NWWAC ADVICE

On the Energy Transition Partnership for EU Fisheries and Aquaculture

19 June 2025

Background

The Energy Transition Partnership (ETP) for the EU fisheries and aquaculture sector, under the European Commission (DG MARE), hosted two hybrid workshops on 7 April 2025, entitled "Navigating the future of EU Fisheries through energy transition". The workshops focused on the energy transition and decarbonisation of Small-Scale Fisheries (SSCF), Large-Scale Fisheries (LSF) and Distant Water Fleet (DWF), involving representatives and stakeholders from the three key sectors, including the North Western Waters Advisory Council's (NWWAC) Secretariat.

These workshops aimed to:

- Assess progress: Present the current state of the Working Group's (WG) efforts on the energy transition roadmap.
- Analyse initial findings: Discuss preliminary results and identify synergies to refine recommendations and develop practical solutions for the fisheries and aquaculture sector.
- Showcase innovations and best practices: Highlight successful case studies to inspire replication and document future measures to speed up the energy transition of SSCF, LSF and DWF.

The contributions and active participation of attendees were instrumental to the success of the event and in shaping a set of draft recommendations. Following the meeting, ETP representatives invited further input to refine and expand these recommendations, encouraging participants to review and elaborate on them. The ETP representatives emphasised the importance of submitting this feedback to ensure that stakeholders' voices are reflected in the roadmap and to help guide the sector's transition towards climate neutrality by 2050. They also suggested that, when providing feedback, participants consider addressing aspects such as barriers, needs, key stakeholders, and scalability.

The North Western Waters Advisory Council has prepared a single piece of advice following the structure of the questionnaire they published online, in order to better reflect the vision of its members. However, due to the tight timeframe it is not possible to provide feedback on each recommendation put forward following the workshops, hence, the AC has included recommendations under each heading as put forward by the ETP.

The NWWAC would like to recall previous contributions made which are relevant to the content of this advice, specifically:

- NWWAC Workshop on the Impact of Climate Change on Fisheries in the North Western Water: examining policy, research and potential mitigation and adaptation strategies, 26 November 2020 (link) including separate report (link)
- NWWAC advice on the impact of Climate Change on fisheries in the North Western Waters, 12 May 2021 (link)
- NWWAC feedback on the initiative "CO2 emissions of engines – methodology for their reduction", 06 August 2021 (link)
- NWWAC response to the public consultation on the Energy Transition Partnership for EU fisheries and aquaculture, 15 September 2023 (link)
- NWWAC advice on the Communication from the Commission "On the Energy Transition of the EU Fisheries and Aquaculture sector" (COM(2032) 100 final (link)

The NWWAC reiterates that, as a primary sector, the fishing sector provides sustainable food to EU citizens with the lowest carbon footprint of all healthy and nutritious protein sources as recognised in the EU's Farm to Fork Strategy (link). The seafood supply chain also plays a vital part in the EU's food security, and the NWWAC calls on the Commission to highlight the importance of promoting seafood as part of sustainable, climate-neutral food consumption.

Since the inception of the Energy Transition Partnership, the NWWAC has participated in the work carried out across the platform, and members welcome the opportunity to contribute to the shaping of the recommendations for the development of the roadmap.

Of main importance to NWWAC members are the areas of small-scale fleets as well as large-scale fleets, and the following chapters address the blocks of recommendations made following the April workshops in more detail. The AC **strongly recommends** combining the work for these fleets into one forum under the Energy Transition Partnership. Therefore, the following recommendation should be read as pertaining to both small-scale fleet and large-scale fleet.

The following recommendations were raised in both the

- **ETP Workshop - Navigating the future of EU Fisheries through energy transition - Small Scale Coast Fisheries**
- **ETP Workshop - Navigating the future of EU Fisheries through energy transition Large Scale Fisheries and Distant Water Fleet**

and are therefore applicable to all.

a. Supporting innovations, research and infrastructure

NWWAC recommendation: further develop and implement green technologies and carbon-neutral fuels

