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Updated North Atlantic – Western Channel Coastal Strategy

Environmental statement
Pursuant to Article L. 122-9 of the French Environment Code

November 2025

Summary

I. Background

1. General framework for updating coastal strategies

Maritime planning is the process by which the State analyses and organises human activities at sea from an ecological, economic and social perspective. It is developed in consultation with sea users and the public.

The European Union has addressed this issue through a framework directive dedicated to maritime spatial planning (MSPD - 2014)[1] , which complements the Marine Strategy Framework Directive (MSFD - 2008)[2] , which aims to maintain or restore the proper functioning of marine ecosystems while allowing future generations to continue using the sea in a sustainable manner. These two directives have been transposed into French law and provide a legal framework for maritime planning.

At the national level, maritime planning is guided by the National Strategy for the Sea and Coastline (SNML) 2024-2030, adopted by decree on 10 June 2024. Setting out the general framework for French maritime policy, it is the result of interministerial work, in consultation with maritime stakeholders under the aegis of the National Council for the Sea and Coastline (CNML), half of whose members are elected representatives and half are representatives of public institutions, businesses, nationally representative trade unions, and associations and foundations.

At the level of each metropolitan coastline – Eastern Channel-North Sea, North Atlantic-Western Channel (NAMO), South Atlantic and Mediterranean – Planning is defined by a strategic coastal document (DSF). Responsibility for drafting this document lies with the coordinating prefects (regional coordinating prefect and maritime prefect), who are supported by a single consultative body, the Maritime Coastal Council (CMF), which provides a forum for discussion between the various stakeholders involved in maritime, coastal and land-based activities. At the national level, the work is coordinated by the ministries responsible for the sea, the environment and energy.

oted at different times and updated every six years: the strategic part, known as the "coastal strategy" (SFM), and the operational part. After an initial cycle of developing the DSFs

[1]Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning.

[2] Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for Community action in the field of marine environmental policy.

Conducted between 2019 and 2022, their strategic component has been undergoing an update since 2022: this was the subject of the electronic public participation (PPVE) process, which is summarised in this document.

Coastal strategies consist of a description of the current situation along the coastline, including an assessment of maritime activities and uses, as well as the ecological state of the marine environment and related issues. They also include guidelines and objectives that define the conditions and rules for the spatial and temporal coexistence of activities and uses and aim to reduce the pressures exerted by human activities on the marine environment to levels compatible with maintaining and achieving good environmental status (GES) in marine waters.

Now, pursuant to Law No. 2023-175 of 10 March 2023 on accelerating renewable energy production (APER), these strategies include a map of priority areas for offshore wind energy development over the next 10 years and by 2050.

The updated coastal strategies also include a development path for strong offshore protection (defined by Decree No. 2022-527 of 12 April 2022) with a view to achieving the surface targets set for each coastline and expressed as a percentage of coastline coverage (1% in the Eastern Channel-North Sea, 3% in the North Atlantic-Western Channel, 3% in the South Atlantic and 5% in the Mediterranean) by 2027 and at the level of metropolitan waters (5%) by 2030 in accordance with the SNML.

The coastal strategies are supplemented by an operational component, including a monitoring system and an action plan, which will be developed at a later stage.

Pursuant to the European Directive of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, all plans and programmes likely to have a significant impact on the environment and setting the framework for subsequent decisions on development and construction projects must be subject to an environmental assessment. DSFs are subject to environmental assessment in accordance with Article R.122-10 of the Environment Code. The environmental assessment process for a plan (defined in L122-4 of the Environment Code) has three objectives:

- to assist in the development of the plan by taking into account all areas of and identifying its effects on the environment;
- contribute to providing the public with accurate information and facilitate its participation in the decision-making process for developing the programme. The aim is to ensure transparency regarding the difficulties encountered, particularly knowledge gaps, in order to highlight the limitations of the plan, not with a view to undermining it, but to provide the public with better information on the choices made and how it has evolved during its revision;
- inform the administrative authority responsible for adopting the plan on the decision to be taken.

As part of this assessment, an environmental report was drawn up and attached to the draft Coastal Strategy.

2. Timeline and stages for updating coastal strategies

The DSFs are developed through an iterative and progressive process. Updating their strategic component

strategic component was carried out in several stages.

- **Since 2022:** the update of the coastal strategies adopted in 2019 began in 2022 in line with the energy programming schedule.
- **From November 2023 to April 2024:** for the first time, the updating of the DSFs was carried out the subject **of a public debate entitled "La mer en débat" (**The **Sea in Debate**), led by the National Commission for

  (CNDP), shared with offshore wind planning, in

  application of the new framework permitted by the APER law.
- **From May 2024 to October 2024:** the public debate resulted in a review and report, published by the CNDP on 26 June 2024. Following a consultation phase

  In consultation with stakeholders in the maritime sector, the government drew conclusions from the public debate on 17 October 2024 through a ministerial decision accompanied by a report from the project owners in response to the CNDP's report.
- **December 2024:**
  - On 11 December, the CNDP issued opinions on the update of the strategic documents on the coastline and offshore wind power for the four coastlines, noting that "the clarifications provided by the project owners in response to the public's questions, comments and proposals are sufficiently comprehensive to initiate ongoing consultation".
  - The Environmental Authority was consulted at the end of December on the basis of the draft coastal strategy and the environmental impact assessment report, which was finalised following the public debate and consultations that followed. It issued its opinion **on 13 March 2025**.
- **From December 2024 to April 2025:**
  - In order to ensure that the public is well informed and involved between the public debate "La mer en débat" (The Sea in Debate) and the current electronic public participation process, an intermediate phase of ongoing consultation has been set up. Working meetings and webinars have been organised at national level and along the coast.
  - On 28 April, the CNDP guarantors for this consultation submitted their report.
- **May to August 2025**:
  - Public participation via electronic means took place **from 5 May to 5 August 2025**, with the aim of gathering public opinion on the draft coastal strategies.
  - **Between May and August 2025**, various authorities were consulted in accordance with the Environment Code (R.219-1-10), as were neighbouring countries, particularly under the Espoo Convention and the aforementioned directives.
- **From August to October 2025**: the report environmental, the opinion of the Environmental Authority

  , as well as contributions from the public, neighbouring countries and authorities, were processed in order to finalise the coastal strategy with a view to its adoption. They will also inform the development of the operational part.
- **The NAMO SFM was adopted on 25 November 2025.**

With regard to offshore wind power, the aim is to launch an initial competitive tendering procedure (call for tenders No. 10) within the priority areas identified in the interministerial decision of 17 October 2024, with the aim of awarding projects by the end of 2026. This timetable assumes that the final specifications for AO10 will be published in early 2026.

3. Declaration pursuant to Article L.122-9 of the Environmental Code

In accordance with Articles L.122-4 and R.121-1-1 of the Environment Code, DSFs are subject to environmental assessment. They must therefore be the subject of a report "*which identifies, describes and assesses the significant effects that the implementation of the plan or programme may have on the environment, as well as reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. This report presents the measures planned to avoid any significant negative effects that the implementation of the plan or programme may have on the environment, the measures planned to reduce those that cannot be avoided, and the measures planned to compensate for those that cannot be avoided or reduced. It sets out the other solutions considered and the reasons why, particularly from an environmental protection perspective, the project was chosen. It defines the criteria, indicators and methods chosen to monitor the effects of the plan or programme on the environment in order to identify, in particular, at an early stage, any unforeseen negative impacts and, if necessary, consider appropriate measures*" (Article L.122-6 of the Environment Code). The draft document and this report are sent to the environmental authority for its opinion: the competent authority for DSFs is the General Inspectorate for the Environment and Sustainable Development (IGEDD).

Where the plan or programme is likely to have significant effects on the environment of another Member State of the European Union, it shall be forwarded, together with the environmental report, to the authorities of the States concerned, which may give their opinion (Article L.122-8 of the Environment Code).

Pursuant to Article L.122-9 of the Environment Code, once the plan/programme has been adopted, the competent authority shall:
"*Inform the public, the environmental authority and, where applicable, the authorities of other European Union Member States consulted. It shall make the following information available to them:*

1° The plan or programme; 2° A statement summarising:

- *how the report drawn up pursuant to Article L. 122-6 and the consultations carried out have been taken into account;*
- *the reasons for the choices made in the plan or document, taking into account the various solutions considered;*
- *the measures intended to assess the environmental impact of implementation.*

of *the plan or programme.*

This is the purpose of this document, which has been drawn up for the SFMs of each of the maritime fronts.

II. Taking environmental assessment into account

1. Environmental assessment procedures

For the production of the environmental report, a project management assistance contract was concluded with a service provider. Project management was provided by the Water and Biodiversity Directorate (DEB), in conjunction with the Directorate-General for Maritime Affairs, Fisheries and Aquaculture (DGAMPA) and the Directorate-General for Energy and Climate (DGEC) of the Ministry of Ecology, as well as the Interregional Directorates for the Sea (DIRM).

The integration of offshore wind planning into SFMs was a new development that had to be taken into account in the environmental assessment exercise. To this end, dedicated service providers were brought in to produce information relating to offshore wind power (led by the Directorate-General for Energy and Climate) and onshore connections (led by RTE), to be included in the overall report.

The environmental report was produced over a nine-month period between March and December 2024.

In order to obtain methodological recommendations for carrying out the environmental assessment, a request for preliminary guidance was submitted to the Environmental Authority (EA), which was forwarded on 14 June 2024.

The service providers were thus able to follow the work to update the coastal strategies by participating in various internal meetings with government departments and stakeholders, both at national level and along the coast, in order to inform their work.

2. Summary of the Environmental Authority's opinion

The Ae was consulted on the SFM NAMO project on 19 December 2024 and issued its opinion on 13 March
2025[3].

Of the 21 recommendations made in this opinion, some relate to the strategic environmental assessment (SEA), which cannot be modified *retrospectively*. However, they may be taken into account to enhance the SEA for future update cycles.

Other recommendations are national in scope, and the responses provided were coordinated with central government departments or refer to national planning documents or public policies.

Finally, some of the EA's recommendations have led to changes in the deliverables, or to the details provided below. In addition to these formal recommendations, to which this section is intended to respond, discussions between EA inspectors and government departments have made it possible to pre-identify a number of adjustments to be made to the SFM, particularly in terms of the document's readability and educational value.

[3] Available here: https://www.dirm.nord-atlantique-manche-ouest.developpement-durable.gouv.fr/IMG/pdf/avis_ae_smf_namo_cle17f1b1.pdf

3. Consideration of the Environmental Authority's recommendations

The recommendations of the Environmental Authority are listed below, along with the actions taken in response to them.

The EA recommends describing the guidelines aimed at making the system for monitoring/assessing the environmental effects of the DSF more operational and explaining how this increased operational capacity is reflected in the strategic component.

The monitoring system is part of the operational component of the DSF. Its robustness is based on the indicators adopted in the strategic component, which this update has made it possible to evaluate and strengthen.

To this end, work was carried out to operationalise the strategic environmental objectives (SOs) by the departments, assessing and then refining the objectives and indicators that could not be completed in the first cycle of the DSF (lack of methodology or structure for monitoring, unavailable data, etc.). This work also drew on proposals made during the various phases of debate, consultation and public and institutional consultation. The descriptive sheets, illustrating their operational nature, are available in Appendix 6a.

The Ae recommends continuing the effort to implement quantitative and precise targets for environmental objectives and to banish indicators whose target is compliance with regulations in favour of indicators concerning the intensity and effectiveness of monitoring such compliance and the effectiveness of the regulations.

Due to its comprehensive nature, the DSF incorporates regulations applicable in the context of other public policies, hence the inclusion of indicators referring to them. However, most of the indicators go beyond the strict application of the regulations.

