

## **NWWAC response to the Call for Review of the draft report on “Cumulative impacts of offshore wind farm expansions: consequences & solutions for achieving GES across European marine waters”**

27 June 2025

The North Western Waters AC (NWWAC) welcomes the opportunity to respond to the Call for Review of the draft report on “Cumulative impacts of offshore wind farm expansions: consequences & solutions for achieving GES across European marine waters” ([link](#)). Due to the tight deadline for responses, the Advisory Council (ACs) was unable to provide a response using the prescribed online format. The AC provides consensus-based advice involving several internal review, consultation and approval procedures which require sufficient time for discussion and consensus building. Therefore, it was decided to provide a response in the format of an open letter.

Since 2020, the NWWAC has collaborated extensively with the Pelagic AC on the topic of offshore renewable energy developments and potential effects on commercial fisheries, starting with the establishment of a joint Focus Group, and including

- NWWAC/PELAC advice for non-recurrent request to ICES on seismic impacts (August 2020, [link](#))
- NWWAC/PELAC/NSAC advice for a non-recurrent request to ICES on impacts of wind energy developments (November 2020, [link](#))
- Workshop on the impacts of seismic and offshore wind energy developments on fisheries on May 2022 ([link](#))
- Joint NWWAC/PelAC advice on the impacts of underwater noise and offshore wind energy developments on commercial fisheries (October 2022, [link](#))
- Briefing on the Maritime Area Planning Act Ireland 2021 on January 2023 ([link](#))
- Joint NWWAC/PelAC to the European Commission calling for increased policy coherence between environment and fisheries dimensions (June 2024, [link](#))
- NWWAC/PelAC submission on the Ecological Sensitivity Analysis of the Celtic Sea to inform future designation of Marine Protected Areas (MPAs) Report (December 2024, [link](#))
- NWWAC/PelAC Advice to the North Western Waters Member States group on renewable energy developments in the marine space, February 2025 ([link](#))
- NWWAC/PelAC webinar on EU fisheries and ORE developments, February 2025 ([link](#))
- NWWAC/PelAC Advice on the impact of Offshore Renewable Energy Developments on commercial fisheries, June 2025 ([link](#))

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. Therefore, the ACs regularly invite experts to dedicated meetings, and work carried out by Eklipse on the request put out by DG ENV was introduced to members of the

Advisory Councils (ACs) in January 2025 at the meeting of the joint Focus Group Spatial Dimension ([link](#)).

During the discussion, AC members expressed their appreciation for the robustness of the methodology and the process. However, it was generally felt that the main issue seemed to be the lack of robust science as well as the knowledge gaps on the impacts on the marine environment, and the resulting limitation regarding the possibility of drawing conclusions from insufficient evidence. AC members are pleased to see this identified in the draft report “*This report underscores the need for a comprehensive, long-term, and integrated approach to assessing and managing the impacts of offshore wind energy production at sea, including cumulative impacts on marine ecosystems. Significant gaps in knowledge persist and addressing these gaps through improved monitoring, cross disciplinary research, new and standardised assessment methodologies and adaptive policy frameworks will be essential to ensure that Good Environmental Status is achieved.*” It should be noted here that these shortcomings are inconsistent with the positive statements made elsewhere in the report.

The ambitious targets for development of offshore Marine Renewable Energy development will mean increasing competition for space particularly in nearshore waters. Construction and operation of marine renewable energy will have implications for almost all descriptors. The NWWAC notes that one of the key takeaways across all descriptors analysed in this project relates to knowledge gaps relating to impacts other than caused by fisheries. Fishing activity in European waters is extensively monitored and assessed; however, it is not the only human activity that can contribute (negatively or positively) towards the achievement of GES. A harmonised and equal approach to monitoring and assessing all commercial activities in the marine space must be implemented in order to arrive at a balanced evaluation. This must include quantification of the key economic effects on fisheries resulting from ORE development.

The Eklipse report suggests that offshore wind turbines can act as artificial reefs, attracting certain marine species to their foundations. However, this hypothesis is based on limited observations made after installation, with frequent gaps in baseline data on the initial ecological status. The reef effect, if it exists, remains very localised and does not allow us to conclude that there is a net increase in biomass or an overall benefit for fisheries.

Furthermore, the report highlights the major disruptive effects of underwater noise, particularly during the sinking of the foundations, which can cause many sensitive species to flee or become stressed. This results in a central contradiction: it is inconsistent to highlight the positive ecological role of wind turbines without taking into account these profound disturbances, which are often poorly quantified.

In the absence of rigorous pre- and post-installation monitoring and long-term follow-up, the supposed benefits remain highly speculative. The report acknowledges these shortcomings but persists in drawing positive conclusions. Such contradictions weaken the scientific rigour of the document and highlight the urgent need for more transparent and methodologically sound assessments.

A credible assessment of the ecological effects of offshore wind projects can only be based on ecological monitoring that includes baseline data prior to installation and continuous monitoring after installation. Otherwise, the positive or negative effects remain unquantifiable, and environmental assessments risk being arbitrary.

In addition, 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.

Ocean governance and climate change are interconnected, requiring engagement and dialogue between researchers, citizens, stakeholders and decision makers. The commercial fishing sector plays an important role in achieving the objectives of the deliverable (GES) for several descriptors, which only strengthens the view of the importance of inclusion of fisheries stakeholders in the management of the marine environment.

It is imperative to strengthen collaborations between the industry and science in order to develop a full picture of the state of environment and to understand the underlying premises for important and necessary trade-offs between nature conservation and resource utilisation.

Advisory Councils, though operating in the framework of the CFP, should be able to reach those environmental policy actors and departments whose work affects the implementation of CFP and the state of fisher communities and fisheries resources. Advisory Councils by default represent both, nature conservation advocates and the fisheries sector and their role should be recognised as overarching.

While the NWWAC understands that there have been occasions for stakeholder involvement in this project with additional opportunities over the next couple of months, calls for involvement were not strategically directed at the ACs which are representative and legitimate EU fisheries stakeholder bodies and legally recognised as organisations pursuing an aim of general European interest. Therefore, the NWWAC calls on DG ENV to recognise the Advisory Councils as strategic stakeholder bodies and increase direct communication regarding relevant work carried out in the marine space.

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