

## European Association of Fish Producers Organisations

### Association Européenne des Organisations de Producteurs dans le secteur de la pêche



**EAPO / AEOP**

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#### Letter by e-mail attachment to:

DG MARE - Ms. Charlina Vitcheva ([Charlina.Vitcheva@ec.europa.eu](mailto:Charlina.Vitcheva@ec.europa.eu))

#### CC:

- *Commissioner Mr. Virginijus Sinkevičius* ([cab-sinkevicius-contact@ec.europa.eu](mailto:cab-sinkevicius-contact@ec.europa.eu))
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EAPO21-05

Oostende, 20 January 2021

Dear Ms. Vitcheva,

#### **Subject: EAPO position on Offshore Renewable Energy Strategy**

On the 19<sup>th</sup> November 2020, the Commission published the Offshore Renewable Energy Strategy. EAPO commends the EU for its Climate targets and ambitions to reach 55% greenhouse-gas emissions by 2030. As stated in the fishing industry response to the Commission's Roadmap<sup>1</sup>, EAPO's view is that such goal can only be reached by adopting a pragmatic approach, avoiding dogmatic choices, and working with all sectors. If the EU is to meet its objectives, it is clear that renewable energy will be needed. However, this should not come at the expense of the fisheries sector. EU fisheries provide for sustainably caught animal proteins with the lowest carbon footprint. Seafood has the ability to help drastically reduce greenhouse gas emissions linked to food diets. As such, not only should it be promoted, but the Commission should ensure that fishing operations can be sustained.

*Spatial competition and EU objectives*

<sup>1</sup> EAPO20-31 <http://www.eapo.com/UserFiles/EAPO20-31.pdf>

EAPO doesn't believe that the proposal to roll-out huge amounts of industrial equipment through windfarms at sea is a sensible approach. The Offshore Renewable Strategy estimates that this will require *"less than 3% of the European maritime space"*. This is to be put in perspective with the further explanations that *"The North Sea has a high and widespread natural potential for offshore wind energy"* and that reaching the target set of 300GW *"will require identifying and using a much larger number of sites"*. Concretely, this will translate in the concentration of windfarms in coastal areas, on age-old traditional fishing grounds.

The reduction of marine space available for fisheries is only continuing what has been observed for years now, with the development of offshore oil & gas, Natura 2000 sites, aggregate extraction, Marine Protected Areas, etc. The cumulative loss of fishing grounds threatens the economic viability of the sector. Operational costs increase since more fuel and time are needed to reach alternative fishing grounds and fishing competition grows in remaining places.

Therefore, questions can be raised regarding the implications of such choices on food security or on the reliance of food imports from third countries with less stringent sustainability requirements.

#### *Employment opportunities for all?*

One other worrying argument presented in the Offshore Renewable Energy Strategy is the presentation of alleged *"major benefits in terms of jobs and growth"*. EAPO recalls the joint EAPO-Europêche feedback to the Commission's public consultation<sup>2</sup>, highlighting that a first requirement for guaranteeing growth and employment, is to not destroy fishing jobs that allow coastal rural families and communities to thrive across Europe. Moreover, the jobs offered by the offshore renewable energy (ie: *"researchers, engineers, scientists and engineering technicians"*) are significantly different from the one of fishermen and therefore cannot provide for alternative employment. In addition to not being coherent with other policies such as the Farm to Fork Strategy, substituting fishing boats for offshore wind farms is not a sustainable solution.

#### *Environmental impact and knowledge gaps*

EAPO is in line with the approach taken by the Commission when it states that *"offshore renewable energy will only be sustainable if it does not have adverse impacts on the environment as well as on the economic, social and territorial cohesion"*. The fishing sector has been calling repeatedly for increased scrutiny on the potential environmental and socio-economic impacts of offshore wind developments. This needs to come through thorough ex-ante and ex-post integrated cumulative impact assessments.

The installation, functioning and decommissioning of offshore windfarms have an impact on the marine environment. Many are still unknown but others such as the impact on fish and marine mammals of underwater sound<sup>3</sup>, the *"physical loss of benthic habitat"*<sup>4</sup>, or the *"far-reaching*

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<sup>2</sup> EAPO20-31 <http://www.eapo.com/UserFiles/EAPO20-31.pdf>

<sup>3</sup> Thomsen, F., Lüdemann, K., Kafemann, R., Piper, W. (2006). Effects of offshore wind farm noise on marine mammals and fish, Cowrie Ltd.

<sup>4</sup> European Commission, 2020. Commission Staff Working Document - Review of the status of the marine environment in the European Union Towards clean, healthy and productive oceans and seas, SWD(2020) 61 final, Brussels

*consequences for the ecological functioning of the marine environment*<sup>5</sup> are clearly demonstrated. The amplitude of the developments foreseen had cumulative effects that 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). Questions remain on several aspects of offshore wind development such as decommissioning of the installations. Further research is necessary before proceeding to a large roll-out of industrial installations at sea. When it comes to the environmental consequences of offshore wind farms, a precautionary approach is needed.

#### *Fisheries: true European success story*

The Strategy presents Offshore Renewable Energy as a “*true European success story*”. For EAPO, the EU features another success story: the one of sustainable fisheries. In only ten years, thanks to incredible efforts from the fishermen, the fish biomass has increased by 50%. Nowadays, 99% of landings in the Northeast Atlantic come from sustainably managed fisheries<sup>6</sup>. In the meantime, greenhouse gas emissions of the sector have been almost halved in the last thirty years. Fisheries achieved this important progress while providing jobs both at sea and onshore and ensuring livelihoods for coastal communities. This success story needs to be recognised and promoted.

EAPO looks forward to reading the further analysis of the interactions between offshore renewable energy and other activities at sea that is being prepared by the Commission. The fishing sector will also be present at the High Level European Offshore Renewable Conference in 2021.

Yours sincerely,

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

EAPO President  
Pim Visser

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<sup>5</sup> 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.

<sup>6</sup> COM(2020) 248 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0248&rid=3>