In light of this recommendation and the proposals made during consultations, one indicator was modified and three new indicators were added to SFM 2, bringing the total number of indicators to 88, including:

- 1 indicator on compliance with regulations governing the approach to and disturbance of (D01-MT-OE01);
- one provides an operational environmental objective (D07-OE04), as it there was no indicator in the previous cycle;
- 1 is linked to a DSF action concerning the reduction of coastal waste dumps, and will enable the environmental objective (D10-OE01) and the action to be assessed.

These adjustments to the indicators are accompanied by two more quantitative targets, *ultimately* enabling an effective assessment of compliance with the environmental objectives.

In addition, the titles of three environmental objectives have been clarified in order to provide a better understanding of their scope.

In anticipation of the next cycle, consideration has also been given to other control indicators in relation to plans and development projects, in order to assess the effectiveness of control rather than mere compliance with regulations. Control reporting mechanisms will be defined and implemented in the future.

The Ae recommends supplementing the presentation of socio-economic objectives by indicating their targets, initial values and the data sources used to inform them.

The DCPEM does not require targets to be set for socio-economic objectives (OSE). Although the issue was raised in relation to national administrations, it was decided not to proceed with this identification for this cycle. The monitoring system, which includes data sources and the method used to calculate or produce the indicator, is part of the operational component of the DSF. This information will therefore be included in the DSF, which will be updated in 2027.

The Ae recommends evaluating the effectiveness of management measures aimed at preserving environmental issues defined and implemented under the DOGGM since its entry into force.

The NAMO guidance document for the sustainable management of marine aggregates (DOGGM) does not provide for any new authorisations or extraction permits. These provisions help to limit pressure on the marine environment. In any case, the operating conditions for extraction sites are subject to a prior impact assessment and prefectural authorisation, which requires environmental monitoring to adapt these conditions if necessary.

Furthermore, several provisions of the DOGGM are included in the DSF action plan currently being implemented (such as the ongoing completion of a supplementary study on alternative resources derived from recycling, for example, for silica sand).

The Ae emphasises that the SEA indicates that the assessment of good ecological status and the precise knowledge
of pressures are subject to numerous uncertainties.

While many uncertainties remain, it is important to remember the role of the DSF in acquiring knowledge, ensuring the consistency of protection tools and coordinating the development of sustainable activities.

As noted in SFM Cycle 2, in France, assessments of the ecological status of marine waters are carried out by several scientific organisations based on the 11 descriptors of the MSFD. The scientific outputs are summarised in reports setting out the main conclusions and are included in the FSDs (for the NAMO MSFD, in the summary document and Annexes 2a and 2b). This six-yearly assessment increases knowledge by refining assessment methods and deploying research resources on the least well-documented descriptor compartments. An improvement in the assessment of the BEE and pressures should also be highlighted since the ^{first}cycle of the MSFD.

The acquisition of knowledge is also highlighted as a major challenge for SFM and is the subject of a dedicated socio-economic strategic objective ("Exploring the sea") which has a specific goal of "*improving knowledge of marine environments along the entire coastline* [...] *and knowledge of the impacts of human activities and the potential effects of climate change*".

This should also be viewed in the context of studies conducted at national level within
within the framework of the Offshore Wind Observatory, for example.

The EA recommends incorporating analyses of per- and polyfluoroalkyl substances into the "Contaminants" determinant.

As part of the harmonised WFD/MSFD assessment, PFOS are now assessed at sea in the main bivalve molluscs intended for human consumption (*Mytilus edulis*, *Mytilus galloprovincialis*, *Magallana gigas*). These substances are also monitored offshore in fish.

The EA recommends making the scenario for the likely evolution of the environment in the absence of MSFD more specific.

Maritime planning, via the DSFs, has the dual objective of achieving or maintaining good ecological status (MSFD) and ensuring the coexistence of sustainable maritime activities in order to provide visibility for the sectors (DCPEM).

Without DSF, planning would be on a tighter scale, thus increasing
the following risks:

- No initial assessment of the environment and heritage, economic and social status of territories sharing a common maritime identity (extensive habitats, mobile species, mobile and/or interdependent economic activities);
- Lack of integrated or thematic mapping at the scale of these territories;
- Lack of overall awareness of these dimensions by all stakeholders and bodies involved in dialogue, which are more complex to mobilise;
- Lack of common objectives to achieve a desirable future shared by stakeholders on the coast (Vision for 2050);
- On the environmental side: difficulties in taking ecosystem dynamics into account, increased pressures (cumulative impacts, degradation, fragmentation and habitat loss, etc.);
- On the socio-economic side: increased conflicts of use, legal uncertainty for professionals and users, increased recourse to litigation;
- Difficulties in coordinating the development of offshore wind power and the deployment of strong protection measures.

In general, a lack of planning via the DSF would lead to overall inaction, undermining the BEE objective for marine waters and preventing the coordinated development of sustainable activities at sea.

The impact analysis needs to be supplemented with regard to the development of certain activities and uses, and clarified in particular with regard to the expected contributions to improving the state of the environment.

This recommendation concerns a component of the SEA whose methodology was developed by the consulting firm and whose document cannot be modified *retrospectively*. This recommendation may be taken into account to improve the SEA for future update cycles.

However, it directly echoes the assessment of the achievement of the OEs, in particular through the implementation of the DSF action plan. Several environmental and socio-economic actions are aimed at "improving the state of the environment", such as:

- action D01-OM-OE01-AN1, in particular sub-action 4, which aims to adopt adequate regulatory measures to reduce accidental catches;
- action DE-OSE-VII-2-AF2, in particular sub-action 3, which aims to establish anchorage areas and light equipment (ZMELs).

The Ae recommends supplementing the analysis of the impacts of fishing, aquaculture and aggregate extraction on environmental issues.

The matrix included in the SFM summary document (part 1, §8) identifies the main pressures exerted by activities on the environment. Annex 1, which provides a detailed description of activities and uses of the maritime and coastal area, specifies, for each activity, its interactions with the marine environment and other uses. Interactions with the environment are understood in terms of pressures and impacts, but also in terms of potential dependence.

The EA report fails to mention that the NAMO DSF imposes a limit on aggregate extraction to the volumes currently authorised.

The EA recommends clarifying the first stage of characterising the environmental objectives that led to their classification as "ambitious" and "non-ambitious". It recommends specifying the level of reliability of the impact assessment in view of the incomplete or uncertain data on the initial state of the environments, as well as the expected contribution of each objective to improving the state of the environments.

This recommendation concerns a component of the SEA whose method was developed by the consulting firm and whose document cannot be modified *retrospectively*. This recommendation may be taken into account to improve the SEA for future update cycles.

The EA recommends better explaining and, where necessary, reviewing the classification of the impacts on the environmental issues considered by the socio-economic objectives providing for the development of activities or uses likely to have an impact.

This recommendation concerns a component of the SEA whose methodology was developed by the consulting firm and whose document cannot be modified *retrospectively*. This recommendation may be taken into account to improve the SEA for future update cycles.

However, it should be noted that the socio-economic objectives (SEOs) all relate to the development of sustainable activities with specific objectives and indicators targeting the selectivity of fishing practices, the environmental and energy performance of port or maritime transport policies, and the training of supervisors and practitioners of water sports, for example. As such, they do not compete with the environmental objectives.

Furthermore, the objectives set out in the DSF are to be read at a global planning level and do not preclude the application of the "avoid, reduce, compensate" (ERC) sequence at project level.

The EA recommends supplementing the dossier with an analysis of the impact of fishing, aquaculture and aggregate extraction on Natura 2000 sites.

It should be noted that, with regard to the impact of fishing, fisheries risk assessments (FRAs) evaluate the risk that commercial fishing activities carried out in a Natura 2000 site may undermine the conservation objectives of that site. FRAs are mentioned in the environmental objectives and monitoring them will enable progress to be tracked.

Similarly, for other activities, a detailed analysis of Natura 2000 impacts is carried out at the project stage, and considerations on this subject are already included in the SFM project: the matrix used to cross-reference environmental issues and activities in order to identify potential pressures is an example of an analysis that is both scientifically robust and communicable to the general public, thereby informing the spatial planning process; Annex 1, which describes the main activities on the coast, also provides further details.

The Ae recommends assessing, in each designated area, the proportion of Natura 2000 sites likely to be subject to high protection and specifying the level of protection to be achieved in view of the issues at stake.

With regard to the recognition of maritime areas under high protection in Natura 2000 sites, it was decided not to specify either the surface areas or the level of protection to be achieved, either in the summary document or in Annex 8.

The areas identified for the development of strong protection are "study areas" that must be assessed for recognition on a case-by-case basis: various marine protected area (MPA) tools and management measures in the same area may *ultimately* be recognised as strong protection. The boundaries of the maritime areas recognised as strong protection are not known.

Consultation must take place for each study sector at the local level (based on assessments of issues and uses) and via the association of stakeholders concerned by the future perimeter envisaged for the various MPA tools to be recognised as strong protection.

The Ae reiterates its recommendation to establish mutualised compensation systems in each of the coastal areas.

The application of the ERC sequence at sea is particularly complex due to:

- gaps in knowledge about marine ecosystems;
- the difficulty in quantifying impacts and therefore the measures needed to offset them;
- the existence of numerous sources of pressure (at this stage, there is no consolidated method for assessing cumulative effects, which is currently being developed by the State);
- the impossibility of mobilising certain tools applicable to the terrestrial environment (e.g. land acquisition).

While the "avoidance" component can be applied at the level of façade planning, the "mitigation" component

"Compensation" poses particular challenges. Marine ecological issues are very difficult to compensate for, due, for example, to the time required for the formation or restoration of

marine habitats (the destruction of loose sediments, the result of thousands of years of evolution, cannot be compensated for, for example) or the mobility of species and the lack of knowledge about their functional areas. Habitats that can be compensated for today – in particular seagrass beds and coralligenous habitats – are the subject of experimental techniques at various stages of maturity.

The guide published in 2023 by the French General Commission for Sustainable Development (CGDD) on compensation in the marine environment specifies that compensation "*can be anticipated and planned within the plan or programme to overcome the limitations identified during the implementation of compensation measures at the level of projects subject to authorisation. This anticipation may, for example*, *make it possible to plan for the pooling of certain compensation measures in order to ensure their ecological effectiveness and territorialisation*." In its preliminary framework, the Ae emphasises the importance of the DSF including consideration of this issue and, where appropriate, identifying degraded sites of potential ecological interest where ecological restoration efforts are desirable. The opinion specified that the use of marine protected areas could be a solution under certain conditions.

To take this recommendation into account, given the limitations outlined above, the work already undertaken may then be translated into actions under the operational component of the DSF or incorporated into the next update of the SFMs. As such, the current action plan includes an action aimed at "supporting the implementation of the ERC sequence at sea in the context of project authorisations leading to the artificialisation of the marine environment". The implementation of this action could therefore feed into discussions on the feasibility, for example, of creating natural compensation, restoration and renaturation sites (SNCRR) at sea, even if the State services must first stabilise the framework within which this work is to be carried out.

With regard to the use of marine protected areas, although the network itself – which already covers a large area – is not intended to expand significantly beyond the extension or creation projects already identified under the SNAP and DSF, the contribution of project leaders to strengthening restoration actions in existing MPAs is one avenue that has been identified. However, this may conflict with the principle of additionality of compensation measures (a compensation measure cannot be chosen from among the measures/actions already identified and planned within an MPA with the aim of contributing to the protection of the site), as set out in the national guidelines on the implementation of the ERC sequence[4].

The Ae recommends that the non-technical summary should include the land use conflict maps and to take into account the consequences of the recommendations in this opinion.

