

Feedback on the public consultation regarding the Elia-Fluxys TF scenarios

BOP took notice of the public consultation launched by Elia and Fluxys on 18 July 2025 on “the scenarios for the 10-year Federal Development Plans for electricity and hydrogen”. In this reaction we would like to respond to this consultation. We remain available for further collaboration and questions whenever deemed necessary.

Net-zero target by 2050 cannot be questioned

As the summer of 2025 proofed again, with droughts, floodings and wildfires, the climate crisis continues every day and remains as urgent as never before. The European Union committed to a legally binding framework to reach climate neutrality by 2050, with progress targets for 2030 and 2040 in the European Climate Law¹.

In this respect, the net-zero target is absolutely not questionable. Belgium has to take its fair share by aiming for the same net-zero ambition by 2050 at national level. A federal target for climate neutrality by 2050 is to remain the starting point for any scenario in the Federal Development Plans.

Grid developments are the bottlenecks for timely realisation of renewable energy projects. This has become very visible by the delay of the offshore tender for the Princess Elisabeth developments due to the delays in the grid reinforcement projects “Ventilus” and “Boucle-du-Hainaut” as well as the new offshore grid infrastructure of the MOG2.

Therefore grid developments for large (renewable) energy projects are to be anticipated to the largest extent possible, by providing long-term visibility and to explore and utilise the available possibilities under the “Anticipatory investment framework for developing forward-looking electricity networks” the European Commission has created².

Offshore wind is the no-regret technology for Belgium, as it provides the required large amounts of green energy required for climate neutrality, it is affordable due to the low LCOE and contributes to the energy security and independence of Europe. Therefore BOP welcomes energy independence targets at national and/or European level, as it contributes to society as well as the climate.

¹ [European Climate Law - European Commission](#)

² [Commission Notice on a guidance on anticipatory investments for developing forward-looking electricity networks](#)

3.3 Electricity Supply – Domestic offshore wind

Elements and assumptions to which we want to draw attention and especially welcome feedback on:

- **Domestic offshore wind assumptions:** There is currently significant uncertainty regarding the evolution of domestic offshore wind in Belgium. Do you have specific reasons and/or sources which could justify a different evolution in installed onshore wind capacity (or confirm the proposed one)?

The federal government has made a decision (2nd July 2025) to postpone the developments of offshore wind in the Princess Elizabeth zone, but at the same time committed to realising the offshore ambitions in Belgium. The Minister announced that the tender for the PEZ I will be published in Q1 2026 at the latest.

BOP agrees with the proposed scenario for the PEZ I and II, as this is in line with the new planning of the federal government:

- PEZ I: offshore wind park with a **695-735MW** capacity³ fully operational by summer **2032**
- PEZ II: offshore wind park with a **1225-1400MW** capacity fully operational by **2033**

Regarding PEZ III, BOP is convinced that, in the interest of the Belgian society and considering the significant investments made by the TSO in the energy island, a grid connection solution can be developed and realised by 2035. With all the work already done for the PEZ developments, a period of 10 years for realising this connection is already far stretched. Postponing the grid connection development to period of 2035-2040 introduces an unnecessary delay of 5 years in the required build-out of large-scale renewable.

- PEZ III: offshore wind park with a **1225-1400MW** capacity fully operational, ideally concomitantly with PEZ II but at the latest by **2035**, provided that a solution giving unrestricted access to the domestic market must be found, i.e. no offshore bidding zone setup.

BOP fully agrees with the necessity to reach for the **8 GW ambition by 2040**:

- BOP supports the assumption for a **new development zone(s) is to be defined and developed between 2035 and 2040**. BOP identified areas where the new developments are feasible within the Belgian EEZ and proposed these areas to the DG Environment (FPS Public Health, Food Chain Safety and Environment) during the process for updating the Marine Spatial Plan.
- According to the current concession agreements, repowering of the existing zone is to start from 2039. Concessions are currently provided until 2048. Given the current concession agreements, this implies that the repowering of the wind parks will have to be performed in the period 2038 to 2048. BOP therefore supports the assumption for **the refurbishment of the grid connection to be planned in the period 2035-2040**, to avoid delays caused by late grid connections.

³ The capacity for the PEZ I is commonly referred to 700MW but, according the MD Lots of 20 December 2024, there is a minimum installed capacity 695MW and a maximum installed capacity of 735MW. This implies that a 735MW grid connection solution is to be provided by the grid operator.

- As indicated in the consultation note, during repowering, the capacity in the Eastern Zone will be partially reduced. The exercise to optimally repower the zone considering the continuity of production is still to be detailed. Also the legal framework for the redevelopment is to be defined, ideally 10 years before the end of the concessions to ensure an optimal and, to the maximum extent possible, uninterrupted, utilization of the scarce areas dedicated to offshore wind.
- Following completion, BOP expects a limited incremental impact from the repowering on the total installed capacity of offshore wind in the Eastern zone. The total capacity after repowering will be defined by the density (MW/km²). Given the sheer size of our EEZ, Belgium has chosen to develop the zone with a high density, in order to maximize the electricity output, albeit against a slightly higher LCOE. Redeveloping at a higher density is not expected. Technological innovation drives the turbines to grow in capacity in order to reduce costs, but also in turbine spacing.
- As the available area of the Eastern zone is optimized (in the update of the Marine Spatial Plan 2026-2034), the proposal might even be slightly improved to find an extra ~75km², bringing the total area of the Eastern zone at ~300km² (compared to 238km² today). We propose to calculate with a density of 10MW/km², bringing the total capacity of the Eastern zone at **3000 MW after repowering**.

3.4 Electricity Supply – Non-domestic offshore wind

Elements and assumptions to which we want to draw attention and especially welcome feedback on:

- **Non-domestic offshore wind assumptions:** There is currently significant uncertainty regarding the evolution of domestic offshore wind in Belgium. Do you have specific reasons and/or sources which could justify a different evolution in installed onshore wind capacity (or confirm the proposed one)?

To the extent the domestic potential is insufficient to reach the climate ambitions, BOP supports the possibility of adding non-domestic offshore wind into the Belgian energy mix, provided however that priority is to be given to connecting and developing the full potential of domestic projects, which are the lowest hanging fruits.

Although they may contribute to diversify the wind resource risk in the long run, foreign offshore wind projects will inherently come at a higher price due to the larger distance from shore, the seabed lease, risk premiums in hybrid set-ups etc... They cannot be seen as equivalent alternatives to domestic projects because, ultimately, they will contribute less to the Belgian economy. Moreover, regulatory frameworks for cross-border (radial) projects are under development and agreements with (neighbouring) countries are to be initiated for a timely realisation.