

The American offshore wind industry has significant concerns with Amendment 184 included in H.R. 6865, the Coast Guard Authorization Act of 2022

Amendment 184 would delay the President's goal of deploying 30,000 MW of offshore wind by 2030 by not allowing offshore wind developers to utilize necessary construction vessels, such as wind turbine installation vessels (WTIV). The US risks losing the deployment of up to 1,460 MW of offshore wind per year and eliminating 4.9 million tons of CO2 per year for each WTIV that is not able to comply with the new regulations and finds more cost competitive work outside the US.

The American Clean Power Association (ACP) is seriously concerned with the requirements imposed by Amendment 184 of the Coast Guard Reauthorization Act which will delay our ability to meet state and federal offshore wind and climate goals and asks that it be removed.

The offshore wind industry will support up to [83,000](#) jobs over the next decade, which includes thousands of American mariners. However, mandating a 100% American citizenship requirement for mariners on these vessels or requiring the Coast Guard to establish an exemption process will impede our ability to contract critical construction vessels within established offshore wind development timeframes. This 100% requirement will not only impede the hiring of American mariners required by the Jones Act, but also the tens of thousands of workers in other offshore wind occupations. Instead of this mandate, Congress should focus on the training of American mariners, which will help achieve our domestic offshore wind goals, address labor shortages in the maritime transportation space, and address MARAD's existing concerns with meeting military sealift capacity.

Custom and Border Protection's long-standing interpretation of the Jones Act *already requires* the transportation of merchandise between offshore wind turbine foundations and US ports to be done by American mariners on US-flagged ships. This system has successfully operated for decades in other offshore development contexts. The majority of [offshore wind vessels](#) will transport merchandise once supply chains are built and therefore will be US-flagged and use American mariners.

An important minority of foreign mariners will still be needed to crew specialized foreign-flagged ships. Custom and Border Protection's long-standing interpretation of the Jones Act asserts that foreign-flagged vessels can do certain construction activities on the US Outer Continental Shelf such as heavy lifts, cable lay, and oceanographic research that support project permitting. These vessels are rare on a global basis and the offshore wind industry cannot be built without them. For example, [only three wind turbine installation vessels](#) exist in the world that can do the heavy lifts to construct a 14-megawatt turbine—and they are all foreign-flagged. A [Tufts study](#) shows that 5 WTIVs will be required to meet the President's goal of deploying 30,000 MW of offshore wind by 2030. The US risks losing the deployment of up to [1,460 MW](#) of offshore wind per year and eliminating 4.9 million tons of CO2 per year for each WTIV that is not able to comply with the new regulations and finds more cost competitive work outside the US. These vessels are the linchpin for installing fixed bottom offshore wind turbines and are in high demand across the world.

The UK, Europe, South Korea, Taiwan, and China all have aggressive offshore wind goals and the US offshore wind industry will be competing with them for these vessels. In order to compete, the offshore wind industry will need to use the crews that have experience working onboard these specialized vessels and stay with those vessels as they work in the global offshore market. Implementing an uncertain exemption process will prevent offshore wind developers from hiring these vessels with enough advance notice to be globally competitive and will delay or even derail clean energy projects.

The offshore wind industry and Congress ultimately all have the same goal: maximizing the number of American mariners employed in the US offshore wind industry without creating delays and logistical hurdles that will impede the development of the industry. There are several ways we can work together to achieve that.

First and foremost, Congress can take affirmative steps to help ensure there are enough trained mariners to build out offshore wind and achieve military readiness for emergency sealift. In its [2020 Report to Congress](#), MARAD expressed concern regarding capacity to crew US sealift assets during times of national emergency. The Offshore Marine Service Association has [written](#) to the USCG noting these concerns. The [Military Sealift Command Careers Page](#) advertises large bonuses to attract more workers. Congress could help build the offshore wind industry, address the offshore worker shortage, and address national security concerns on sealift capability by:

- Reducing barriers for veterans and past qualified American Merchant Mariners with expired credentials to re-qualify/re-join the US marine industry
- Creating incentives for the build out of specialized offshore wind vessels including allowances to allow US-flagged vessels to work abroad without undue restrictions
- Supporting US Maritime Centers of Excellence, Maritime Academies, industry training providers, and labor unions across the US to identify, resource, and address skills gaps

Legislation such as the Offshore Wind Jobs and Opportunity Act and the Sen. Wicker-Cardin Maritime Technological Advancement Act are good starting points to help achieve these objectives. These efforts could also feed into a new US Coast Guard Center of Expertise on Offshore Wind to be a center for education, training, and research focused on timely and constructive collaboration for all involved in the offshore wind industry.

ACP is proposing an affirmative and collaborative alternative to a heavy-handed blanket requirement that would undercut the President's goal to deploy 30 GW of offshore wind by 2030. We believe that we can work with Congress to resolve concerns with annual verification of vessel ownership and visa requirements in the bill and come to a consensus on how to improve this important regulatory system. That approach, coupled with a joint effort to put in place enhanced training programs, a reduction of the barriers to entry to the US maritime sector, and incentives to build out the US-flagged fleet will provide further assurance that the maximum number of American mariners will be employed in the deployment of the brand new American offshore wind industry.

