

Ms Charlina Vitcheva
Director-General for Maritime Affairs and Fisheries
European Commission
Jozef II-straat 99
1000 Brussels
Belgium

Dun Laoghaire, Zoetermeer, 20 June 2024

Dear Ms Vitcheva,

Subject: Call for increased policy coherence between environment and fisheries dimensions

In 2023 the North Western Waters Advisory Council (NWWAC) and the Pelagic Advisory Council (PelAC) came together to set up a joint Focus Group on impacts from ORE developments and conservation site designations (FG Spatial Dimension) to continue their collaboration on aspects relating to potential impacts from offshore renewable energy developments and to address the ‘spatial squeeze’ experienced increasingly by the fishing industry as well as other users of marine resources in the European Union.

Potential impacts from offshore renewable energy (ORE) developments fall into various categories as identified especially in the joint submission from 11 October 2022 ([link](#)). The ‘spatial squeeze’ due to the number and extent of site applications is of great concern to the ACs. This is compounded by the fact that the EU Biodiversity Strategy sets the target of protecting 30% of EU land and sea by 2030 potentially leading to further displacement and closure of EU fisheries. Improved coordination between fisheries management and maritime spatial planning processes is urgently needed. This was also acknowledged by the Commission in their Communication on the CFP (SWD(2023) 103 final), published in February 2023 while simultaneously calling for a phasing out of all mobile bottom fishing in MPAs (COM(2023) 102 final) in line with the objectives of the Marine Strategy Framework Directive and the proposed Nature Restoration Law.

To address the increased pressure on marine ecosystems, the creation of competition and potential conflicts between various uses, effective coordination is required under marine spatial planning (MSP). Mechanisms must be put in place to ensure that direct and indirect cumulative environmental effects of activities of the Blue Economy do not add to the pressure from climate change on the ocean or adversely impact one specific sector, for example fisheries, their value chains, and on-shore activities. The EU and its Member States should promote the integration and ensure the coherence of the Blue Economy framework with other relevant governance frameworks such as for international ocean governance, climate and biodiversity.



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North Western Waters Advisory Council
Dun Laoghaire, Ireland

Pelagic Advisory Council
Zoetermeer, The Netherlands

Tel: +353 1 2144 143
E-mail: mo.mathies@nwwac.ie

Tel: +31 6 3375 6324
E-Mail: m.barbosa@pelagic-ac.org

This integration is vital, however, the current approach in the EU still seems to favour expert groups specifically set up to address one specific aspect, for example MSFD (Marine Strategy Coordination Group), the EU Biodiversity Strategy (Marine Expert Group), MSP, fisheries management, and working individually and separately from each other. Regular coordination between these groups is essential for the Blue Economy to become truly sustainable from an environmental, economic and social perspective, but also taking into consideration cultural and heritage aspects. Nonetheless, following the Marine Action Plan, a Special Group was created to gather the environment and fisheries Member States' and Commission's administrations with the aim of breaking the silo between the two.

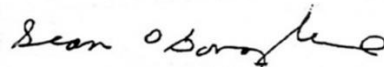
PelAC and NWWAC would like to suggest the same approach used by the Commission for the Special Group to be applied to the other expert groups as they all have consequences on fisheries and maritime spatial planning. If this is not feasible, the ACs would like to request access to the relevant expert groups so that members' input can be directly heard on these important issues.

Thank you for your attention on this matter, we look forward to your feedback.

Yours sincerely,



Emiel Brouckaert
Chairman of the NWWAC



Sean O'Donoghue
Chairman of the PelAC