The biggest challenge facing the industry is the development and global availability of alternative and innovative green technologies, as well as carbon-neutral fuels and energy sources. Proposals to intensify efforts in the production and deployment of such fuels and the necessary infrastructure is very much welcomed by the industry. This transition is not only vital to meet the EU's climate and decarbonisation targets, but also essential for ensuring the long-term economic viability and international competitiveness of the European fishing fleet. However, the transition to new propulsion technologies and alternative fuels requires re-configuration of vessel layout, larger space on board, and current capacity limitations of fishing vessels set in the CFP along with international rules on carbon emissions and pollution hinder such progress. The limitations in the CFP, originally designed to curb overfishing, now unintentionally restrict progress toward decarbonisation and safety improvements. Modern low- and zero-emission propulsion systems—such as electric engines, hydrogen tanks, or hybrid systems—require significantly more space and structural adjustments than traditional fuel setups. Without the flexibility to increase vessel capacity in cases where it is directly tied to energy efficiency and improved safety standards, the sector cannot make the investments needed to future-proof the fleet. Allowing targeted capacity increases for these purposes, under strict monitoring to avoid increases in fishing effort, would strike a necessary balance between sustainability and innovation.

NWWAC recommendation: further support innovation in vessel and gear design

The fisheries sector has made and continues to make significant efforts in improving vessel design and gear design in relation to reducing direct effects on the seabed. Alleviating the physical contact between the gear and the seabed is certainly going to reduce fuel consumption, which contributes both to lower emissions and more cost-efficient operations for fishers. However, these developments require significant financial investments in research, testing, and retrofitting. If the sector is to maintain momentum in gear innovation and vessel

optimisation, continued and enhanced support through targeted funding, regulatory flexibility, and knowledge-sharing frameworks is essential.

NWWAC recommendation: fleet modernisation and adaptation needs

The Opinion of the European Economic and Social Committee on 'Social dimension of fisheries' (exploratory opinion) (2020/C 14/09) notes that "the average age in years of ships in the European fleet is 23, with extreme cases such as Spain which still has more than 2500 vessels that are more than 40 years old". A recent update by the European Commission details the average age for vessels in the small-scale fleet at 38.6, for large-scale fleet at 35.6, and for the distant water fleet at 26.7 years[1]. The composite nature of the European fishing fleet suggests that the technological solutions that could be implemented for some fleets will not be able to meet the needs and constraints of all. In addition, the activities (and production) of the various European fleets are not interchangeable when it comes to the issues of food security and employment. Limitations regarding adaptation to new fuel sources also apply to any plans for fleet renovation and modernisation in order to guarantee on-board safety, better living conditions and the best possible working conditions for crews. From an economic perspective, it is highly questionable whether modernising a 35-year-old plus vessel to reduce carbon emissions represents a sound investment. At best, such improvements represent a "sticky plaster" approach that will yield only small returns in terms of reduced emissions. Support for new builds is urgently required if the European fleet is to meet ambitious targets set for decarbonisation.

NWWAC recommendation: improve shipyard capacity for decarbonisation and advancing decarbonisation technologies

On a European scale, if this decarbonisation were or could be implemented in a linear fashion to achieve carbon neutrality by 2050, almost 1500 fishing vessels a year would have to be renewed or adapted. However, there are currently not enough shipyards in Europe to adapt or build 1500 fishing vessels a year.[2] Technology that would support the decarbonisation of the sector is constantly developing and improving. Options include improvements in engine functioning and the use of different energy sources (solar, wind and hydrogen). LNG and hydrogen fuel-cell technologies seem to be the most promising alternatives. Quite a lot of activity is taking place worldwide in this regard. Such projects are good examples for the European sector to consider for future perspectives. Hydrogen technology could be a steppingstone towards a carbon free seafood industry but currently there is a lack of supply and storage facilities ashore. Electric power might be feasible for certain fleet segments, for

[1] Workshop on Navigating the future of EU Fisheries through energy transition - European Commission (link)
[2] NWWAC advice on the Communication from the Commission "On the Energy Transition of the EU Fisheries and Aquaculture sector" (COM(2032) 100 final (link)

example coastal, small-scale fleets but the technology is in its infancy for the fishing industry. (Please refer to NWWAC feedback on the initiative "CO2 emissions of engines – methodology for their reduction" for further contributions on the different technologies.)