The SFM is not intended to territorialise the risks of conflicts of use but to prevent them from arising. To this end, it contains a summary map of existing socio-economic issues at the level of the coastline in Annex 4, as well as maps of the existing situation and planning, by area of use, in Annex 8. The same annex provides

[4] "...As a result of the net loss objective, any compensation measure must demonstrate both ecological additionality, i.e. it generates an ecological gain that could not have been achieved in its absence, and administrative additionality, to public and private commitments " (National guidelines on the sequence of avoiding, reducing and offsetting impacts on natural environments, CGDD, 2013, p. 186.

In the preamble, key points are provided so that the established vocations can serve as a guide for stakeholders and government departments in the event of conflicts arising at local planning levels.

The Ae recommends prohibiting any irreversible decisions regarding the establishment of wind farms until the results of research into their impact on birdlife and bats are available and the necessary ERC measures have been defined.

The final decision on the construction of future offshore wind farms planned in the DSFs will be made when the necessary authorisation for the construction and operation of the structures is issued (environmental authorisation on public maritime property or single authorisation in the exclusive economic zone).

The granting of these authorisations is conditional upon the completion of an impact assessment for each project. This assessment will accurately evaluate the impact of the installations on the environment and the ERC measures to be implemented to ensure a residual impact level, particularly on birdlife and bats. This study will take into account the current state of knowledge on birdlife and bats, in particular the results of the MIGRATLANE knowledge acquisition programme, which is due to be completed in 2027, as well as feedback from the first offshore wind farms. Authorisations for the first offshore wind farms planned in the DSF update will be issued by 2029.

The Ae recommends developing a coastal port strategy within the DSF to preserve environmental issues, particularly with regard to port projects, and more specifically the strategic project of the GPM de Nantes Saint-Nazaire, and to complete its environmental assessment accordingly.

The SFM cycle 2 takes into account major port issues in terms of the environment (creation of a cross-cutting objective on reducing greenhouse gas emissions, maintaining and strengthening existing objectives and indicators on cooperation, environmental performance and the energy and ecological transition of ports on the coast). In parallel with these strategic guidelines for the coastline, there are dedicated strategies at appropriate levels, whether global (French Energy and Climate Strategy) or sectoral (National Port Strategy, 2021-2026 Strategy for the Grand Port Maritime de Nantes Saint-Nazaire, 2023-2033 Regional Port Strategy for the Brittany region, etc.).

Both aspects are taken into account and aligned within the framework of the implementation of the DSF action plan. It is therefore proposed to build on existing and ongoing strategies and actions, as the development of an additional strategy at the DSF level does not seem appropriate.

The Ae recommends supplementing the dossier with a presentation of the factors that justified the 3% target for high protection zones (HPZs) set for the NAMO coastline by the SNML, particularly with regard to the sectorisation of the high and very high stakes under consideration. It recommends clarifying the conditions for ZPF certification and their adaptation to specific situations encountered, as well as the possible path to achieving the assigned target.

Since the opinion was issued by the Ae, the framework for the deployment of high protection has been provided by the technical instruction published in the official bulletin on 10 September 2025[5], which specifies in particular the characterisation of the issues and the conditions for certification.

With regard to the path to achieving the objective, it was decided not to specify any intermediate targets in terms of NAMO: the areas identified for the development of high protection are "study areas" that are subject to case-by-case assessment.

The Ae recommends that the development of aquaculture be scaled in line with its impact and feasibility of the ERC sequence.

Aquaculture planning is an integral part of the DSF, particularly with regard to its action plan (DE-OSE-VIII-6-AF1 "supporting the development of aquaculture activity through various management and planning tools"). It will be formalised within the strategic component during the next planning cycle. Prior to the launch of the planning work, discussions were organised by the DGAMPA, in conjunction with the DIRM, involving stakeholders from the NAMO coastline during the summer of 2025. This work involves updating the criteria for defining suitable areas and then mapping these areas.

The Ae recommends developing a section in the draft DSF that reports on the available available "fishing risk" analyses and their ongoing updates, as well as, more broadly, a presentation of the potential impacts of commercial fishing on all environmental issues, and to supplement the environmental assessment accordingly.

The DSF is not intended to freeze the progress of the ARPs at the time of the SFM update. However, this work is covered by the OEs and the action plan.

With regard to the impacts of commercial fishing activities, reference should be made to the matrix in the summary document and Annex 1 describing the main activities on the coast and their interactions with the environment (impacts/pressures and dependence).

The EA recommends developing a section dedicated to reducing greenhouse gas emissions from coastal activities, documented by a quantitative assessment of emissions and ambitious trajectories.

The SFM (cycle 2) incorporates a new cross-cutting objective relating to the decarbonisation of maritime activities (an issue shared by several socio-economic sectors). It is accompanied by three indicators: changes in GHG emissions from maritime transport and coastal ports (to be assessed during the cycle), the number of remotorised vessels in the blue economy, and the number of commercial vessels delivered that are equipped with carbon-free propulsion systems.

These indicators may be reinforced as part of a national effort to develop a method for assessing greenhouse gas emissions (in conjunction with the SNML), and thus be incorporated into the next planning cycle.

[5] Available here: https://www.bulletin-officiel.developpement-durable.gouv.fr/documents/Bulletinofficiel-0034189/TECL2525202J.pdf

III. Consideration of opinions and contributions gathered during the public consultation phase, from authorities and neighbouring countries

1. Electronic public participation (PPVE)

In accordance with Article L.123-19-1 of the Environment Code, the PPVE was the subject of a "*Summary of comments and proposals from the public, indicating those that have been taken into account*." This summary, along with all contributions received on the platform (in the appendix), is available at the following link:

Link to follow

2. Consultation with authorities

2.1. Consultation procedures

In accordance with Article R.219-1-10 of the Environment Code, the coordinating prefects have forwarded the updated SFM draft (with the opinion of the Ae) for review to:

– to the North Atlantic - Western Channel Maritime Council;
– the National Council for the Sea and Coastlines;
– the Regional Conference for the Sea and Coastline of Brittany;
– the Loire-Brittany Basin Committee;
– to the Brittany Regional Biodiversity Committee;
– the departmental and regional councils of coastal departments and regions;
– public establishments for inter-municipal cooperation or joint associations responsible with drawing up coastal territorial coherence plans;
– regional sea fishing committees;
– the Chief of Staff of the French Navy;
– the coordinating prefects of neighbouring coastal areas.

Opinions were to be submitted within three months, failing which they would be deemed favourable. For the North Atlantic – Western Channel coastline, the consultation took place from 5 May to 5 August 2025.

2.2. Lessons learned from the consultation with the authorities and consideration of the opinions issued

Of the 16 opinions issued by the authorities consulted, two concluded unfavourably on the updated SFM project. The various comments made in all of these opinions were classified into eight themes: method and governance; marine renewable energies ; environment, marine protected areas (MPAs) and high protection zones (HPZs), strategic objectives and map of uses; maritime activities; implementation and operational aspects; enforceability and land-sea link; knowledge.

2.2.1. Method and governance

Several opinions regret that the SFM update schedule forced consultation and did not allow for an assessment of the first cycle, and note shortcomings in the national framework elements (instruction note on ZPFs, multi-year energy programme no. 3).

The time constraints are a shared observation, and work is currently underway to simplify and integrate the various components in order to free up more time in each cycle for the implementation and coordinated management of the DSFs.

It should be noted, however, that the quality of consultation within NAMO has been regularly praised during the various stages of debate, consultation and discussion.

At the national level, the technical instruction of 8 September 2025 on the recognition of high protection zones in maritime areas, published on 10 September 2025, follows important announcements on the deployment of the ZPF network at the UNOC conference in June 2025. SFM Cycle 2 now refers to this instruction, which is eagerly awaited by stakeholders and the public.

More specifically, regarding the lack of synchronisation between the adoption of the multi-year energy programme (PPE) and the SFM, it should be noted that the objectives for the development of offshore wind power are defined in the SNML (Objective 13 "Develop marine renewable energies to contribute to carbon neutrality by 2050, with a target of 18 GW commissioned by 2035"). Furthermore, a distinction should be made between the spatial planning exercise – which includes the prioritisation of areas for wind energy development – and the PPE, which specifies the 10-year development targets. The priority areas for offshore wind power over the next 10 years identified in the SFM will be subject to calls for tenders in accordance with the objectives and timetable of the PPE.

The difficulty of understanding the SFM has been noted (document too technical and voluminous, with numerous appendices).

The purpose of the SFM summary is precisely to provide essential planning information. As the appendices are required by law and regulations, it is difficult to envisage reducing them. For this new cycle, a "rationalisation" process has led to the removal of a chapter considered non-essential, as well as the simplification of messages and improved accessibility of key information.

However, as the public debate has highlighted a need for education on planning among local authorities and the public, work is being carried out in this area, both in terms of tools and meetings in the regions. Acculturation to the DSF will therefore continue during the implementation of the DSF action plan. Finally, there is a shared need to increase understanding of the enforceability of the DSF in relation to other plans and programmes, and a supplement has been added to this effect in the preamble to the summary document (§3).

Several opinions call for a strengthening of the inter-facade approach. Some specify that this strengthening would be likely to promote the achievement of environmental objectives through the work carried out on the ARPs and ZPFs.

In response to these recommendations, inter-coastal issues were explored in greater depth in the second cycle of the SFM, both in its preamble, where they are now described in greater detail (§2), and in the cartographic atlas (Appendix 4), which includes a map of energy projects and electrical connections on the Atlantic coast.

Furthermore, it should be noted that government representatives (authorities and departments) regularly work on issues relating to the interfaces, as detailed in the documents made available to the public and authorities during the debate, consultation and consultation phases[6].

[6] - The project management file prepared for the public debate "La mer en débat" (The sea under debate) is available **HERE**.

These exchanges must be strengthened, particularly with regard to energy planning in the Normandy-Brittany Gulf, with the forthcoming establishment of a liaison committee bringing together representatives (authorities and services) from each of the MEMN and NAMO coastlines. The coastal authorities (CMF and CP) and the regional sea and coastal assemblies are and will be kept informed of the planning work at the interfaces.

Several opinions welcome the holding of a public debate, while regretting the polarisation of the debate around certain themes and pointing to the resulting need for shared maritime acculturation.

National events, both on the coast and in the regions, contribute to this necessary sharing of maritime issues in order to enable as many people as possible to better know, understand and take ownership of the sea and the coast. Acculturation to sustainable ocean and coastal management continues beyond the public debate, particularly within the territories as part of the support for the implementation of the action plan. In addition, the DSF NAMO action plan includes actions that respond to this challenge, such as action DE-OSE-VIII-2-AF1
"Raising awareness and providing training in sustainable fishing professions" and RF-OSE-I-2-AF1 "Promoting
the emergence of a maritime community covering the NAMO coastal areas.

One opinion recommends strengthening the adaptability of maritime planning by allowing deliverables to evolve during the cycle in response to crises or exceptional events.

The DSF is already evolving during the cycle, as the strategic and operational components are revised according to different timelines. Furthermore, the Vision for 2050 (preamble, §7) refers to the major challenges currently facing us and to "health, geopolitical and climate crises", as well as to the ability of the men and women living on the coast to build a resilient model that responds to the challenges of sobriety and sovereignty in the face of these events. In the same vein, "anticipating and taking into account major crises and adapting policies and decisions" is one of the 18 common and cross-cutting issues for all the areas and activities identified in the summary document (part 1).

Another opinion considers that the changes made to the vocational map are likely to upset the balance of certain activities. More specifically, it is pointed out that the guidelines for EMR planning are not consistent with the guidelines in the 2019 vocational map.

The update to the vocational map is *minimal*: the boundaries of the areas have not been changed and the priorities have been adjusted for the areas affected by the deployment of offshore wind farms, in accordance with the areas identified in the interministerial decision of 17 October 2024. Furthermore, the State has committed to ensuring that the development of new activities promotes, as far as possible, the coexistence of different uses at sea, including within offshore wind farms during the operational phase, within the limits permitted by maritime safety.

