



Renewable Energy and European Marine Protected Areas

WWF Europe position paper

June 2019

Headline position

1. Climate change is the most fundamental threat to marine ecosystems around the world. As a result, sea levels are rising and oceans are getting warmer, risking the future of marine biodiversity¹. Across Europe as elsewhere, a radical shift towards a 100% renewable energy system based mainly on wind and solar is needed as we move away from fossil fuels and towards a zero-carbon energy future.
2. At the same time, an ecological network of well-managed Marine Protected Areas (MPAs) is essential to ensure that European seas are resilient enough to cope with the impacts of climate change and that their ecosystems are restored to a healthy state.
3. WWF advocates that future locations for renewable energy generation should be placed in principle outside MPAs² and other ecologically valuable areas. Effective, ecosystem-based Marine Spatial Planning (MSP) and strategic environmental assessments should ensure that renewable energy is not deployed in those areas that contain habitats, species and/or ecological processes that are particularly sensitive to its impacts, whether during construction, operation or decommissioning.

Context

4. Climate change is today's greatest threat to people and nature. Subsequent changes in ocean processes have profound impacts upon all life on Earth, including protected species and habitats. Therefore, expanding renewables at sea in harmony with nature is essential to avoid long-term impacts on marine ecosystems.
5. Ecologically coherent networks of well-managed MPAs are one of the best available tools to protect habitats and species in the face of the profound changes already taking place. These MPAs should be more than the sum of their parts, protecting all aspects of the marine environment,

¹ To give one example, if global temperature rises with 2°C we will face major loss of coral reefs including extinction of several coral species and triggering a knock-off effect of species loss.

² MPAs include in particular nationally designated nature reserves and protected areas, Natura 2000 areas, Ramsar sites and Regional Sea Convention MPAs. Areas designated as Important Bird Areas (IBAs), Ecologically or Biologically Significant Marine Areas (EBSAs) and other nationally or internationally recognized marine areas of particular scientific interest should be also taken into account where feasible.

from charismatic mobile species, such as fish, seabirds and marine mammals, to offshore habitats and sessile habitat-forming species. The European MPA network must account for the expected effects of climate change, by for example planning for MPAs to be adaptive and include climate refugia to accommodate spatial changes in the distribution of species and habitats. Ensuring a well-managed European MPA network is thus vital for the conservation of marine ecosystems.

6. Clear rules of avoidance of renewable development in any MPA network removes uncertainty for developers and reduces conflicts between users and stakeholders. A well-defined, well-designed and well-managed MPA network benefits both project investors and biodiversity as it officially recognises that certain areas need particular care and attention while delivering a [Sustainable Blue Economy](#) and providing the necessary ecosystem services for functioning healthy seas.

Long-term spatial vision is urgently needed

7. Given that sea space is limited, a systematic, strategic and smart site selection for renewables based on clear environmental criteria is essential. It is of the utmost importance that negative impacts to nature, such as underwater noise, electromagnetic disturbance, collision risks, chemical pollution and seafloor alteration, are avoided by selecting only suitable locations, outside ecologically valuable areas, for the development of renewable energies.
8. Project level assessment alone is not sufficient to deliver the reduction of cumulative pressures and restoration of the marine environment that are both needed to reach [Good Environmental Status](#) and conservation objectives in MPAs³. Project level assessment are primarily designed to avoid or reduce negative impacts on protected sites and more fundamental impacts of inappropriate strategic zoning of human activity are also required.
9. Forward-thinking, ecosystem-based MSP is therefore essential to proactively allocate space for generating renewable energy away from marine ecosystems that are most sensitive to their harmful impacts. Where MPAs protect habitats or species known to be sensitive to renewables deployment, either during construction, operation or decommissioning, this must be taken into account when allocating space for such activities. Ecosystem-based MSP also helps reduce the risk of conflicts amongst users of marine space, such as ship collisions and associated pollution risks, i.e. by establishing buffer zones between the different marine areas and activities.
10. Ecosystem-based MSP must be an iterative process relying on long-term monitoring to support research before, during and after renewable deployment, to identify and prevent cumulative impacts and to adapt marine space use across time. Therefore, adequate funding must be provisioned for the entire life cycle of a renewable deployment project: from the first

³ As committed to by all EU Member States in the Birds and Habitat Directives.

environmental impact assessment before any building activity starts until the end of the decommissioning process.

11. Systematic and strong strategic environmental assessment should support identifying future locations for deploying renewables, where environmental constraints as well as technical resource opportunities are considered and avoidance of cumulative impacts are given priority.
12. Coordination across borders is essential. The deployment and interconnection of renewable energy sources requires a sea-basin scale view, consideration of mobile species which may be affected by the cumulative impacts of large-scale development, as well as minimizing the harmful impacts of the energy grid by avoiding unnecessary sprawl of cables on the seafloor and cables crossing protected areas. All countries sharing a sea space need to work together to deliver a common MSP vision for (active) nature protection and sustainable use of ocean resources, in line with the United Nations 2030 [Sustainable Development Goals \(SDGs\)](#) and using the [WWF principles for a Sustainable Blue Economy](#). A well-managed network of MPAs is an essential part of this vision, providing the backbone to healthy, well-functioning marine ecosystems.

Dealing with short-term realities

13. In those countries where renewable energy deployments are already operational within MPAs, or where requests for environmental permits for renewables have already been submitted to the authorities, the environmental impacts of these developments must be robustly assessed on a case-by-case basis according to the relevant nature conservation legislation. A precautionary approach to mitigate negative impacts and ensure that site conservation objectives are met must be a basic requirement. Developing clear definitions of which activities are allowed to users and stakeholders is also part of this mitigation process.
14. Where projects of renewable development within MPA have received consent and been built, monitoring of impacts at all stages of the project, including decommissioning, must be carried out and the information must be publicly available, so that future projects can learn the lessons of previous developments. This is especially important for new technologies, for which the environmental impacts are less studied, and therefore less well known.
15. Technical solutions to reduce the impacts of renewable projects on the marine environment are urgently needed to ensure that we can achieve large scale renewable developments in a nature friendly way, avoiding negative impacts and where possible incorporating biodiversity benefits. This includes, but is not limited to, the use of less invasive, lower-energy or lower noise-level construction techniques to reduce impacts on marine species, particularly for the ones sensitive to noise. Collision risks for bats and migratory birds as well as overall displacement and barrier effects for seabirds are also to be monitored and avoided.

16. WWF will work with developers, regulators, planners and scientists across Europe to deliver a future where we are free from the dependence on fossil fuels, and where marine biodiversity is protected and restored. This is not an either-or choice: an increase in both effective marine protection and renewable energy is essential, and WWF will continue to play an active role in finding positive strategic solutions to ensure the sustainable use of the marine environment.