

Ramón de la Figuera  
Director General of Sustainable Fisheries  
Secretaría General de Pesca  
Ministerio de Agricultura, Pesca y Alimentación  
C/ Velázquez, 144. 5ª Planta.  
28006 Madrid, Spain

Dun Laoghaire, 17 February 2025

Dear Mr de la Figuera,

**Subject: NWWAC/PelAC advice on renewable energy developments in the marine space**

In 2020 the North Western Waters AC and the Pelagic AC established a joint Focus Group on impacts from seismic activities and offshore wind farms which developed two separate advice submissions to the Commission for a non-recurrent request to ICES on seismic impacts (04 August 2020, [link](#)), and for a non-recurrent request to ICES on the impact of marine wind energy developments on commercial fish stocks (04 November 2020, [link](#)), the latter also supported by the North Sea AC. In both replies from 14 October 2020 ([link](#)) and 14 December 2020 ([link](#)). The Advisory Councils followed up on this work with a joint virtual workshop on the impacts of seismic and offshore wind energy developments on fisheries on 10 May 2022 ([link](#)) which culminated in the submission of joint advice on the impacts of underwater noise and offshore wind energy developments on commercial fisheries (11 October 2022, [link](#)) and the publication of a detailed report ([link](#)).

Potential impacts from ORE developments as well as the ‘spatial squeeze’ due to the number and extent of site applications is of great concern to the ACs. This is compounded by the fact that the [EU Biodiversity Strategy](#) sets the target of protecting 30% of EU land and sea by 2030 potentially leading to further displacement and closing down of EU fisheries. Therefore, a joint Focus Group Spatial Dimension was established in 2023 to continue the work first started in 2020, and a joint letter was submitted to the European Commission on 20 June 2024 calling for increased policy coherence between environment and fisheries dimensions ([link](#)).

At the latest meeting of the joint Focus Group ([link](#)), members were presented with an overview on the Study on the designation of renewables acceleration areas (RAAs) for onshore and offshore wind and solar photovoltaic energy<sup>1</sup>.

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<sup>1</sup> European Commission: Directorate-General for Energy, Demurtas, A., Kralli, A., Falco, F., Ying Lee, L. et al., *Study on the designation of renewables acceleration areas (RAAs) for onshore and offshore wind and solar photovoltaic energy – Final report*, Publications Office of the European Union, 2024, <https://data.europa.eu/doi/10.2833/716552>



It identifies that under the revised Renewable Energy Directive<sup>2</sup>, Member States are obliged to “adopt one or more plans designating [...] renewables acceleration areas for one or more types of renewable energy sources”. The requirements for the identification of areas suitable to be designated as renewables acceleration areas laid down in Article 15c(1)(a), including the provision that “By 21 February 2026, Member States shall ensure that competent authorities adopt one or more plans designating, as a sub-set of the areas referred to in Article 15b(1), renewables acceleration areas for one or more types of renewable energy sources.” In addition, “plans designating renewables acceleration areas shall be subject to an environmental assessment pursuant to Directive 2001/42/EC of the European Parliament and of the Council”. Article 15d specifies that “Member States shall ensure public participation regarding the plans designating renewables acceleration areas referred to in Article 15c(1), first subparagraph, in accordance with Article 6 of Directive 2001/42/EC...”

As representative and legitimate EU fisheries stakeholder bodies which are legally recognised as organisations pursuing an aim of general European interest, the Advisory Councils strongly believe that they should be included in these consultation processes. The benefits of early stakeholder engagement and public participation were identified in the RAA study: “Engaging stakeholders and seeking the participation of the public at the early stages of RAAs’ planning – before the formal SEA and AA consultations on the plan(s) are put in place – could benefit the process of identifying and designating RAAs for several reasons.” Therefore, the ACs wish to enquire how the requirements of the Renewable Energy Directive are currently being implemented by the administrations of the North Western Waters Member States Group and what timelines are in place to achieve compliance by February 2026.

While an assessment of the potential environmental impacts of any new development in the marine space is essential, AC members wish to emphasise that sustainability is measured across three pillars: environmental, economic and social. With the world experiencing a triple planetary crisis, the EU fishing sector is witnessing first-hand the consequences of climate change and biodiversity loss impacting participation and profitability of the seafood industry. While the sector continually works to improve its performance to support reaching the goals set out in the Green Deal and thus contribute sustainably to Europe’s food security, the rapidly increasing pressure from other developments in the marine space adds to the threat of declining socio-economic viability of the fishing industry. This in turn affects the still vibrant coastal communities in Europe many of which rely on fishing (and aquaculture) as their primary source of income. AC members consider it vital that any renewable energy developments in the marine space undergo a socio-economic assessment to determine the potential impact on the seafood sector as a whole, including taking into account potential job losses downstream.

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<sup>2</sup> Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328 21.12.2018, p. 82), as amended by Directive (EU) 2023/2413 (OJ L, 2023/2413, 31.10.2023)



Therefore, the NWWAC and PelAC would like to ask the administrations of the NWW Member States Group to include such assessments in the planning and evaluations of future renewable energy developments in the marine space.

We thank you for your attention on these matters and look forward to your response.

Yours sincerely,



Emiel Brouckaert  
NWWAC Chairman



Esben Sverdrup-Jensen  
PelAC Chairman