- The Decision of 17 October 2024 following the public debate "La mer en débat" (The Sea in Debate) on updating the strategic aspects of coastal strategy documents and mapping priority maritime and land areas for offshore wind power, as well as the Report by project owners on taking into account the lessons learned from the public debate "La mer en débat" are available **HERE**.
- The consultation page continues, including a "Frequently Asked Questions" section compiled during the consultation phase. The ongoing consultation process is available **HERE**.

In this regard, it should be noted that within each zone, the established vocations do not prioritise economic and social issues over ecological issues (and vice versa) but provide guidelines for organising activities between them in the event that they compete with each other[7].

As with the assessment of the environmental impacts of activities presented in the strategic environmental assessment accompanying the update of the SFM, an assessment of the socio-economic impacts of restrictions on commercial fishing under environmental protection regulations or the introduction of new activities is required.

Balancing economic, social and environmental issues is a key principle of maritime spatial planning. Through its integrated approach, the DSF aims to achieve the BEE and maintain or develop sustainable activities and uses; by translating this into the map of uses, it seeks to avoid conflicts of use.

In addition, Appendix 1 provides a detailed description of maritime and coastal activities and uses, their interactions with the marine environment and other uses of the sea, and, for certain activities, prospects and factors for change. Although these elements are presented succinctly, they constitute a preliminary assessment of the socio-economic impacts resulting from the challenges facing each sector.

One opinion calls for a more detailed analysis of the spatial and temporal interactions between activities and the environment and between uses. Another opinion calls for a more in-depth analysis of the impacts of existing and new activities and an assessment of cumulative impacts, as well as the development of an effective ERC sequence adapted to the maritime and coastal environment.

The study of interactions is a complex subject, which has been included in the DSF since the first cycle as it responds to Article 8 of the MSFD. The analysis has been enriched compared to the previous cycle (part 1 §8 of the summary document) and accompanied by two matrices summarising the pressures and impacts generated by activities on the marine environment.

However, given the scale of this exercise (the façade), it is not possible to carry out this analysis in greater detail: the pressures and impacts are therefore presented without specifying the level of the issue, the intensity of the pressure or the sensitivity of the environment to this pressure. Consequently, the pressures and impacts may vary depending on the type of practice/technique used or the locations where the activity takes place. A case-by-case analysis is therefore necessary to better determine the nature of these interactions (for example, as part of a project impact assessment or a Natura 2000 impact assessment).

With regard to the impact of human activities, offshore works, structures or developments are subject to an environmental assessment, during which an impact study is produced. In accordance with Article R.122-5 of the Environment Code, the significant impacts of the project are assessed, particularly in terms of their cumulative impact with other activities. The procedures for monitoring the project's impact on the environment and human health are specified in the authorisation decree and are binding on the project owner. In addition, the working group on the cumulative effects of marine renewable energy projects (GT ECUME), created in 2018, is responsible for proposing a method for assessing the cumulative environmental impact of offshore renewable energy projects on biodiversity and marine ecosystems. A first draft of the recommendations note

[7] For further information, see the "keys to understanding the use of the vocational map" in Appendix 8 of the SFM.

for the assessment of the cumulative impacts of offshore wind farm projects was published in 2021. The ECUME working group is continuing its work through research projects, the results of which will be posted online as soon as they are available[8].

Finally, the application of the ERC sequence at sea is particularly complex due to:

- gaps in knowledge about marine ecosystems;
- the difficulty in quantifying impacts and therefore the measures needed to offset them;
- the existence of numerous sources of pressure (at this stage, there is no consolidated method for assessing cumulative effects, which is currently being developed by the State);
- the impossibility of mobilising certain tools applicable to the terrestrial environment (e.g. land acquisition).
  land acquisition, for example).

An opinion calls for continued consultation in the implementation of the strategic guidelines contained in the SFM, particularly on strong protection and offshore wind power.

The technical instruction on high protection specifies that, in order to achieve the target of 3% of the waters of the NAMO coastline by 2030, maritime areas that can be recognised as high protection areas must be prioritised within an MPA. Recognition as a high-level protection zone thus highlights the good practices and exemplary management of the protected area in question. There are 11 categories of protection tools in France, each with its own governance system[9]. All stakeholders are involved (local authorities
territorial authorities, socio-professional users, recreational users, representatives of environmental associations, scientific experts, government departments) in the consultation process at local level.

Furthermore, it should be noted that, in the event of increased protection in potential ZPF study areas, measures to regulate usage and/or decrees to protect natural habitats or biotopes may be implemented. These are issued by prefectural decree. As a result, they are automatically submitted for public consultation, which is then also involved in the project to strengthen protection, before it is subsequently proposed for recognition as a high protection area.

As provided for in Article 6 of Decree No. 2022-527 of 12 April 2022, proposals for recognition as high protection for maritime areas are subject to consultation at the coastline level, via the CMF's standing committee. Progress reports on the development of the ZPF network and associated monitoring will be carried out at the coastal level, in plenary session of the CMF.

Finally, the consultation process between the State and RTE with the various stakeholders on offshore wind projects is continuing in accordance with Article L.121-14 of the Environment Code. Consultation on ten-year projects is being conducted under the aegis of guarantors appointed by the CNDP, who are responsible for ensuring the quality of information and public participation until the public inquiry into the environmental authorisation of the farms.

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[8] For more information, see the page dedicated to the ECUME working group on the offshore wind energy portal: https://www.eoliennesenmer.fr/observatoire/ecume

[9] For more information, see the "Protection of the marine environment" section in Appendix 1 of the SFM.

The desire to review the various contributions made during this consultation and to be informed of the follow-up given to these requests was expressed in a notice.

The opinions and contributions from the PPVE, the consultation with the authorities and neighbouring states were analysed to determine the follow-up action to be taken. This analysis then enabled the finalisation of the contents of the SFM with a view to its adoption by the coordinating prefects. The traceability of the contributions and follow-up action taken is ensured through this environmental statement, which is attached to the decree adopting the SFM.

A proposal has been made to involve the GALPAs (local action groups for maritime areas) of the regional network of maritime territories in maritime planning in order to improve ownership.

This suggestion is fully in line with the implementation of the NAMO DSF action plan, whose support strategy includes a mechanism for gathering information on the experiences and actions carried out by the territories, to be pursued by promoting the "network leaders" and other existing dynamics.

One opinion calls for greater consideration of equity and social justice in the DSF.

The social dimension is a major issue, highlighted in the NAMO 2050 Vision (preamble, §7): "human well-being, health and employment" are cited as "key objectives of the ecological transition"; stakeholders in the coastal region also aspire to a maritime economy that "creates value and social justice ."

This aspect is also developed in the action plan, which states that "*promoting the blue economy requires the sustainable use and exploitation of its resources, improving the working conditions of those involved with a view to social justice, and is part of the ecological transition*"[10]. Several actions, linked to the DE-OSE-II objective "Developing a pool of skilled and competent labour for the NAMO blue economy", concern maritime workers and aim to improve information on social rights and access to training.

One opinion highlights the need to ensure consistency between the various planning documents relating to the sea (DSF, SNML and other marine environment strategies) and recommends in particular that the SFM further develop the integrated implementation of the four priorities of the SNML.

The DSFs reflect the SNML in terms of coastal areas and are fully in line with its four priorities (the ocean's contribution to carbon neutrality, preservation of marine biodiversity, development of a sustainable blue economy and territorial equity), which are also featured in the public debate "La mer en débat" (The sea under debate). Further work in the next cycle will build on the national efforts.

The SNML is coordinated with other national strategies, notably those for biodiversity (SNB), protected areas (SNAP), ports (SNP), low carbon (SNBC), and coastlines (SNGTC). As proof of this, the environmental objectives (and their indicators) are grouped by major

[10] DSF NAMO Action Plan, Volume 1, p. 20.

guidelines of the SNB 2030 (Appendix 6a). Similarly, the socio-economic objectives are linked to the objectives of the SNML (Appendix 6b).

An opinion recommends assessing funding needs and sources to ensure the proper implementation of the SNML.

The issue of resources for the SNML, but also its implementation in the regions within the framework of the DSFs, is a shared concern, also called for by the CMF and regional assemblies and, more broadly, by stakeholders in the NAMO region.

With regard to the financial resources dedicated to the implementation of the DSF, from 2022 (adoption of the DSF action plan) until 2024, the fund mobilised to support actions within the framework of maritime planning was the Maritime Intervention Fund (FIM). Replaced in 2025 by a maritime axis of the Green Fund, it once again served maritime planning by supporting projects under the NAMO action plan.

It is recommended that the analysis of the cost of degradation be supplemented by including the costs of achieving good environmental status.

The analysis of degradation costs provides a set of figures and economic orders of magnitude that are potentially useful for conducting a cost-effectiveness analysis of marine environment management measures. Cost-effectiveness analysis can reveal areas for improvement in existing measures and thus contribute to assessments of the next action plan. Such an exercise was carried out as part of the strategic environmental assessment of the operational component of the NAMO DSF in 2021 and is included in Annex 6.

For both methodological and conceptual reasons, this type of analysis does not allow conclusions to be drawn about the overall effectiveness of the DSF's environmental actions. Consequently, it does not allow for an assessment of the costs involved in implementing additional measures that would enable good ecological status to be achieved. However, in the next cycle, the link between the analysis of the costs of degradation and the cost-effectiveness analysis would benefit from being strengthened, just as the definition of future action plans would benefit from relying more on cost-effectiveness analysis with the aim of achieving good environmental status with planning for the costs associated with this achievement.

It is recommended that the European Commission's European Ocean Pact be used to consolidate national commitments and support ambitious European regulation.

The SNML provides the reference framework for integrated sea and coastal management, consolidating national commitments around four priorities.

Furthermore, a communication from the European Commission states that, based on consultation with the relevant stakeholders, the Commission will propose an "Ocean Law" by 2027, which will be based on a revision of the Maritime Spatial Planning Directive. Its aim will be to strengthen and modernise maritime spatial planning as a strategic tool that will contribute to the priorities of the Ocean Pact and their implementation, in particular through increased cross-sectoral coordination at national level and a more organised approach by sea basin. The Ocean Law will set out the objectives

relevant, so that they are grouped together in a single framework, and will facilitate their implementation.

It is proposed to strengthen the cross-border approach, in particular to take into account the cumulative effects – for commercial fishing – of Brexit and new regulations in neighbouring countries' MPAs.

At European level, cooperation projects are organised between Member States. These include the Atlantic Maritime Strategy, which France chaired in 2024. The Greater North Sea Basin Initiative (GNSBI) also covers the entire English Channel. These regional forums facilitate collaboration with neighbouring countries on major maritime planning issues: wind energy development, marine environment protection, adapting fishing to new spatial constraints, etc. Answers are also available in the section on cross-border consultation.

There is a call to give greater consideration to local planning initiatives.

The summary document (part 1, §7) focuses on local initiatives for integrated planning or management of the sea and coastline. In addition, the cartographic atlas (Appendix 4) includes a map relating to planning tools, including SCoTs.

More broadly, local planning is taken into account through the implementation of the DSF action plan, both in terms of the actions to be carried out and through the support strategy currently being consolidated (regional workshops, tools for identifying initiatives).

2.2.2. Marine renewable energies, including offshore wind

On the subject of "marine renewable energies, including offshore wind power", 14 of the 16 opinions issued by the authorities are in favour of integrated offshore wind power planning, emphasising its importance for the energy transition and the importance of ongoing dialogue with the State. Two authorities have issued unfavourable opinions in relation to the South Brittany and North Brittany projects.

sur façade,
contributions received are presented below:

One contribution points out that the offshore wind planning objectives for the coastline are not covered by the current Multi-Year Energy Programme.