NWWAC recommendation: integration of artificial intelligence (AI)

Artificial intelligence (AI) within the fisheries sector should be further developed and implemented, as it has the potential to significantly support the fisheries sector by easing the demanding nature of fishers' daily work while promoting energy efficiency and decarbonisation. Through smart technologies such as predictive analytics for weather and fish stock movements, AI can help optimise fishing routes, reducing fuel use and lowering emissions. Automated monitoring systems and onboard decision-support tools can also enhance safety, reduce manual tasks, and support compliance with sustainability regulations. By embracing AI-driven innovations, the sector can modernise operations, improve livelihoods, and contribute to a more resilient and environmentally responsible future for fisheries. To implement the use of this, adequate training and development of skills is essential.

However, it is important to note that AI is still in early stages of development for application on fishing vessels and has yet to be widely implemented in operational contexts. These systems require substantial training using relevant fisheries data, and questions remain around their energy consumption and data storage needs on board. While AI might ease the daily workload of fishers, it is not a replacement for human decision-making. Effective use of AI systems still relies on the fishers themselves, who must interpret and act on AI-generated insights. To implement the use of this, comprehensive support, including investment in user-friendly technologies, and adequate training and development of digital skills, is essential to ensure meaningful integration and long-term success.

NWWAC advice: improving refrigeration and cold chain efficiency

Regarding the promotion of energy-efficient on-board refrigeration technologies and cold chain logistics, the NWWAC notes that to lower the carbon footprint of processed seafood, fishing vessels could adopt energy-efficient on-board refrigeration technologies such as variable-speed compressors, advanced insulation materials, and solar-assisted cooling systems. These innovations significantly reduce fuel consumption while maintaining product quality. In parallel, optimising cold chain logistics—from landing ports to processing facilities—through real-time temperature monitoring, smart routing, and AI-based demand forecasting minimise spoilage, reduce energy use during transport, and streamline distribution.

While such innovations may ultimately lead to reduced operational costs and lower fuel consumption, the initial implementation requires serious upfront investment. Given the average age of the European fishing fleet, many vessels are not equipped to accommodate new systems without major modifications. For small- and medium-sized enterprises, these costs can be

prohibitive without targeted financial support, grant schemes, or incentives. Supporting these investments is crucial to ensure that energy-efficient practices become accessible and scalable across the sector, both across small and large-scale fisheries.

b. Closing the Skills and Knowledge Gaps

NWWAC recommendation: understanding fuel-efficiency for contribution to more efficient food production

Understanding the fuel efficiency and the food production efficiency of our fisheries is a key aspect to finding solutions. For wild capture fisheries, the actual food production efficiency, in terms of tonnes of landings per unit of fuel consumed to catch that food, compares very favourably to other forms of food production. For example, "Total carbon emissions for the Irish seafood sector are 396,207 tonnes CO2 eq. This total figure covers both catch fisheries and aquaculture segments. This represents 1.76% of emissions when compared to Irish agriculture emissions (2017-2019 average)."[3]

However, this is not a uniform picture and depends on the type of fishery. Having more detailed information about the efficiency across the different metiers in the fleet would help governments to target financial incentives and investments to improve particularly sectors of the fleet to help them meet the zero-carbon agenda.

In this regard it is essential to carry out a full analysis of the efforts and achievements across the various fleets in relation to efforts having been carried out and achievements made in increasing fuel efficiency over the past years. For example, the European fishing fleet achieved a reduction of fuel consumption by 50% since 1990[4] . A Community assessment of this kind is available on the United Nations Framework Convention on Climate Change (UNFCCC) website, which gives both the annual volumes of fuel delivered to fishing vessels (expressed in TJ) and the volumes of GHG emissions falling within the scope of the Climate Convention (CO2, CH4, N2O) for each reporting country. The Commission should make a better assessment of these existing data so that they can be taken into account when setting goals for a fair and just transition across all sectors.

NWWAC recommendation: technological innovation to attract young people and skills development to work for a modernised fleet

[3] Bord Iascaigh Mhara 2023: Carbon Footprint of the Irish Seafood Industry (link)
[4] Common Reporting Format tables (Convention) 2022 (table 1.A(a)s4), Party-authored reports: European Union, UNFCCC 2022 (link)

The energy transition of the fisheries sector requires new skills and qualifications given the new type of gears and technologies at stake. This has to be connected with the necessity to develop a strategy to ensure the generational renewal of the fisheries sector.

