made faster but in a robust way that **protects the environment**



Much research exists into Risk-based Approaches, but these are **complex, multiple approaches** have been developed and are often embedded in scientific literature. This means they **aren't accessible** to non-scientific communities

Embedding a Risk Based Approach in Marine Renewable Energy Consenting Processes

WHY use a Risk-based Approach?



Can **speed up** decision making



Can work in **data-poor** situations



Suitable for different situations – part of an **Adaptive Management** process



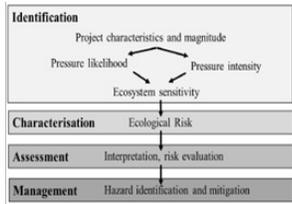
Provides a **clear process** to follow and track

Consenting processes represent a **NON-TECHNOLOGICAL BARRIER** to progress in Wave Energy development

Analysing existing Risk-based Approaches

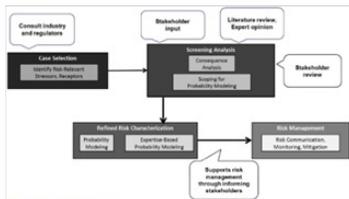


Finding **commonalities** and **differences** between the existing Risk-based approach (alluvial diagram)



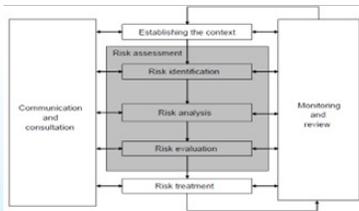
ERA Framework

Galparsoro et al., 2021



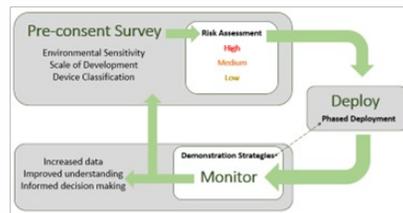
ERES Framework

Copping et al., 2015



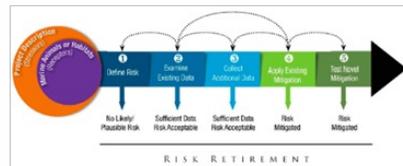
ISO Standards

ISO, 2009



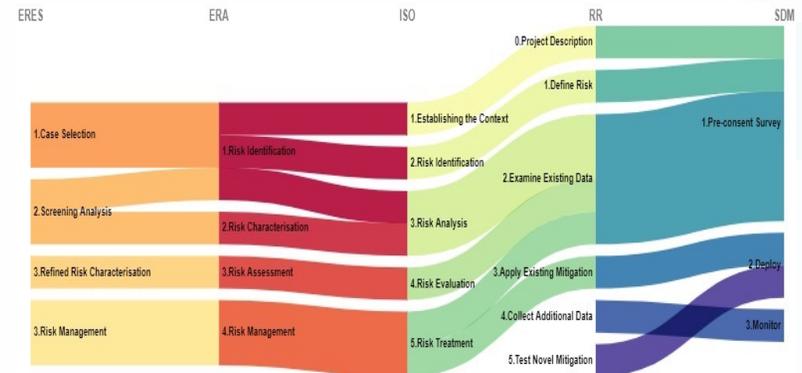
Survey-Deploy-Monitor

Marine Scotland, 2016



Risk Retirement

Copping et al., 2020

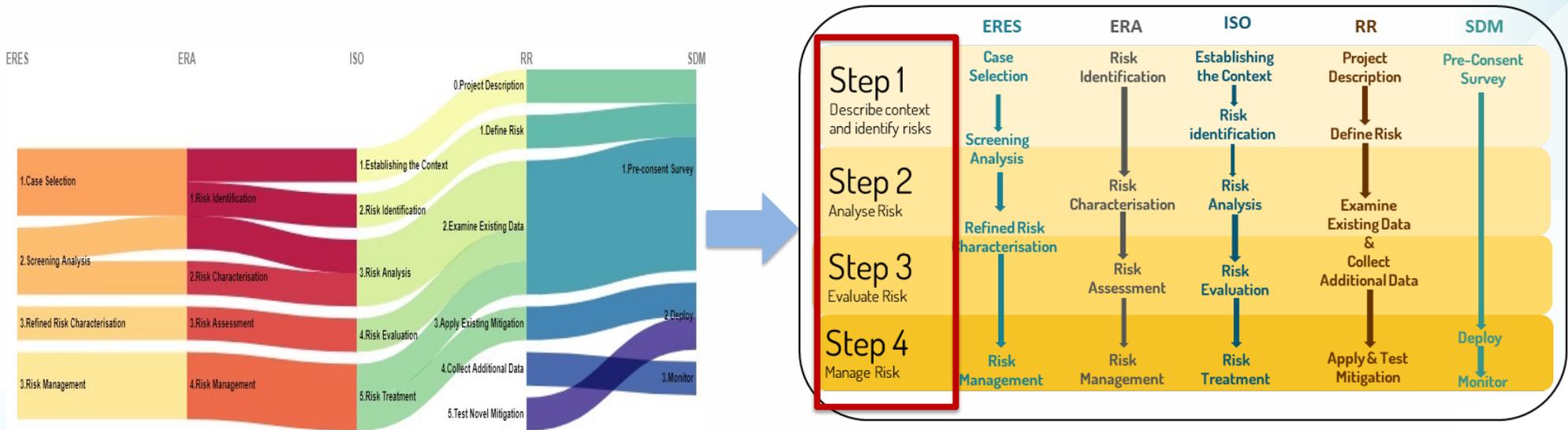


See SafeWAVE Deliverable 5.2

Existing Risk-based Approaches



Creating one graphic to show the **relationship** between all the different approaches



 See SafeWAVE Deliverable 5.2

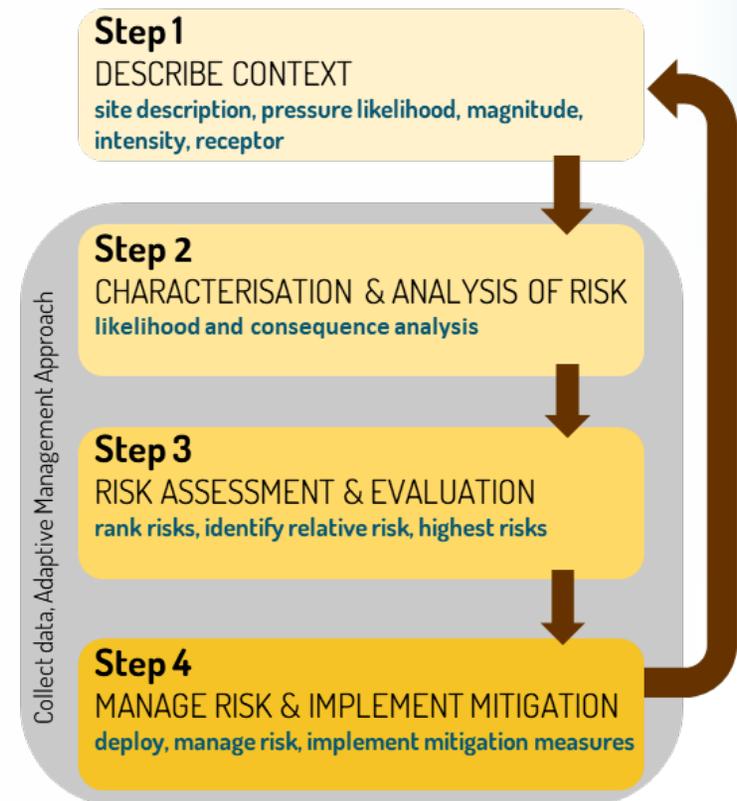
Existing Risk-based Approaches



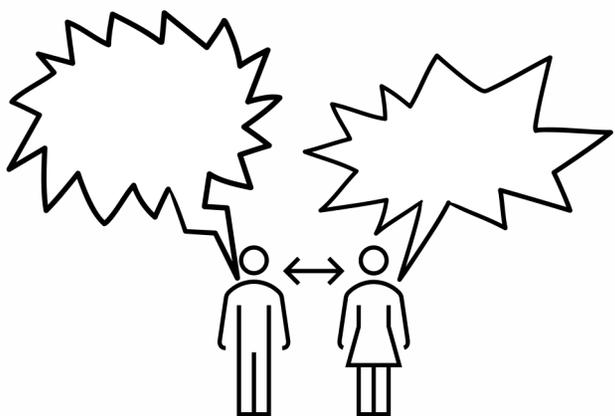
Creating a simple step-wise approach that is USER-FRIENDLY for wider use