The multi-year energy programme, which must be compatible with the SNBC, sets out the guidelines and priorities for action by the public authorities for the management of all forms of energy on the mainland, in order to achieve energy policy objectives. PPE No. 3 will cover the next decade and its initial guidelines were submitted for public consultation on the internet from 22 November to 22 December 2023.

In order to achieve its climate objectives and in a context of necessary acceleration of the energy transition, the draft PPE plans to increase carbon-free energy production while reducing overall energy consumption. Demand for carbon-free electricity will increase due to the electrification of sectors that currently consume fossil fuels, the reindustrialisation of the country and the potentially limited availability of carbon-free energy sources linked to biomass. France has therefore embarked on a path combining the development of new nuclear power plants

nuclear production units, the continued operation of existing nuclear power plants and the development of new renewable energy capacities, including photovoltaic, onshore and offshore wind power.

Several contributions focus on the importance of developing offshore wind power while ensuring coexistence with maritime activities, traffic, aquaculture and fishing (including the fishing industry) through the deployment of the least restrictive technologies.

Planning is the first step in avoidance according to the ERC sequence. The consideration of pre-existing activities is already provided for in the current tender specifications with requirements for fishing, and could be extended to experimentation with co-activity with aquaculture and seaweed farming in accordance with existing fishing practices. A study of the modalities of fishing/park co-activity applied to the BNO project will identify the least restrictive technologies for maintaining fisheries.

One contribution calls for an assessment of the various greenhouse gas emissions associated with the development of offshore wind power and the decarbonisation of maritime activities.

A greenhouse gas emissions assessment is required from tender applicants,
with a maximum threshold that must not be exceeded as a prerequisite.

One contribution calls for greater consideration of inter-facade dynamics in consultation and planning.

With regard to inter-coastal coordination, even though each coast has its own governance (CMF), exchanges between government departments, particularly between the South Atlantic, North Atlantic-Western Channel and Eastern Channel-North Sea coasts, are ongoing in order to take into account the interdependence of marine environments and activities.

One contribution focuses on the importance of ensuring local economic benefits (employment, ports, training, logistics), financing the adaptation of port infrastructure, while supporting the blue economy and ensuring consistency with regional port plans.

The government has confirmed its commitment to maximising the local economic benefits of offshore wind power, particularly in terms of jobs, training and port logistics, by mobilising regional industries and industrial clusters.

The government is also supporting the adaptation of port infrastructure, with a €190 million France 2030 call for projects designed to help ports accommodate activities related to floating wind power.

This approach to developing a blue economy meets the three objectives of the SNML[11], set out in the maritime coastline strategies and in the regional plans for development, sustainable development and territorial equality (SRADDET) for the coastline, particularly in the maritime section of the Breton SRADDET.

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[11] Objective 12: "Accelerate the contribution of ports to the decarbonisation of the economy and transport, promote their environmental performance and ensure their resilience to climate change and their activities in the service of the regions." Objective 13 "Develop marine renewable energies to contribute to carbon neutrality by 2050, with a target of 18 GW of offshore wind power commissioned by 2035" and Objective 14 "Support maritime industries in the transition to carbon neutrality by 2050 and secure the supply of non-energy mineral resources within a framework of sustainable management."

In addition, Europe and France are implementing measures to strengthen the European offshore wind industry. The Net Zero Industry Act (NZIA), which is expected to be fully implemented in France by the end of 2025, is a concrete example of this commitment. This regulation aims to support a more secure, autonomous and resilient European offshore wind industry by incorporating criteria for resilience of equipment supply, sustainability, cybersecurity and social standards in line with European values into public support mechanisms.

The specifications for competitive tendering procedures will aim to facilitate the socio-economic integration of projects. Where deemed relevant, competitive tendering procedures will incorporate the opportunities offered by the NZIA, particularly in terms of supply resilience, cybersecurity, social standards and environmental impact.

Although current specifications already include such parameters (minimum share of services provided by SMEs, commitment to professional integration, implementation of participatory financing), there are plans to continue developing these parameters in the specifications for future calls for tenders.

Several contributions focus on revising the taxation of offshore wind energy through the wind energy tax, so that it benefits the territories concerned in a more equitable and broader manner, while financing the adaptation of port infrastructure, support for the blue economy and local authorities investing in maritime and coastal public policies.

The terms and criteria for distributing the tax were raised during public debates, echoing the debates in 2023 within a working group that brought together parliamentarians and stakeholders from the maritime world. At this stage, given the feedback from stakeholders, the government does not plan to change the criteria for distributing the tax on wind farms located on public maritime property.

For offshore wind farms in the exclusive economic zone (EEZ), further from the coast, it is currently planned that the credits will be paid into the general state budget and allocated to initiatives relating to knowledge and protection of marine biodiversity, sustainable exploitation and processing of fishery products, development of other maritime activities and maritime safety. Discussions on whether to change the way the tax works in the EEZ are ongoing.

Finally, it should be noted that the first wind farm affected by the EEZ tax (Centre Manche 1) is scheduled to come online in 2031. The first payments are therefore not expected before 2032.

One contribution calls for the financing of centres of excellence in marine and technological research in order to optimise the deployment of marine renewable energies through a better understanding of ecosystems.

The National Offshore Wind Observatory was set up on 8 April 2022 by the then Ministry of Ecological Transition (now MESFIN and MTECT) and the State Secretariat for the Sea (DGEC, DGALN, DGAMPA), with the support of the OFB and Ifremer.

With a budget of €50 million over three years (2022-2024), this Observatory is responsible for promoting existing knowledge and immediately launching new programmes to acquire knowledge about the marine environment and the impact of offshore wind power

. The three missions entrusted to the Observatory have helped to inform public debate and political decision-making on the development of offshore wind power:

1. Gathering, promoting and making accessible existing knowledge, including feedback from wind farms abroad;

2. Acquire additional knowledge about the marine environment and the interactions between wind turbines and marine biodiversity (including impact reduction);
3. Contributing to the definition of a national scientific methodology for the assessment and monitoring the environmental impacts of wind farms.

The subject of fishing is addressed through the interactions between fishery resources and offshore wind projects. As part of its programme, in 2022 and 2023 the Offshore Wind Observatory approved the launch and/or funding of more than 25 studies with a total budget of almost €30 million.

In addition, the government has set up a biodiversity fund ranging from €2.5 to €25 million, intended knowledge, research & development and the preservation of marine fauna.

Finally, it should be noted that marine and technological research is well integrated into SFM cycle 2. One of its strategic socio-economic objectives is to "support and promote research and innovation in all areas of the maritime economy in NAMO". Two indicators are used to monitor public funds allocated to research and to quantify the number of full-time equivalents involved. This objective is reflected in the operational component through several actions (knowledge acquisition, support for the development of emerging activities and sectors of the blue economy, etc.).

One contribution concerns the extension of the ERC sequence to all the potential socio-economic impacts of planning.

The sequence for avoiding the most significant socio-economic impacts was carried out at the planning stage. The reduction and potential compensation sequences are implemented in part through certain provisions in the tender specifications and during project authorisation requests via impact studies conducted by government departments.

One contribution calls for support for tidal and wave energy technologies, even though they are currently less mature than offshore wind energy.

With regard to tidal energy, which uses the kinetic energy of ocean currents, France's potential is estimated at between 3 and 5 GW, mainly off the coast of Normandy (Raz-Blanchard) and Brittany (Fromveur, near the island of Ouessant). This is technical potential, before taking into account constraints related to other uses, environmental issues and connection capacities. Tidal energy is now reaching an initial stage of maturity that allows for its integration into the future French energy mix to be considered. The future multi-year energy programme may, if deemed relevant, decide to provide public support for this sector.

As for wave energy converters, their less advanced maturity means that their technical potential and technology costs need to be validated before production targets and price targets can be set. To this end, the government is supporting innovation and demonstration projects through

calls for projects. The results of these experiments will validate the potential of each technology and their yields.

One contribution criticises the consultation procedures put in place by the State and the method of identifying areas suitable for offshore wind power, with fishing being taken into account only after the technical criteria for the installation of offshore wind power have been studied.

For nearly two years, the French government has been engaged in a consultation process to identify areas throughout France that are suitable for offshore wind farm development. Along the NAMO coastline, this process has resulted in a number of initiatives.

A national public debate on the revision of coastal strategies, including offshore wind power, was held from November 2023 to April 2024. Along the coast, public meetings and more than 70 events were organised in all departments. The mayors of all coastal municipalities were invited by letter from the CNDP to express their views.

As part of the public debate, meetings for elected officials were organised along the NAMO coastline, under the auspices of the coordinating prefects for the coastline (Maritime Prefect for the Atlantic and Prefect for the Pays de la Loire region).

Government departments also took part in local events, notably at the invitation of development councils, in order to present the offshore wind planning policy.

Finally, throughout this process, the specialised bodies bringing together stakeholders from the maritime and coastal sectors – CMF and the regional maritime and coastal assembly and conference of the Pays de la Loire and Brittany regions – were kept informed and involved in the work of the State services.

Finally, from a methodological point of view, the State first identified areas suitable for offshore wind power based on five criteria (average wind speed, bathymetry, distance from the coast, maritime navigation safety and compatibility with defence issues). These suitable areas were submitted for public debate. The government then analysed the issues at stake (connection potential, environment, landscape, fishing and other human activities) within the suitable areas, based on studies and data made available on the "La mer en débat" website and on www.eoliennesenmer.fr.

A critical contribution concerning the change in priorities set by the vocational map between fisheries and MRE compared to the first cycle of the DSF and the failure to take into account the proposal for a zone of lesser constraint for fisheries.

Within the four metropolitan coastal areas, priority zones for offshore wind power have all been defined using a single method: based on five technical criteria for installation (wind, bathymetry, distance from the coast, navigation safety and compatibility with defence issues), followed by cross-analysis of environmental, landscape, connection and socio-economic issues, avoiding areas of high fisheries sensitivity. The proposal from fishermen located outside the indicative areas for further consultation in North-West Brittany and North-East Brittany and within the area of high biodiversity importance was not accepted. As part of the Regional Conference on the Sea and the Coast, the State, with the support of the region, has launched a study of scenarios for the coexistence of fishing and offshore wind energy in the North-West Brittany area. Its findings will inform future competitive tendering procedures.

Regarding the North-West Brittany Offshore Wind Farm (BNO) project:

One contribution concerns the need for an in-depth assessment of the direct and indirect effects of the project, including on nearby and distant activities.
indirect effects of the project, including on nearby and distant activities.

This assessment will be carried out by the future winner of AO10 as part of its licence applications.

Several contributions call for continued consultation in Brittany, particularly with the fishing industry and the coastal areas concerned.

Consultation is ongoing, particularly with local stakeholders and the public, for the BNO zone under the aegis of the regional and departmental prefects and the CNDP guarantor.

One contribution calls for further studies to be carried out in order to "scale back" the BNO wind farm project, either by reducing the size and number of wind turbines or by moving them further away from the coast.

The decision regarding the power and location of the future wind farm(s) in BNO is conditional upon the completion and consultation of several studies commissioned by the presidents of the Regional Conference on the Sea and Coastline of Brittany (CRML) (technological feasibility and terms of co-activity with fisheries, socio-economic benefits). These terms and conditions will be specified in the future specifications.

Regarding the North-East Brittany project:

One contribution highlights the concentration of projects in the Normandy-Brittany Gulf area, the impact of potential cumulative effects in this area and the consequences for fishing and the industry in North Brittany. Another emphasises the need for close coordination with the authorities responsible for offshore wind planning in the Roche-Douvres area and the Channel Islands.

In the specific context of the Normandy-Brittany Gulf, close coordination of French and Anglo-Norman wind energy projects will be ensured by a liaison committee chaired by the prefects of the Brittany and Normandy regions. This liaison committee will address, in particular, the potential cumulative effects of all the projects. In addition, the impact of potential cumulative effects will be studied by the developer(s) when carrying out the project impact assessment.

