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Letter by e-mail attachment to:

Mr. Felix Leinemann, DG MARE A2 (felix.leinemann@ec.europa.eu)

EAPO20-38 / EP(50)

Ostend / Brussels, 24 September 2020

Dear Mr. Leinemann,

Subject: EAPO-Europepeche position on the Recommendations for positive interactions between offshore wind farms and fisheries, Short Background Study, of May 2020.

The Commission study wishes to propose an assessment of current practices and ways to prevent conflicts between fisheries and offshore wind farms.

The study makes it clear that offshore wind farms exert more competition for space. The increasing number of turbines per farm (from 50 to now 150 or more) in conjunction with a deployment to deeper waters (now to more than 100m depths) means that offshore wind farms are using ever greater space at sea. Moreover, the rise in offshore wind production is projected to go from the current 22GW to 270GW by 2040. With the present capacity production ratios (5 to 10 MW/km²) this means finding an additional 25.000 km² to 50.000 km² for new projects, and 43.000 km² to 86.000 km² if the EU wishes to uphold its vision of a carbon neutral Europe. These figures are excluding the gap that would need to be filled with the UK leaving the EU as they account for 45% of the current 22GW and excluding the buffer zones needed around the wind parks to avoid dangerous situations.

This spatial usage and the exclusion of fisheries are “*the most recurrent sources of tension*” (p.10). The study however downplays the conflicts and echoes the myth of a so-called “*happy co-existence*” that is built by the wind energy sector, whereas most actual fishing activities remain excluded from the offshore wind farms (p. 17). EAPO and Europepeche are of the opinion that the impacts of windfarms on

fish stocks and the marine environment cannot be only considered an “indirect conflict” (p.10). The fact that “most of the 110 European offshore wind farms seem to have been developed without any major conflicts” (p.15) is a conclusion which Europêche and EAPO find hard to believe as the fisheries sector is for obvious reasons opposed to the installation of vast windfarms in its traditional fishing grounds. Besides, the Member States where the study found less to no conflict between the sectors, are countries which either chose to build the farms in areas with initially low fishing activity and/or gave compensation of losses to fishermen or fisheries organisations (p. 15, p. 18).

The study furthermore explores the economic losses for fishers, the environmental effects and the social consequences, including increased pressure for fishing grounds in the remaining areas, causing not only more conflicts, but also increases the carbon footprint of a sector which proudly managed to decrease their emissions by 40% over the last 3 decades. The concerns about the impacts of the operation of turbines on commercial species are mentioned. However, the study fails to highlight the issue of the broader environmental consequences of the continuous operation of windfarms at sea. The long term effects of a large rollout of offshore projects, risk impairing the physical functioning of sea basins (local wind patterns, wave generation, tidal amplitudes, stratification of the water column, dynamics of suspended particles and bedload transport of sediment) as a result of cumulative effects. The potential collateral damages are alarming with “*far-reaching consequences for the ecological functioning of the marine environment?*”¹. The fishing industry does not concur with the idea that “most reviews of wind farm ecological monitoring data were inconclusive” (p.14), and recalls the latest report from the Commission on the implementation of the Marine Strategy Framework Directive (MSFD), alerting that renewable energy production is one of the “*main activities reported under the MSFD causing physical loss of benthic habitat*”². In addition, the report “*predicts inevitable effect on marine species and habitats by the unprecedented increase in offshore renewable energy*”.

Coming back to the offshore wind farm study, in its second part, it lists, proposals to “*soothe tensions*”. The mentioned *assessing the socio-economic incidences on fisheries*” (p.16) is a key point for Europêche and EAPO. The document also explains one of the crucial shortcomings of the assessment of offshore wind farm effects on fisheries which are “*currently assessed at individual level, forgetting the importance of considering cumulative effects of all offshore wind farm at regional or sea basin level*” (p.16). In addition, the fishing industry recalls the cumulative effects on fisheries of all sea users, including increasing competing activities and area closures, from tourism and marine protected areas to oil and gas rigs, and aggregate extraction, let alone the requested additional nature conservation areas by environmental NGOs as a compensation for offshore wind farms.

Europêche and EAPO are also of the opinion that one key recommendation for positive interaction between the sectors not mentioned in the report, is for EU policy makers not to aim for specific objectives with big figures to reach media headlines without taking into account the full picture of associated consequences. The previous joint EAPO-Europêche response to the Offshore Windfarm

¹ Boon, Arjen & Caires, Sofia & Wijnant, I.L. & Verzijlbergh, R. & Zijl, Firmijn & Schouten, J.J. & Muis, Sanne & Kessel, T. & van Duren, Luca & Kooten, T. (2019). The assessment of system effects of large-scale implementation of offshore wind in the southern North Sea. 10.13140/RG.2.2.23113.60000.

² COM(2020) 259 final

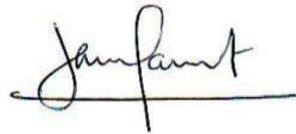
Renewable Energy Strategy roadmap³ made it clear: *“Don’t change fishers by windmills, adopt a precautionary approach and halt the current expansion of offshore wind parks until research has come up with answers to the many existing knowledge gaps”*.

In conclusion, this study presents some aspects of the interactions between fisheries and offshore wind. Important negative aspects of offshore wind are overlooked and key solution for better interactions are also disregarded. To EAPO and Europêche, the most troubling about the report is that it fails to debunk the Commission’s rhetoric of the Biodiversity Strategy⁴ that presents offshore wind as a *“win-win”* solution that *“also allows for fish stock regeneration”* (p.9). This is a truly concerning perspective where environmental impacts of windfarms are overlooked and even more so the socio-economic consequences on the fishing communities, - communities - as recognised in the report - with historic activities which have a low permanent footprint as opposed to offshore wind farms (p. 6).

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'P. Visser', with the name 'P. Visser' written in a smaller font below the signature.

Pim Visser,
President of EAPO

A handwritten signature in blue ink, appearing to be 'Javier Garat', with a horizontal line drawn below the signature.

Javier Garat
President of Europêche

³ <http://www.eapo.com/UserFiles/EAPO20-31.pdf>

⁴ COM(2020) 380 final