

Michael Shanks MP Minister for Energy Department for Energy Security & Net Zero 55 Whitehall London SW1A 2HP

Roger Morgan Chair, ENA OFTO Forum

12 June 2025

## Dear Roger,

The OFTO industry is vital to achieving our Clean Energy Mission. This government recognises the importance of securing investment in the OFTO sector for the future of UK energy supply.

I take seriously the concerns raised by the ENA OFTO Forum about decommissioning cost uncertainty for early OFTOs and its negative impact on investment sentiment. I am therefore writing to clarify government's position.

The offshore renewables decommissioning regime is based on the polluter pays principle. It is expected that all installations and structures will be fully removed at the end of their operational life to minimise residual liabilities. International Maritime Organisation guidelines state that nothing should go in the water unless it has been designed for full removal and this government endorses this principle in respect of offshore renewable energy infrastructure.

Developers and owners should ensure that best endeavours are made to incorporate environmental sensitivities into their programmes over time, incorporating precautionary assumptions where necessary. This includes knowledge of environmental impacts, including any sediment shift since construction, or new species entering the area.

Given the particular circumstances for early OFTOs (specifically, those in OFGEM's tender rounds 1-6 within DESNZ remit) it is the government's view that partial decommissioning for these OFTOs is in principle likely to be acceptable. This would mean leaving some infrastructure in situ for these projects, subject to continued monitoring and any necessary remediation post-decommissioning. However, this is subject to a further assessment for each individual project, taking into account the relevant environmental conditions, and the balance of risk, cost, and technological capabilities that are currently available. We will

initiate the normal s108 process for individual decommissioning programmes once we have conducted this assessment.

My officials stand ready to respond to any queries on the points covered in this letter.

Best wishes,

Michael Shanks MP Minister for Energy