Regarding the South Brittany projects:

One contribution opposes the location of the two South Brittany farms (AO5 and AO9), which are considered too close to the Morbihan coastline and could potentially impact the landscapes that are an important part of the region's identity. It calls for a rigorous environmental assessment that anticipates cumulative effects.

Updated photomontages and a landscape and heritage study were carried out following the 2020 public debate as part of the development of the initial environmental assessment led by the State (two reports available at eoliennesenmer.fr). This analysis led, in particular, to a reduction in the area of the^{first} park (AO5) from 50 to 40 km^2 and to the perimeter of $^{the\ first}$ park being moved 19 km away from the coast of Belle-Île-en-Mer (excluding the sensitive area

landscape impact of the ministerial decision of 18 May 2021[12] and to limit the impact of the two parks on the maritime horizon. In addition, an initial assessment of the cumulative environmental effects has been carried out by RTE as part of the preparation of the connection authorisation file. It will be successively completed by Pennavel, the winner of the first 250 MW wind farm (AO5), and then by the future winner of the second 500 MW wind farm (AO9).

2.2.3. Environment, marine protected areas (MPAs) and high protection zones (HPZs)

Several opinions request clarification on the methodology for recognising ZPFs (maintaining a case-by-case approach, stability of the regulatory framework), guarantees on stakeholder involvement (when applying for certification but also in the governance of ZPFs once certified) and question the impact of ZPF planning on the achievement of the BEE. In this regard, one opinion regrets that the public and authorities were consulted before the technical instruction on high protection was published. Finally, it is recommended that the recognition of SPAs be based on scientific expertise so as not to restrict activities that have little impact on the environment.

Among the objectives of the SFM update are the achievement of good ecological status and the strengthening of marine environment protection, in particular through the recognition of high protection zones. A new cross-cutting objective, OET01 "Develop high protection", has therefore been added to the environmental objectives of the previous cycle in order to meet the SNML's target of covering 3% of the marine waters of the NAMO coastline with high protection by 2027.

As previously indicated, the technical instruction of 8 September 2025 on the recognition of high protection zones in maritime areas[13], published after consultation, provides all the methodological details requested. It clarifies the provisions of Decree No. 2022-527 of 12 April 2022 defining the concept of high protection and the terms of its implementation. SFM Cycle 2 now refers to this instruction, which was eagerly awaited by stakeholders and the public (Part 2, Chapter 2, §2).

With regard to stakeholder involvement, it should be noted that ZPFs are primarily created within existing MPAs. Each type of MPA has its own governance system, involving the State, local authorities, scientists and stakeholders (fishing committees, environmental associations, etc.). Thus, each ZPF is governed within the framework of the governance system of the MPA to which it belongs (monitoring, annual review of controls, etc.). In addition, this consultation will be informed by ecological and socio-economic assessments, as well as local expertise.

In addition, the NAMO DSF action plan (action AT-01 "Develop the network of high protection zones and strengthen their control") provides for monitoring the conservation status of habitats and species targeted by the ZPFs, as well as monitoring activities at each site in order to measure the effectiveness of these ZPFs. It also states that the CMF is the body responsible for monitoring SPAs along the coast.

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[12] Available at: https://www.legifrance.gouv.fr/download/pdf?id=PtsXqrvMK3DE_8tswnxcm0ycNHXqMIUc82RsIXgJcgs. [13] Available at: https://www.bulletin-officiel.developpement-durable.gouv.fr/documents/Bulletinofficiel-0034189/TECL2525202J.pdf.

A notice calls for compliance with SNAP guidelines for establishing a network of marine protected areas
based on an ecosystem approach.

Within the framework of the SNAP, several objectives enable the creation of a coherent, functional and resilient network of MPAs, such as its first objective of developing a network of protected areas that is resilient to global change. The SNAP is implemented through the coastal action plan (PATM SNAP), which is mainly implemented through the actions of the DSF NAMO action plan, but also through actions taken at national level. For the above-mentioned objective, robust scientific analyses are planned at national level on the representativeness, connectivity, replication and adequacy of the network of protected areas at national and ecoregional levels in mainland France (and overseas).

Several opinions concern good ecological status: one opinion emphasises the importance of allowing existing uses to continue as far as possible when they are compatible with conservation objectives, in line with the balance promoted by the DSF.

As previously mentioned, France has 11 different categories of MPAs, each with its own conservation objectives. For some, the level of protection is such that it is not necessarily possible to retain existing users. In such cases, a framework is proposed as part of local consultation. For other MPAs, it is possible to maintain a balance between protection and sustainable development of the marine environment.

One opinion regrets the insufficient ambition of the method, resources and actions associated with SFM to achieve the BEE by 2030.

The update of the SFM has made it possible to carry out work to make the environmental objectives more operational and to enable a greater proportion of them to be achieved during the next EO assessment. In addition, the DSF action plan (adopted in 2022) is currently being implemented; it will contribute, alongside other policies already in place, to the achievement of the DSF's objectives.

A notice reminds us that the achievement of the EEF must be aligned with the regional strategy for biodiversity strategy, through the creation or extension of regional coastal nature reserves.

As previously indicated, the SNML is coordinated with other national strategies, including the National Biodiversity Strategy (SNB) and its implementation in regional biodiversity strategies. The environmental objectives (and their indicators) are grouped according to the main guidelines of the SNB 2030.

Furthermore, the SNML is also linked to the SNAP, which is divided into a national action plan (currently under review) and regional and coastal action plans (PATM SNAP).

One opinion points to the absence of a territorialised action plan for the national strategy for protected areas
(PAT SNAP) for the NAMO coastline.

The PAT SNAP NAMO is due to be published by the end of 2025.

With regard to the nature restoration regulation, one opinion suggests that the DSF should indicate the methodological elements envisaged for defining marine ecosystem restoration areas or plans.

Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration provides for the implementation of measures to restore habitats.

degraded ecosystems, both terrestrial and marine. It aims to cover 20% of the European Union's land and 20% of its seas with restoration measures by 2030, and all degraded ecosystems by 2050. To this end, it sets binding targets for 2030, 2040 and 2050 in terms of closing knowledge gaps, taking restoration measures on degraded habitats, recreating habitats and increasing the quality and quantity of species habitats. For the marine environment, it should strengthen the implementation of existing directives, including the MSFD.

These elements will be included in the national restoration plan, which Member States are required to submit to the European Commission by[1]September 2026 at the latest. Its development will be based on existing measures that can be leveraged under the regulation, including certain measures provided for or included in the FSDs, such as those relating to the development of high levels of protection.

In its preamble (§6), the SFM Cycle 2 now mentions the adoption of the restoration regulation and the obligation for Member States to draw up a national restoration plan by 2026.

In addition, certain environmental objectives target the restoration of habitats or functional habitats for species ("restore salt marshes located in areas threatened by sea level rise" or "maintain or restore functional habitats for seabirds in coastal wetlands").

A notice calls for improved mapping and readability in order to better assess the interconnection between environmental, economic and social issues.

In Appendix 8 of the SFM, the decision was made not to superimpose the multiple environmental issues on the economic and social issues, given the extent of the coastline and in the interests of visibility and clarity of the maps.

However, the planning viewer, Géolittoral[14], allows all issues to be superimposed issues, even in potential ZPF study areas and priority EMR zones.

2.2.4. Strategic objectives and zoning map

Several opinions recommend stability and visibility of the priorities established in the map of uses. One opinion also recommends changing zone 5d to take into account several structuring activities in the Brest harbour (use zone 5d). One opinion questions the decision not to modify the vocation zones and calls for verification of their alignment with areas of importance for fishing.

As previously indicated, the update to the vocational map is minimal: the boundaries of the zones have not been changed and the priorities have been adjusted for the zones affected by the deployment of offshore wind farms, in accordance with the zones identified in the ministerial decision of 17 October 2024. As a reminder, within each area, the established vocations do not prioritise economic and social issues over ecological issues (and vice versa) but provide guidelines for organising activities between them in the event that they compete with each other[15].

[14] Available at: https://geolittoral-data.cerema.fr/portal/apps/experiencebuilder/experience/?id=18c9fadb84264cd48f2959d1f845bab0

[15] For more information, see the "keys to understanding the use of the vocational map" in Appendix 8.

In addition, the description of vocation zone 5d has been expanded to include research and innovation organisations in the Brest harbour area. The port's role in terms of maritime transport and MRE logistical support, already identified in the description of the first cycle, is maintained.

Finally, the areas of importance for fishing (AIF) submitted by stakeholders were incorporated into the cartographic atlas, following the maps produced on the basis of government data (Appendix 4).

A recommendation has been made to specify, for the different areas of use, the procedures for prioritising and managing activities in the event of tension over the use of maritime space, in order to ensure that the BEE is achieved.

The designated areas specify the preferred activities in each area, taking into account both environmental and socio-economic issues. France is committed to reconciling different uses, as far as possible, particularly with regard to maritime safety and cumulative impacts on the marine environment. For example, the working group on multiple use of space within the Wider North Sea Initiative provides an opportunity to benefit from the experience gained from experiments carried out in northern European countries and to examine the feasibility of such use in France.

Once again, it should be noted that within each zone, the established uses do not prioritise economic and social issues over ecological issues (and vice versa), but provide guidelines for organising activities in the event that they compete with each other[16].

A notice recommends ensuring consistency between the environmental objectives of the DSF and the Water Development and Management Master Plan (SDAGE), as well as the development of common scientific indicators and protocols between the WFD and the MSFD.

The Law on the Restoration of Biodiversity, Nature and Landscapes of 9 August 2016 introduces a requirement for mutual compatibility between SDAGEs and DSFs (Article L.219-4 of the Environment Code). This consistency is reiterated in the preamble to the SFM (§3).

The WFD/MSFD assessment criteria have also been harmonised and applied as part of the SFM update. The same applies to the assessment of the status of coastal waters, the first stage of the ongoing revision of the SDAGE. The local WFD/MSFD assessment committee, co-chaired by the DIRM NAMO and the Loire-Bretagne Water Agency, has thus enabled this harmonisation for descriptors D5 (eutrophication) and D8 (contaminants).

Furthermore, the establishment of a method of exchange aimed in particular at strengthening the consideration of the environmental objectives of the DSF in land-based policies is the subject of sub-action 4 of action RF-OSE-I-2-AF1 "Promoting the emergence of a maritime community across the NAMO coastal areas".

With regard to environmental objectives, it is recommended that priority be given to more specific, quantitative and ambitious targets than simple compliance with regulations, accompanied by trajectories, particularly with regard to marine water quality.

As previously indicated in response to a recommendation by the Ae, due to its comprehensive nature, the DSF incorporates the regulations applicable in the context of other

[16] For more information, see the "keys to understanding the use of the vocational map" in Appendix 8.

public policies, hence the inclusion of indicators referring to them. However, most of the indicators go beyond the strict application of the regulations.

In light of this recommendation from the Ae and the proposals made during consultations, one indicator was modified and three new indicators were added to SFM 2, bringing the total number of indicators to 88, including:

- one on compliance with regulations governing the approach to and disturbance of (D01-MT-OE01);
- one provides an operational environmental objective (D07-OE04), as it there was no indicator in the previous cycle;
- 1 is linked to a DSF action concerning the reduction of coastal waste dumps, and will enable the environmental objective (D10-OE01) and the action to be assessed.

These adjustments to the indicators are accompanied by two more quantitative targets, *ultimately* enabling an effective assessment of compliance with the environmental objectives.

In addition, the titles of three environmental objectives have been clarified in order to provide a better understanding of their scope.

In anticipation of the next cycle, consideration has also been given to other control indicators in relation to plans and development projects, in order to assess the effectiveness of control rather than mere compliance with regulations. Control reporting mechanisms will be defined and implemented in the future.