Training courses play a fundamental role in bridging the knowledge and skills gaps within the fishing sector, particularly as it moves toward modernisation and energy transition. Equipping fishers with practical knowledge on fuel-efficient technologies, sustainable fishing practices, digital tools and AI tools —such as navigation software, real-time data systems, and smart engine monitoring— as well as the financial means necessary to adapt can lead to more efficient operations and reduced environmental impact. Education is also essential to raise awareness among fishers about how their behaviour, such as decisions around vessel speed, route planning, and engine use, directly influences fuel consumption and overall efficiency. As the sector adopts more advanced and technology-driven solutions, the NWWAC believes that high-quality training becomes essential not only for upskilling the current workforce but also for attracting younger generations. A modern, innovative fisheries sector presents new career opportunities that align with young people's interest in sustainability, technology, and marine stewardship, helping to ensure generational renewal and long-term resilience.

To that end, the NWWAC refers to the recommendations made in its joint NWWAC/NSAC advice on social aspects in fisheries from 20 December 2022 (link), and specifically the support expressed for the European Parliament's resolution of 16 September 2021 on "Fishers for the future: Attracting a new generation of workers to the fishing industry and generating employment in coastal communities" (2019/2161(INI)). The AC asks the Commission to provide an update on if and how this resolution is being addressed, especially regarding "Better training and ensuring that training is recognised at EU level".

While we rightly argue for ecological sustainability, the energy transition, and economic impacts, it is equally important to consider the social dimension—ensuring that the transformation of the sector is fair, inclusive, and attentive to the impact on fishers and future generations. Social sustainability must be a cornerstone alongside environmental and economic goals, to safeguard livelihoods and maintain a resilient and cohesive sector during this period of profound change.

NWWAC recommendation: carry out a study to identify the investment required for fleet decarbonisation

To fully understand how investment can be directed towards decarbonising the European fishing fleet it is essential to put a figure on the overall investment effort that this will entail. However, this exercise seems never to have been undertaken, even though the European Commission usually indicates the costs and timetable for implementing the initiatives it proposes.

The current cost of building new vessels can be used as a first indication of the investment effort required to decarbonise these fleets; however, the costs as currently known do not correspond to the implementation of breakthrough propulsion technologies. Current investment costs for the construction of a new vessel vary greatly depending on the complexity of the vessel. Costs are often quoted at between €100,000 per metre in length and €160,000, in today's euros (bearing in mind that for large or complex vessels particularly those that process and/or freeze fish on board - these costs frequently rise to €500,000 per metre, or even more).

It can be estimated that the cost of renewing the entire European fishing fleet of vessels over 12m would be at least between 22 and 36 billion euros. This investment effort to be made between now and 2050 to achieve carbon neutrality, i.e., over 30 years, should be compared (2019 figures) with annual sales of the ships concerned of nearly €5.4 billion and EBITDA rates of between €550 million and €1 billion. The AC also points out that these projections do not take into account the cost of implementing new technologies, nor the risk taken as a result of this on what the medium-term market value of the first ships to be built might be.

NWWAC recommendation: overcome the limitations of current state aid and mobilise more funding for technological advancement

The framework for State Aid that can be granted to fishing companies prohibits all public aid for the construction and modernisation of vessels, and de minimis aid cannot be investment aid. It should also be noted that in the current context, many companies have already "used up" all or part of this aid, noting that for fisheries it is limited to between €30 – 40,000 per grantee depending on Member State.

The NWWAC believes that the EMFAF does not have the necessary scope to include this objective in that it remains limited to the repowering - subject to conditions - of vessels of less than 24 metres. Upgrading the engine on a fishing vessel can reduce greenhouse gas emissions by saving fuel, however, it is not deemed effective or efficient if the vessel itself is not efficient in terms of its other components or is too old to warrant such a significant investment.

These enhanced technologies require significant investments and funding to become a reality. Putting appropriate funding and financial instruments in place is fundamental to support the implementation of the ambitious set of actions foreseen and to ensure the resilience of the fishing sector. Clear funding possibilities and the provision of substantial financial resources are still lacking—yet they are essential to guarantee a just transition for the fisheries sector.

