

NWWAC/PelAC Advice on the impact of Offshore Renewable Energy Developments on commercial fisheries

03 June 2025

Background

In 2020 the North Western Waters AC (NWWAC) and the Pelagic AC (PelAC) 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 Commission stated that the request was not appropriate as it would not fit into the scope and timeframe in the Commission's cooperation with ICES.

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).

Legislative developments in Ireland due to the energy crisis, triggered by the war in Ukraine, led to the ACs holding a Briefing on the Maritime Area Planning Act Ireland 2021 on 19 January 2023 (link). The aim was to gather knowledge and information on the content of the Maritime Area Planning Act 2021 and its impacts on the fishing areas in the Irish EEZ.

Potential impacts from ORE developments as well as the 'spatial squeeze' due to the number and extent of ORE site applications is of great concern to the ACs. This is compounded by the EU Biodiversity Strategy setting 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. The group reported on its work at the joint Horizontal Working Group meeting in Dublin Castle on 14 March 2024 (link), where members of both ACs identified joint topics and priorities for 2024. This was followed by the submission of a joint letter to the European Commission on 20 June 2024 calling for increased policy coherence between environment and fisheries dimensions (link).

The Focus Group also reviewed work carried out in Ireland related to the future designation of Marine Protected Areas (MPAs) and submitted its concerns regarding the methodology and conclusions in December 2024 (<u>link</u>) to the Department of Environment, Climate and Communication (Ireland).



Finally, in February 2025 the ACs submitted advice to the North Western Waters Member States group on renewable energy developments in the marine space (link) in which it was highlighted that the Advisory Councils should be included in the consultation processes identified in the Renewable Energy Directive¹. They also expressed the need for renewable energy developments in the marine space to 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.

Research regarding potential impacts of ORE developments is increasing internationally as well as nationally, and it is vital that the ACs base their work and advice on the most up to date scientific knowledge. For example, more than 20 ICES groups have Terms of Reference related to ORE, including WKWIND, WGORE, WGOWDF, and WGMBRED, and ICES recently published their Roadmap for Offshore Renewable Energy identifying priorities for 2024 – 2025 (Link). A DG MARE advice request on the economic and social impacts of ORE on fisheries and methodologies to assess impacts in the Celtic Seas, Greater North Sea and Baltic Sea was delivered in April 2025 (Link).

Due to the wide array of work being carried out on this topic, NWWAC and PelAC decided to organise a webinar with the aim of bringing together representatives from the European Commission, the Advisory Councils, and the international scientific community to discuss in detail and progress on the dentification of latest scientific developments regarding impacts of ORE developments on fisheries, the integration of ORE developments with Marine Spatial Planning (MSP) and MPA planning, and the potential positive effects of ORE on biomass or other elements. The following recommendations are based on discussions held at this webinar.

Recommendations

- 1. Increased inclusion of fisheries in MSP and MAP planning while recognising the fishing sector's role in European food security. There is a risk of inconsistency between the EU food policy ambitions, its energy targets and its conservation objectives. The key role of fisheries in terms of food security and socio-economic benefits must be brought to the foreground, as achieving compatibility with healthy marine ecosystems is possible and essential, and energy objectives must not undermine either of them.
- 2. Regionalisation must be improved to ensure meaningful stakeholder participation, specifically in MSP and MPA planning. A key concern for the ACs is that MPA designations can be based on existing NATURA 2000 designations. Whilst the Habitats Directive does not have provisions requiring public consultation on the designation of Natura 2000 sites, this is because the Directive was conceived and formulated before such stakeholder engagement

¹ 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)



was considered a vital step in any such process. The European Commission stated in its 2022 Staff Working Document on Criteria and Guidance for Protected Areas Designations² that "it is (therefore) essential that Member States involve all relevant stakeholders, including land owners, managers and users, indigenous peoples, local communities and NGOs in the identification, designation and management of new protected areas, in a fair and participatory way, in line with the Aarhus Convention and in accordance with national procedures". ACs believe that stakeholder consultations should be made mandatory under the Habitats Directive, and at a minimum in line with the requirements of the Birds Directive. In addition, the ACs feel that stakeholder involvement must be improved and wish to refer to the "General guidelines for stakeholder participation processes" as developed by the MPA Advisory Group Ireland 20203 (link) which outline improved positive stakeholder engagement in greater detail. Regarding MPAs, the ACs emphasise the importance of involving stakeholders from the fishing industry and ports, and OIG representatives from the beginning. This early engagement is key to building trust, fostering acceptance, and creating opportunities for collaboration, while ensuring that all perspectives are integrated into the development of well-balanced and effective measures.