It is recommended that ambitious objectives be set, but without prohibiting activities, by focusing on supporting the transition to new practices.

Through its integrated approach, the DSF is fully committed to achieving the BEE and maintaining or deploying sustainable activities and uses; it ensures that conflicts of use are avoided by translating this into the zoning map. In addition, actions in the DSF action plan (cycle 1) aim to make these uses and activities sustainable by reducing their environmental impact.

An explanation is requested of the classification of good status for the majority of bathing sites along the coast.

Summary sheet of the assessment of good ecological status under descriptor 9
The DCSMM's "Health Issues" (pp. 331 to 361 of Appendix 2a of the DSF) does indeed show good results for the vast majority of bathing sites, based on the criterion of "contamination by *E. coli* and intestinal enterococci" (following monitoring of bathing waters carried out by the Directorate-General for Health of the Ministry of Health). This fact sheet summarises the elements of the scientific and technical report prepared by ANSES and, in section 3.4.2, indicates the choice of the aforementioned national criterion and the calculation methodology (including the three metrics used) for the assessment of bathing sites under the MSFD.

With regard to socio-economic objectives, one opinion suggests the development of an indicator associated with objective DE-OSE-V-3 to assess the ambition of commercial ports in terms of ecological transition in order to achieve the BEE.

Significant work has been carried out to operationalise the strategic objectives and associated indicators, alongside improved integration of environmental considerations. However, it has not been possible to develop indicators for all specific objectives; this work will continue during the next cycle, in close conjunction with monitoring of the SNML.

2.2.5. Maritime activities

The inclusion of a new cross-cutting strategic objective relating to the decarbonisation of maritime activities is welcomed. To achieve this objective, it is suggested that energy efficiency be incorporated as a lever for action, that changes in greenhouse gas emissions be quantified at the coastal level, and that adaptation to climate change be developed for coastlines and maritime activities.

The challenge of sobriety, particularly in terms of energy, is a major element of the Vision for 2050 (preamble, §7). It is also mentioned among the 18 common and cross-cutting issues for all areas and activities identified in the summary document (part 1).

Furthermore, the maritime sector's contribution to achieving French carbon neutrality is one of the priorities of the SNML (objectives 12 and 14). The roadmap for decarbonisation of the maritime sector, revised in November 2024, contributes to this. The strategic contract for the French maritime fishing sector also supports the decarbonisation of the fishing fleet.

As indicated in response to a recommendation from the Ae, national work aimed at developing a method for assessing greenhouse gas emissions (in conjunction with the SNML) may be carried out and incorporated into the next planning cycle.

Finally, adaptation to climate change is a national issue, supported in particular by natural risk prevention policies and the SNML, which will be reinforced in the future. It should be noted that this issue also emerged in the important questions that will guide the revision of the Loire-Bretagne SDAGE, also in connection with the flood risk management plan (PGRI) for this basin.

With regard to commercial fishing, the opinions:

- **recommend that the structuring role of professional fishing activities for the territories and in terms of food sovereignty be highlighted more clearly**;
- **call for greater data sharing and expertise dedicated to the fishing industry, in order to coordinate socio-economic and environmental analyses;**
- **recommend, in particular, relying on innovation to combine economic and environmental performance (particularly in the context of the cetacean plan);**
- **recommend including a strategy dedicated to commercial fishing in the SFDs as a lever for development that reconciles economic, social and environmental issues.**

Food sovereignty is mentioned in the Vision for 2050, and the contribution of fisheries to this ambition is already highlighted in the summary document (part 1, §2). More

Overall, the challenges facing the fisheries sector are well integrated into the SFM, through dedicated strategic objectives and their translation into the vocational map.

With regard to data on the sector, it is worth mentioning the recent launch of the Economic Observatory for Fisheries and Aquaculture, announced in 2023, as well as the strategic contract for the fisheries sector, signed in February 2025. The latter includes several actions relating to data and knowledge:

- [5.1] Establish an observatory for the fishing industry and seafood products
- [5.2] Create a scientific and technical centre for the fishing industry
- [5.5] Clarify access to production data from committees

Furthermore, innovation is very much present in the "cetacean" plan, which includes an experimental component with the deployment of acoustic device tests. The choice of devices to be tested is made in collaboration with professionals, and monitoring protocols are put in place to assess their effectiveness.

Finally, the DSF is dedicated to planning activities at sea and, as such, includes strategic guidelines (objectives) concerning commercial fisheries. The aforementioned strategic sector contract takes the DSF into account and thus articulates measures for the sustainable management of fisheries. In addition, the DSF NAMO action plan, currently being implemented, contains a dedicated action aimed at 'developing a fisheries strategy, to be built with professionals' (DE-OSE-VIII-1-AF1).

With regard to aquaculture, two opinions call for clarification of the scope of aquaculture planning, particularly with regard to how this planning fits in with existing tools and how the dynamics of water quality restoration in the various river basins are taken into account.

Aquaculture planning is included in the DSF action plan under action DE-OSE-VIII-6-AF1 "Supporting the development of aquaculture activity through various management and planning tools" (sub-action 1: Implementing the national strategic plan for the development of sustainable aquaculture, in particular the planning of future aquaculture zones on the coast).

With regard to coordination with other aquaculture planning documents, the Aquaculture Plan for the Future (PAA) specifies that the identification of sites suitable for aquaculture is to be integrated into the DSFs (action 1.2.2 of the PAA).

Aquaculture planning will be formalised in the next DSF cycle, with a target date of 2030. Prior to the launch of the planning work, discussions were organised by the DGAMPA, in conjunction with the DIRM, involving stakeholders from the NAMO coastline during the summer of 2025. This work includes the launch of a call for tenders for the development of a map of areas suitable for aquaculture based on updated criteria.

The Loire-Bretagne Water Agency is involved in this planning exercise and will therefore be able to provide any methodological details that may be necessary to take into account the dynamics of water quality restoration.

A notice calls for greater consistency in the regulations governing professional and recreational fishing activities.

Commercial fishing is regulated under the Common Fisheries Policy (CFP) at European level. However, certain species are managed locally.

In Natura 2000 sites, activities are subject to impact assessments (RIA). Measures taken for commercial fishing may also be applied to recreational fishing.

With regard to recreational fishing, this topic falls within the scope of specific objective DE-OSE-VIII-5, "Promoting the development of sustainable recreational sea fishing", for which an indicator was added when the SFM was updated. It should also be noted that consistency is already being sought in reducing pressures.

Finally, it should be noted that the scope of fisheries control will be extended to recreational fishing: from 10 January 2026, recreational sea fishermen will be required to register via an electronic system and declare their catches (if they concern a list of sensitive species), in accordance with Regulation (EU) 2023/2842.

A notice recommends explicitly recognising the strategic role of the nautical sector in the blue economy and helping to ensure sustainable access to the sea and land for stakeholders.

The 2025-2030 roadmap for water sports and recreational boating was signed in September 2025 by industry stakeholders and the Minister for Maritime Affairs. This strategic document highlights the importance and challenges facing the industry in France.

At the coastal level, the update to the SFM reinforces the consideration given to this activity by mentioning the issue of access to water (part 1, §2). In addition, the DSF action plan includes a measure aimed at "promoting access to the sea, the coastline and the hinterland for activities that depend on this access to water and are key to the blue economy" (TE-OSE-II-1-AF1).

There is a call to better promote the role of ports in the development of MRE.

The government has confirmed its commitment to maximising the local economic benefits of offshore wind power, particularly in terms of jobs, training and port logistics, by mobilising regional industries and industrial clusters.

The government is also supporting the adaptation of port infrastructure, with a €190 million France 2030 call for projects aimed at helping ports accommodate activities related to floating wind power.

2.2.6. Implementation and operational aspects

One opinion recommends that more time and resources be devoted to the implementation of the DSF (through its action plan) by mobilising representatives of the CMF college and stepping up awareness-raising and educational efforts aimed at the public and stakeholders (services, local authorities, project leaders).

As the public debate highlighted a need for education among local authorities and the general public, work is being carried out in this area, both in terms of tools and meetings in the regions. A brochure presenting the DSF to maritime stakeholders was also

presented to the CMF in 2025. For this new cycle, a "rationalisation" process has made key information more accessible. Acculturation to the DSF will continue during the implementation of the DSF action plan.

Some opinions offer various suggestions on different themes: the valorisation of dredged sediments, clean ports and ports active in biodiversity, or mooring areas and light equipment (ZMEL).

These are topics covered in the DSF action plan, which is currently being implemented.

One action aims to "seek and develop alternative resources from recycling for silica sand" (DE-OSE-IX-1-AF2). The launch of a study on alternative resources to marine aggregates, including the recovery of dredged sediments, aims to meet this need.

Action DE-OSE-V-2-AF2 "Supporting ports in moving towards sustainable practices" aims to encourage ports to engage in environmental certification processes. In addition, one of the indicators for the objective relating to the energy and ecological transition of ports refers to this type of certification (number of ports engaged in an environmental certification or labelling process).

Finally, one of the objectives of action DE-OSE-VII-2-AF2 "Developing tools to facilitate sustainable water sports" is to promote the establishment of ZMELs along the coast. It should be noted that the recently published Water Sports and Recreational Boating Roadmap contains an action on ZMELs, providing for national steering on this issue.

It is recommended that the actions already undertaken on the land-sea continuum and multi-activities (fishing or aquaculture in offshore wind farms) be promoted.

With regard to the land-sea link, the promotion of actions is part of the implementation of the DSF. The support measures deployed by government departments (census, educational tools, promotional materials) aim to gather information on experiences in the regions and support existing initiatives.

Furthermore, as the coexistence of different uses is a key issue in maritime spatial planning, France is committed to promoting "multi-use" wind farms, in particular by facilitating the continuation of fishing activities. Other combinations of activities, such as aquaculture within wind farms, are also being studied. France is participating in the working group on multiple use of space within the Wider North Sea Initiative, which allows it to benefit from the experience gained from experiments carried out in northern European countries and to examine the feasibility of such projects in France.

It is hoped that the balance promoted by the Vision for 2050 will guide the implementation of the action plan.

The Vision is the affirmation by stakeholders in the coastal region of a desired balance between sometimes conflicting issues. It is the result of consultation within the coastal region's governing bodies, which led to the adoption of the 2030 Vision of the first SFM, and this Vision was then extended to 2050 when it was updated.

The balance between economic, social and environmental issues, as set out in the Vision, is a key principle of maritime spatial planning. Through its integrated approach, the DSF aims to achieve the BEE and maintain or develop sustainable activities and uses; by translating this into the map of uses, it seeks to avoid conflicts of use.

One opinion highlights the need to ensure consistency between the various sources of funding for decarbonisation projects.

The maritime sector's contribution to achieving carbon neutrality in France is one of the SNML's priorities and is the subject of its objectives 12 and 14. The maritime sector's decarbonisation roadmap, revised in November 2024, contributes to this. The strategic contract for the French maritime fishing sector also supports the decarbonisation of the fishing fleet. A cross-cutting objective relating to the reduction of greenhouse gas emissions has also been added to the updated SFM (OT-OSE-I-1).

A notice calls for long-term monitoring of the DSF, both the SFM and the action plan, as well as alignment between the monitoring of the DSF and the SNML.

The monitoring system constitutes the third part of the DSF. It provides information on the indicators listed in the SFM and monitors the achievement of objectives (and their targets, where applicable). The current monitoring system was adopted on 18 November 2021.

A monitoring tool, managed by the Directorate-General for Food, Nature and Housing of the Ministry of the Environment (DGALN) and made available to the DIRMs, provides information on the progress of the action plan. Another new feature of this update is the creation of common indicators for monitoring the SNML and DSFs. Annex 6b lists five common DSF NAMO/SNML indicators:

- Greenhouse gas emissions avoided thanks to the development of offshore wind power
- Coverage rate of municipalities by local coastline retreat maps
- Number of coastal municipalities included in the decree list
- Tourist accommodation capacity of the coastal area
- Tourist function rate of coastal municipalities in number of beds per 100 inhabitants

An opinion piece questions the financing of the consequences of coastal erosion and marine submersion and the implementation of nature-based solutions.