Investments in both research & development are critical, along with greater flexibility in existing funding mechanisms to allow for more efficient allocation of resources across Member States. Importantly, financial support must go beyond research and development: it must also actively fund the transition from research into practical application, including the deployment and adoption of new technologies on board. Moreover, fishers must be supported even after implementation, during the critical phase when they are learning how to operate and integrate

new systems into their daily practices. Without this continued support, uptake and long-term success will be at risk. It is vital that any decarbonisation objectives for the EU fleet take current limitations into account and ensure that business and finance opportunities are tailored to overcoming existing barriers. Financial instruments must support the adaptation and modernisation of the European fleet, potentially through the involvement of the European Investment Bank (EIB) to facilitate access to finance for fishing companies. The European Maritime Fisheries and Aquaculture Fund (EMFAF). Horizon Europe and other EU funds should also be mobilised to strengthen innovation and ensure that technological advancements can be widely adopted across the sector.

NWWAC recommendation: exclude fisheries from energy taxation directive

Finally, the NWWAC would like to reiterate its opposition to the inclusion of fisheries in the scope of the energy taxation directive. Any new taxation on fossil fuels will not lead to a transition towards decarbonisation. All it will do is penalise the sector, especially in light of current prices of fossil fuels (but also those of synthetic fuels), without the possibility to pass on the costs to customers. European fishing companies currently have no capacity to share their costs with companies in the marketing chain for their products, nor do they benefit from the possibility of significant financial support to invest and innovate.[5]

c. Regulations

NWWAC recommendation: revision of capacity limits to enable decarbonisation

The NWWAC recalls that regulatory constraints to the energy transition of EU fishing vessels also remains. The Common Fisheries Policy imposes limitations on the tonnage and power of EU vessels (capacity limit).

It is a shared opinion among fishing professionals that vessel tonnage capacity, as currently defined and regulated, is poorly suited to the energy transition challenge, particularly because the installation of alternative propulsion systems and energy-efficient technologies such as hybrid engines, batteries, hydrogen storage, or methanol tanks require additional space and structural adaptations. These innovations often lead to increased vessel volume and weight, even when fishing capacity remains unchanged and they minimise the sector's environmental footprint.

The framework for the capacities of fishing vessels as provided for by Regulation (EU) 1380/2013 is no longer adapted to today's technical, environmental and economic challenges. By freezing vessel structure through outdated technical criteria, the current capacity limits block meaningful adaptation—preventing vessels from becoming safer, cleaner, and more energy-

[5] NWWAC advice on the Communication from the Commission "On the Energy Transition of the EU Fisheries and Aquaculture sector" (COM(2032) 100 final (link)

efficient. The regulation inadvertently penalises those who aim to modernise and decarbonise. It is therefore imperative to review and amend the regulatory framework to reflect the realities of today and to remove administrative barriers to innovation and the implementation of new energy technologies.

This revision should explicitly accommodate the space, energy, and weight requirements of new energy technologies including hybridisation, methanol, ammonia, and H2. It should also consider the broader structural improvements needed for enhanced ship safety, operational stability, and the well-being of crews. Such adaptations are critical not only for improving energy performance, but also for boosting the attractiveness of the sector and supporting generational renewal and getting aligned with the EU's broader climate and sustainability goals. Furthermore, greater flexibility in vessel design is essential to ensure long-term food security and sovereignty, by future-proofing the fleet in a rapidly changing climate and market environment. As mentioned during the consultation on the evaluation of the CFP, social and economic aspects such as crew accommodation, onboard safety, working conditions, and sufficient storage capacity should not be treated as secondary—but as core considerations in vessel design and regulation.

NWWAC recommendation: ensure regulatory visibility for investment confidence

The NWWAC also points out the need for clear and stable regulatory visibility to build investment confidence in the fisheries sector and their energy transition. Significant investments in new technologies and fleet modernisation require a predictable, transparent, and long-term policy framework that reduces financial risks and supports planning. Without regulatory clarity and commitment, investor uncertainty grows, slowing the adoption of low-carbon solutions. Ensuring consistent regulations that protect early adopters and align with climate goals is essential to unlock the funding and innovation needed for a resilient, competitive, and sustainable EU fishing fleet.

NWWAC recommendation: respect regionalisation and local engagement

The NWWAC calls for any measures to respect and implement the principle of regionalisation. Fleet specific strategies should be prioritised and developed with the participation of local stakeholders to ensure that the proposed measures are useful and efficient. Given that fishing activities often cross national borders, it is essential that infrastructure, management, operational efficiency and support mechanisms are coordinated and accessible throughout the entire region to reflect the transboundary nature of fisheries and enhance overall effectiveness.