- 3. It is essential to improve coordination between all administrations involved in the marine space. The ACs highlight the cross-jurisdictional dimension of this issue, not only between different Member States and third countries, but also within national administrations, and even within the EU at least between environment and fisheries administrations. For example, the European Green Deal sets ambitious targets, some aligned with international commitments (e.g., the Convention on Biological Diversity) and internal EU objectives (e.g., Net Zero). However, key policy initiatives, especially the EU Strategy on ORE, will significantly impact the fishing sector. Some implementation scenarios indicate a substantial reduction in available fishing space, commonly referred to as the "spatial squeeze." The co-location of offshore wind farms and fishing activities presents major technical, institutional, and organisational challenges that will need to be addressed moving forward
- 4. AC members refer to the **findings of the European Court of Auditors** in its Special Report: Offshore renewable energy in the EU⁴, specifically that "Deploying offshore renewable energy faces practical, social, and environmental challenges that have not yet been sufficiently addressed", and that "Increased EU ORE targets will lead to the development of installations at sea. This may result in a progressive reduction of access to fishing areas, which could lower revenue from fishing and increase competition between fishermen." The report also notes that "We could not find any **quantification of the key economic effects on fisheries resulting from ORE development** that had been prepared by the

² https://environment.ec.europa.eu/publications/criteria-and-guidance-protected-areas-designations-staff-working-document en

³ Expanding Ireland's Marine Protected Area Network, DHLGH 2020; Section 3.2.3 Fostering societal stewardship through participation

⁴ https://www.eca.europa.eu/ECAPublications/SR-2023-22/SR-2023-22 EN.pdf



Commission". Therefore the ACs strongly recommend for the Commission to carry out this analysis.

- 5. **Assessment tools** for potential impacts of ORE on both fisheries and the environment must be spatially adequate in order to assess any direct impacts from a development as well as potential cumulative impacts. Currently assessments are carried out at different spatial resolutions, and a finer resolution in the analysis will better present the interactions between sectors and potential effects. Secondly, ACs believe it is essential to conduct a thorough impact assessment of ORE to ensure the safety of fishing operators. Special attention should be given to the challenges posed by cable crossings and their impact on fishing vessels, as well as the need to modify their routes. Such changes can significantly increase safety risks, particularly in adverse weather and sea conditions.
- 6. AC members refer to the **recommendations of the ICES Special Request Advice** on the EU request on economic, social, and ecological impacts of offshore wind farms (OWFs) and floating offshore wind farms (FLOWs) on fisheries in the Baltic Sea, Celtic Seas, and Greater North Sea⁵, noting specifically:
 - a. "Systematic review of available studies identified OWF and FLOW impacts on income, fishing grounds, catch opportunities and operating costs in EU Member States. For all types of impacts, there were more studies reporting on negative impacts on fisheries than studies reporting on positive impacts."
 - b. "Existing available data are mostly not collected or collated at sufficiently high resolution, and cannot yet be linked in ways that enable full evaluation of direct or indirect economic and social impacts of wind farms."
 - c. Primary production can be affected as "Wind turbines create atmospheric wakes, and their underwater structures modify currents and stratification."
 - d. "Some pressures associated with the phases of OWF and FLOW development have known or predicted local impacts on commercially fished species... Sediment resuspension was the most impactful pressure."
 - e. "Based on the observed colonization of other floating structures, the transport of FLOW turbines between ports and wind farms may facilitate the spread of non-indigenous species."
 - f. "Dynamic cables associated with FLOW may affect pelagic species because of direct energy emissions, physical effects, and/or indirect ecological effects."

⁵ https://ices-



- g. "Cumulative assessments would be facilitated by higher resolution economic, social, and ecological data, including information on the locations and developmental phases of wind farms at ecoregion scales."
- h. "Stakeholder involvement, engagement and co-design help to enable development of mitigation options that are technically, economically, politically, socially, and ecologically feasible and that are supported, or at least accepted, by stakeholders."
- 7. AC members urge the Commission to carefully review the advice provided by ICES and ensure that Member States take these fully into account when planning ORE developments. Cross-boundary effects of ORE developments must be evaluated and a harmonised approach to developments must be ensured.
- 8. The ACs recommend that the collection of data related to ORE developments is broadened with similar detail collected as for fisheries. This would allow for risk assessments to be scaled up to population level rather than remaining at local level.
- 9. Terms of the current data collection framework should be reviewed in order to allow a better linkage between linking positional data with economic and social data. An important aspect to consider for ORE developments is not just the location of fishing grounds but also steaming locations related to fishing effort.
- 10. Additional research is urgently needed regarding the potential impacts of electro-magnetic fields created by cables, and specifically those linked to floating offshore wind energy developments.