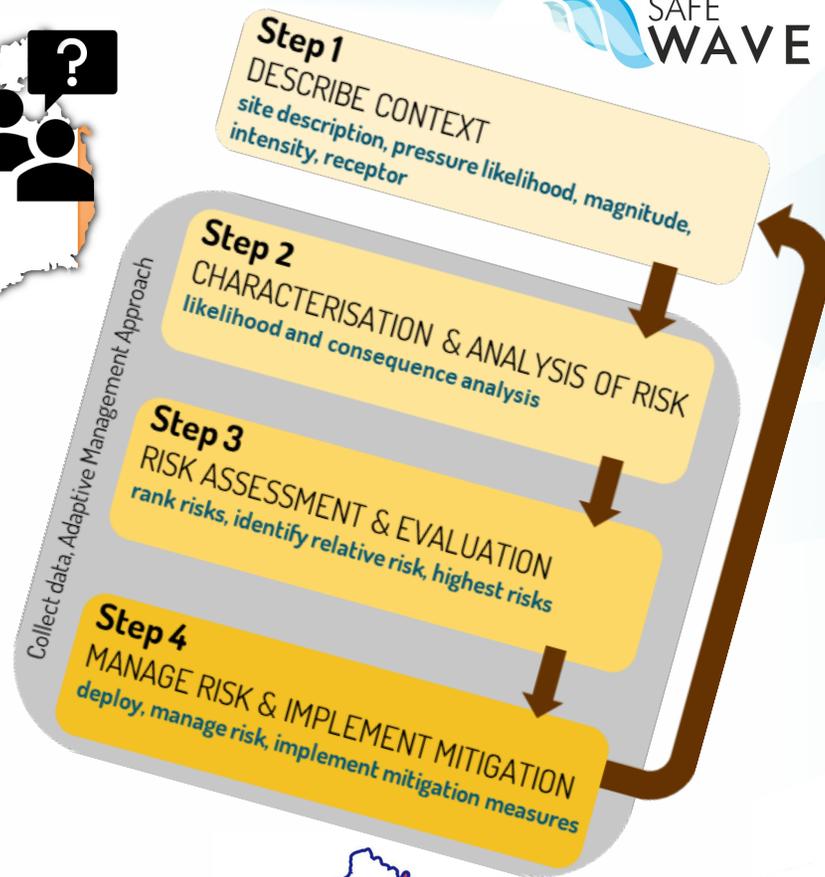
 See SafeWAVE Deliverable 5.3



FEASIBILITY OF RISK-BASED APPROACHES?



Meetings and Workshops with **regulators** to determine **operational feasibility** of RBA



FEASIBILITY OF RISK-BASED APPROACHES?



Questions

1. Have you encountered risk-based approaches in your work?
2. Have you used (RBAs) in any Offshore Renewable Energy projects to date or do you plan to?
3. Which RBAs have you used, why? What worked and what did not?
4. Would you use RBAs again or would you like to see wider uptake?
5. Which environmental inputs would you consider to be most 'uncertain'?
6. If the use of RBAs was successfully streamlined and embedded in the processes of other countries, would this increase the likelihood of their use in your country?
7. Would a worked example of this process make it more understandable and assist in its future use?

Conclusions and future work



1. None of the regulators or developers asked felt that they were using a formalised RBA in their work at present, but felt that they were **using risk concepts in an informal way**
2. Any incorporation of RBAs **must** take note of existing processes so as not to increase workload and complexity
3. There was a feeling that **direct evidence** of RBAs in action would be welcome (e.g. from RBAs in action in other countries or through worked examples) before regulators, developers and consultants feel confident that they can fully engage and understand the benefits and improvements RBA might offer.
4. Seeing RBAs working **effectively** in another jurisdiction would be an incentive to consider using the approach
5. **Cumulative effects** were seen as presenting significant difficulty in general to consenting processes and anything that could help with this would be welcome



!!MANY THANKS FOR YOUR ATTENTION!!

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Thank you

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