NWWAC recommendation: adapt the CFP for flexibility and coherence

Adaptability of the regulatory framework is essential to support the decarbonisation and modernisation of the fishing sector, especially as technologies and environmental challenges continue to evolve. While the Common Fisheries Policy (CFP) offers a solid foundation, its governance system must become more responsive and forward-looking. It is important to note that the current Technical Measures Regulation does not allow for innovations to be used. Prioritising the revision of CFP regulations to incorporate greater flexibility, stronger stakeholder engagement, and objective-driven policymaking will allow the sector to adopt innovative solutions, reduce emissions, and remain competitive[6]. Moreover, ensuring coherence with broader EU policies on energy efficiency – for example the FuelEU Maritime framework, maritime transport decarbonisation strategies or similar regulatory structure – is crucial. Aligning fisheries governance with these frameworks will strengthen the sector's contribution to the EU's environmental goals and ensure access to relevant funding and support measures.

NWWAC recommendation: ensure coexistence with other sectors of the blue economy through the EU Ocean Pact

The EU and its Member States must prioritise the integration and coherence of the Blue Economy framework with other relevant governance frameworks, such as international ocean governance, climate, and biodiversity strategies. While integration is vital, the current EU approach tends to favour isolated expert groups focused on individual aspects, such as the Marine Strategy Framework Directive (MSFD), the EU Biodiversity Strategy, Marine Spatial Planning, Offshore Renewable Energy objectives, Marine Protected Areas missions and fisheries management. While fishing pressure in the EU has decreased over the past years, pressure on the marine environment overall has increased due to the increased multiple use of the marine space by different actors, e.g. offshore renewable energy and other blue economy entrants. Effective coordination under Marine Spatial Planning (MSP) among all the parties involved is therefore essential for managing competition and potential conflicts between different sectors of the Blue Economy. Mechanisms must be established to ensure that the cumulative environmental impacts—both direct and indirect, as well as nationally and cross-border—of various activities within the Blue Economy do not exacerbate the pressures of climate change on the ocean or negatively affect specific sectors, such as fisheries, their value chains, and associated onshore activities.

For these reasons, the NWWAC welcomes the development of the EU Ocean Pact with its intention to addressing this fragmented approach, and to ensuring a more unified and coordinated effort across all sectors of the blue economy.[7]

[6] NWWAC advice on the evaluation of the CFP regulation (LINK)
[7] NWWAC Advice on the EU Ocean Pact (link)

NWWAC recommendation: share common goals in term of energy efficiency with non-EU countries importing in EU and consumer education

Furthermore, as the European fishing sector advances towards greater energy efficiency and decarbonisation, the NWWAC believes it is essential that in the future imported fish products are held to shared goals in terms of energy transition. Common goals would help prevent unfair competition from products originating in regions with lower environmental obligations, protecting both EU fishers and the integrity of sustainability efforts. This would also encourage global improvements in fishing practices and contribute to reducing the overall carbon footprint of the seafood supply chain. In parallel, educating consumers about the comparatively lower carbon footprint of seafood—particularly in relation to other animal-based proteins—will further support responsible markets and reinforce the EU's leadership in climate-conscious and ethical food production.

NWWAC recommendation: preparing for targeted consultation on decarbonisation

Finally, the NWWAC acknowledges that the Commission envisages the launch of a specific targeted consultation with Member States and Advisory Councils to prepare this initiative, as mentioned in the call for evidence. The NWWAC stands ready to further work on the topic with the support of experts to prepare its contribution.

The following recommendations were raised only in the

- **ETP Workshop - Navigating the future of EU Fisheries through energy transition Large Scale Fisheries and Distant Water Fleet**

but should also be applicable to the small-scale fleets.

NWWAC members reiterate that the recommendations made in relation to:

- Supporting innovations, research and infrastructure
- Closing the Skills and Knowledge Gaps
- Regulations

regarding the small-scale fleet made in the previous chapter are equally relevant to large scale fisheries and therefore should be considered the same.

d. Collaboration

NWWAC recommendation: ensure fair global competition in the energy transition

The NWWAC supports the sustainable development of the whole fisheries production chain, and its members are keenly interested in developments and improvements regarding a just and practical energy transition. However, it is vital to ensure the fair competition between the EU seafood sector and third countries' producers. While the Commission aims to "advocate for raising the level of ambition on reducing GHG emissions in the IMO strategy, in combination with a global GHG fuel standard with a market-based measure for renewable, low and zero GHG-fuels", as well as to "promote work and exchanges of best practice on the energy transition for the fisheries and aquaculture sector in international organisations (e.g. OECD, IMO, FAO)", it is feared that the level of ambition in other countries for achieving similar targets regarding energy transition in their respective seafood sectors will not match the EU ambition. If the global sector does not equally share the high environmental, social, skills and labour standards which the EU fishing sector is subject to, the latter's competitiveness will be undermined.

