European Association of Fish Producers Organisations
Association Européenne des Organisations de Producteurs dans le secteur de la pêche

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Letter by e-mail attachment to:
MEP Mr. van Dalen (peter.vandalen@europarl.europa.eu)

EAPO20-51 Ostend, 4 November 2020

Dear Mr. van Dalen,

Subject: EAPO's views on the impact of windfarms on fisheries

We are writing to you in reference to your INI Report on the Impact of offshore windfarms and other renewable energy systems on the fishing sector. EAPO looks forward to seeing your report and would like to offer its expertise to help with the drafting in this respect.

The PECH Committee recently published a study on the impact of the use of offshore wind and other marine renewables on European fisheries, that will feed in the preparation of your report. This study succeeds in highlighting the increased risk of spatial conflict that will result from the huge deployment of offshore windfarms that is foreseen in the EU. There are already 5047 grid-connected turbines installed in more than 314 offshore renewable plants already in place in European seas. The fishing industry agrees with the study when it insists on the importance of economic impact assessments of the effects of windfarms on fisheries to look at direct and indirect costs for lost fishing opportunities. At the moment those are "barely understood". The broader consequences on the onshore economy and on the coastal communities are also mentioned. The general lack of information on this last point is stressed and so is the need for additional research in that respect.
The scale of spatial competition is much more important, even what is presented in the study as "blue economy" activities are much broader than just windfarms. This comes in addition to MPAs increasing encroachment on traditional fishing grounds. The Biodiversity Strategy proposal to increase MPAs to cover 30% of the seas will only worsen this issue.

However, some concerning remarks are included in the study. While the authors recognise that there is no scientific proof of positive "conservation" effect of windfarms on fish stocks, they still suggest that this is something possible. EAPO is clearly opposing this view that seems like an argument stemming from the windfarm sector that is not based on scientific assessment rather on the myth of "synergic" activities.

Moreover, a key point is overlooked in this study. This is the environmental consequences on marine ecosystems of the deployment of large industrial structures at sea. The latest report from the Commission on the implementation of the Marine Strategy Framework Directive (MSFD), is alerting that renewable energy production is one of the "*main activities reported under the MSFD causing physical loss of benthic habitat"*. There are many environmental impacts of the continuous operation

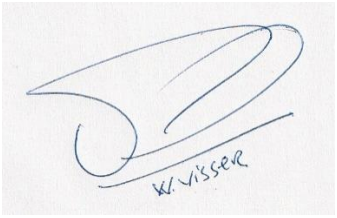
of windfarms at sea. The long term effects of a large rollout of offshore projects, risk impairing the physical functioning of sea basins (local wind patterns, wave generation, tidal amplitudes, stratification of the water column, dynamics of suspended particles and bedload transport of sediment) as a result of cumulative effects.
This will have a huge impact on ecosystems and therefore on fish stocks and fisheries in the area. Fishermen are guardians of the sea. Opposite to the windfarm sector, the fishing one relies entirely on the good state of marine ecosystems. These environmental issues risk jeopardising the efforts achieved by fisheries to become sustainable. They therefore need to be included when looking at the impact of windfarms on fisheries.

The points we see as central to be included in a thorough study on the impacts of offshore windfarms on fisheries are the following:

- Recognition of the threat of the huge scaling up of deployments of industrial structures at sea and associated consequences (rising spatial conflict, cumulative environmental impact).
- Importance of thorough integrated impact assessment of cumulative deployment and socio-economic consequences on fisheries (direct and indirect) and on onshore communities.
- Need to identify knowledge gaps and unknowns (environmental and socio-economic impacts), and to apply the Precautionary Approach.
- Understanding fishing as a traditional activity with unpredictable fishing patterns, capital for coastal communities, bringing onshore low carbon high quality food. Fishermen depend on the ocean for a living, they are guardians of the sea.

EAPO would like to once again offer to work with you on the topic. We thank you for always taking into account the fisheries perspective in your work and remain fully available for discussions on this topic.

Yours sincerely,



Pim Visser
President