The EU's efforts in promoting an international energy transition must be part of the development and implementation of a comprehensive strategy for improved global oceans and fisheries governance based on the three pillars of sustainability and with full consideration of the Sustainable Development Goals. A level playing field regarding environmentally sustainable fisheries and socially responsible value chains can only be achieved through a holistic political

approach within the existing international governance framework as well as the EU's commitment to policy coherence[8] and rules-based global order.[9]

NWWAC recommendation: caution on the co-location of Offshore Wind and fishing activities

In relation to the noted recommendation "Enable the co-location of offshore wind farms and energy storage systems with fishing activities, allowing fleets to benefit from clean energy sources", NWWAC members wish to draw attention to the extensive work this AC has carried out on the topic of offshore renewable energy developments[10]. There is currently no evidence that a co-location of offshore wind farms and energy storage systems benefits the fishing industry in any way. Moreover, the idea that fishing vessels could charge at offshore wind farms has been suggested as one of the lines of thought during ETP workshops. However, this concept is not currently feasible: there is no existing infrastructure, and neither the legal nor technical frameworks support the deployment of batteries capable of supplying sufficient energy to large-scale or distant-water fishing vessels. Promoting this idea under current conditions raises serious operational and safety concerns.

In this context, consideration should also be given to the ICES 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 Sea[11]. NWWAC members strongly advise removing this recommendation unless this is supported by concrete scientific evidence.

NWWAC recommendation: promote constructive collaboration with the ORE sector

Furthermore, to support the energy transition and promote mutual benefits, the NWWAC recommends enhancing fisheries stakeholders' involvement and collaboration between the fisheries sector and the ORE industry. Constructive engagement can help reduce spatial

[8] https://international-partnerships.ec.europa.eu/policies/european-development-policy/policy-coherence-development_en

[9] https://www.eeas.europa.eu/sites/default/files/en_strategy_on_strengthening_the_eus_contribution_to_rules-based_multilateralism.pdf

[10] NWWAC/PELAC/NSAC advice for a non-recurrent request to ICES on impacts of wind energy developments 04 November 2020
Report from the NWWAC/PelAC workshop on the impacts of seismic and offshore wind energy developments on commercial fisheries 25 July 2022
Joint NWWAC/PelAC advice on the impacts of underwater noise and offshore wind energy developments on commercial fisheries 11 October 2022
NWWAC response to the public consultation on the draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy (DMAP) 14 June 2024
Joint NWWAC/PelAC advice to the NWW Member States on renewable energy developments in the marine space 17 February 2025
NWWAC/PelAC Webinar on EU fisheries and ORE developments 25 February 2025

[11] Report of the ICES Advisory Committee, 2025. ICES Advice 2025, sr.2025.03. (link)

conflicts and foster synergies, particularly in coastal areas where infrastructure overlaps. The fisheries sector could benefit directly from improved port facilities, renewable energy hubs, and the development of clean fuel supply centres, enabling fleets to access and utilise clean energy sources. By ensuring that fisheries interests are considered in the planning and implementation of offshore energy projects, this collaboration can contribute to a more sustainable, inclusive, and integrated blue economy in line with the EU's climate and energy objectives.

NWWAC recommendation: build trust and engagement for a resilient fisheries sector

In conclusion, in the context of decarbonisation, modernisation, and evolving marine policies, strengthening trust among fishing operators is fundamental. The NWWAC believes that clear communication, transparency in decision-making, and inclusive stakeholder engagement are key to ensuring that fishers feel heard, respected, and actively involved in shaping the future of their sector. Trust fosters collaboration, encourages the uptake of new technologies and practices, and reduces resistance to change. Building a culture of collaboration—between fishers, policymakers, scientists, and industry partners—is essential to deliver effective, fair, and lasting solutions for a sustainable and resilient fisheries sector.

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