Nature-based solutions are already taken into account in the DSF: for example, action TE-OSE-I-5-AF1 "Encourage the development of local integrated coastal management strategies (including relocation) to complement local flood risk management strategies" aims to support project leaders in operational actions for appropriate coastal management, particularly incorporating nature-based solutions. In addition, the explanation of coastal risks in the SFM summary document (part 1, §5) now refers to nature-based solutions.

However, the establishment of a sustainable financing mechanism to support local authorities is not within the scope of the SFM.

An opinion calls for continued consultation in updating the action plan, based on an evaluation of the previous cycle.

Coastal governance involves consultation within the CMF (in accordance with the provisions of the Environment Code): the CMF's standing committee closely monitors the work of the DSF. Consultation will therefore continue during the implementation of the action plan and subsequent update cycles.

2.2.7. Enforceability and land-sea link

A notice calls for the principle of continuity between the catchment area and the coastline to be included in the DSF. It also calls for greater consultation between the authorities responsible for aquatic and maritime areas, and for better tools to manage the land-sea interface.

The land-sea interface is a major issue identified in the SFM, where it is introduced in the preamble to the summary: the DSF/SDAGE articulation to be implemented in the SAGE is specified there. The association and regulatory consultation of local authorities, in particular the structures in charge of coastal SCoTs, and the Regions under the SRADDET, is also a vehicle for promoting the articulation of land-sea issues.

With regard to actions to be taken on land-based pressures, the current SDAGE Loire-Bretagne includes provisions and measures to reduce pesticide inputs into natural environments. These elements of the opinion will be brought to the attention of the basin authorities to inform the ongoing revision of the SDAGE.

The consolidation of this mutual consideration of maritime and water planning is part of the implementation of the operational component of the DSF, which should enable the establishment and mobilisation of land-sea partnerships.

One opinion questions the fact that local water commissions and public territorial basin establishments are not among the bodies consulted for their opinion, as provided for in Article R. 219-1-10 of the Environment Code, given their role in water planning.

With regard to the consideration of water management issues, the basin committee is consulted for its opinion as part of the consultation process with the authorities on updating the SFM. However, this request has been escalated to national level in order to examine the possibility of eventually amending Article R. 2019-1-10 of the Environment Code.

Several opinions call for a better understanding of the enforceability of the various planning documents, particularly the link between the DSFs and land-based planning documents (by taking greater account of coastal issues in the SRADDETs and coastal SCoTs).

In view of the need for shared understanding among the public and authorities regarding the enforceability of the DSF, the relevant section of the SFM preamble has been strengthened (§3). In order to avoid overloading the document, the decision was made not to draft an additional appendix, but rather to expand and clarify the relevant paragraph to make it more educational and obvious. Tools to aid understanding and adoption may be developed, particularly for local authorities, as part of the DIRM's communication on the DSF.

2.2.8. Knowledge

Several opinions mention the issue of deepening knowledge: whether to ensure that environmental and socio-economic issues are better taken into account in planning, to better inform indicators linked to strategic objectives, or to facilitate access to and sharing of data with stakeholders and the public.

The acquisition and mobilisation of knowledge is a central theme in the updating of the SFM (widely shared by the public during the various consultation and consultation phases). The initial assessment guiding the updating of the DSF contributes to furthering this theme. Planning management will be strengthened during this new cycle, in particular through operational objectives and indicators that are reported on more regularly. Furthermore, with the development of the information system of the Directorate-General for Maritime Affairs, Fisheries and Aquaculture of the Ministry of the Environment and the Sea, access to fisheries data is set to be facilitated during the 2025-2031 cycle. More generally, GIS data on maritime planning is already partially available on Géolittoral[17], the planning visualiser.

In addition, knowledge has been addressed in the DSF since the first cycle through actions in the action plan[18].

Furthermore, as part of the national nature restoration plan "Agir pour la biodiversité" (Action for Biodiversity), a major effort to acquire knowledge will be required in order to comply with the spatial assessment obligations set out in the regulation. In order to meet its obligation to fill knowledge gaps by 2030, France is favouring an approach that combines updated mapping of the cumulative effects of human activities with the strengthening of the network of monitoring stations mobilised under the MSFD, so as to obtain quantitative data that will make large-scale extrapolations more reliable.

Several opinions recommend taking greater account of certain data (land-sea interface areas, greenhouse gas emissions, areas of importance for fisheries).

As mentioned above, the land-sea interface is an important issue for the DSF, which is addressed in particular in conjunction with the Loire-Bretagne SDAGE. With regard to greenhouse gas emissions, it was previously stated that the assessment of emissions from the various sectors is a project that will be developed gradually as part of the implementation of the DSFs, based on the methodologies that will be available at national level. This work will, in particular, provide information for the indicators of the new cross-cutting objective relating to the decarbonisation of blue economy activities. Finally, areas of importance for fishing are now included in the cartographic atlas (Annex 4).

One opinion suggests placing greater emphasis on marine education, which is a powerful lever for promoting greater public awareness of the marine environment and the challenges of its management.

Marine education is a subject taken into account by the DSF, from the first cycle onwards, through specific objectives and actions, among other things[19].

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[17] Available at: https://geolittoral-data.cerema.fr/portal/apps/experiencebuilder/experience/?id=18c9fadb84264cd48f2959d1f845bab0

[18] Such as: TE-OSE-I-1-AF1 Develop and sustain regional knowledge of coastal risks and coastline observation; RF-OSE-II-1-AF1 Conduct studies to improve knowledge of the impacts of offshore activities; RF-OSE-II-1-AF2 Improve knowledge of fisheries; RF-OSE-II-1-AF3 Improve data collection and access to better exploit it.

[19] Such as D01-OM-OE06-AN2 Structuring the practice of coastal and maritime sports and leisure activities (information, awareness-raising and regulation) on issues relating to the sensitivity of species and environments; DE-OSE-VII-1-AF1 Raising awareness and training professionals and users in sustainable water sports; D09-

Work will continue during the next cycles to strengthen maritime culture, which is a key focus of the stakeholders' vision for the coast.

A recommendation calls for greater consideration to be given to the role of ecosystems in capturing greenhouse gas emissions.

Objective 2 of the SNML provides for the identification of coastal and offshore ecosystems (including seagrass beds and salt marshes) that act as carbon sinks.

An opinion also suggests making greater use of the scientific and technical expertise available in the coastal zone.

As part of the MSFD work to assess the ecological status of marine waters (Annex 2a of the FSD) and monitoring systems (Section 2 of the FSD), several scientific organisations are fully involved: the French Research Institute for Exploitation of the Sea, the National Museum of Natural History, the Centre for Documentation, Research and Experimentation on Accidental Water Pollution, the Geological and Mining Research Bureau, Pierre and Marie Curie University, La Rochelle University, Liège University, the French Navy Hydrographic and Oceanographic Service, and the French Agency for Food, Environmental and Occupational Health & Safety. Summaries of their work and detailed reports are also available online.

Finally, the Offshore Wind Energy Scientific Council is a body that fully mobilises this expertise, with some scientists also being members of the National Offshore Wind Energy Observatory. The CMF NAMO is rich in qualified individuals, with a strengthening sought as part of the renewal of this body.

3. Cross-border consultations

3.1. Procedures for consulting neighbouring countries

The maritime planning framework applicable to strategic coastal documents stems from two European directives: Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning, and Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for Community action in the field of marine environmental policy. These two directives stipulate that Member States must cooperate to ensure the consistency of their internal strategies and must therefore implement the necessary measures to this end.

Furthermore, the Espoo Convention aims to ensure that its parties assess the environmental impact of certain activities from the planning stage onwards, and that they notify and consult each other on the activities listed in the convention that are likely to

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OE01-AF1 Raise awareness among recreational boaters about the issue of waste management by recreational vessels at sea; TE-OSE-I-2-AF2 Develop acculturation to safety at sea; TE-OSE-I-1-AF1 Develop and sustain regional knowledge of coastal risks and coastal observation; D10-OE01-AN4 Raise awareness, inform and educate on ocean pollution by waste; AT-02: Develop the network of marine educational areas

have a significant adverse transboundary impact. As such, at the end of May 2025, the project owner contacted the counterpart services of neighbouring States and Espoo Convention focal points by email to inform them of the SFM update process, share the associated documents (non-technical summary and interministerial decision translated into English) and invite these States to give their opinion and/or, where appropriate, conduct a public consultation.

A dedicated page was created on the electronic public participation platform: https://jeparticipe.expertises-territoires.fr/processes/PPVESFM2025/f/165/.

In addition, **a presentation webinar was organised on 18 June 2025** for neighbouring countries. It brought together around 30 participants (United Kingdom, Ireland, Italy, Spain, Belgium, Denmark, Sweden, European Commission).

3.2. Lessons learned at national level

As part of this consultation, ten countries submitted comments to the French authorities (Italy, Belgium, Jersey, Guernsey, the United Kingdom, Norway, the Netherlands, Sweden, Denmark and Spain).

The feedback received mainly concerns the methodology used in the environmental assessment of the areas identified for the installation of future offshore wind farms. Clarification was also requested on the approach adopted for the designation of high protection areas.

Some feedback also concerned elements of sectoral policies that the DSF incorporates as a cross-cutting maritime planning document. Given that the DSF does not create new obligations for these public policies, feedback on these subjects was not addressed in the update of the coastal strategies.

The analysis of the contributions concludes:

- that there is no need to make any substantial changes to maritime frontage strategies in light of the comments made;
- that some contributions do not directly concern the content of the maritime strategy itself, but call for consideration by the French government in the overall management of various maritime public policies;
- that certain comments leading to minor adjustments may be taken into account
- that clarification should be provided on the procedures for developing updated coastal strategies.

The last two points are addressed in the following paragraphs.

On the proposal for data sharing

The Jersey government authorities have expressed their interest in further cooperation in the area of data sharing. Given the imminent implementation of the coastal strategies, this collaboration will not be possible during this cycle. However, this issue may be revisited when the action plans for the coastal strategy documents are updated.

On the environmental assessment methodology for sites suitable for offshore wind development

The strategic environmental assessment evaluates the impacts of offshore wind planning. The SEA is based in particular on sensitivity maps for compartments for which sufficient data is available. These maps take into account the sensitivity of marine mammals and fish to disturbance during the operational phase, as well as the sensitivity of certain fish and elasmobranchs to electromagnetic fields.

The SEA also presents the known effects of offshore wind power on the marine environment, in particular flying fauna and the physico-chemical environment, based on existing literature.

It should be noted that each project will be subject to a detailed impact assessment, based on in situ measurements carried out in each project area, taking into account the specific characteristics of each wind farm.

At the current stage of planning, particular attention has been paid to analysing and taking into account all environmental issues, notably by considering existing Natura 2000 areas, the species concerned by these areas and their specific sensitivity to offshore wind power. Detailed spatial analyses of the issues related to species in relation to offshore wind power have been produced and are developed in the SEA. The priority areas identified have taken into account the issues related to birdlife, and France has also launched two large-scale studies to improve knowledge of terrestrial migratory species.

In subsequent phases, marine research campaigns will be carried out to analyse the various biodiversity compartments concerned in detail. Based on this enriched data, the project leaders selected during future calls for tenders will draw up in-depth impact studies to assess the potential impacts and define appropriate avoidance, reduction and compensation measures. Additional consultations with the States potentially affected by the development of these projects will also be conducted during the administrative review phase, based on the newly produced documentation. Furthermore, before being confirmed for future calls for tenders, the priority areas for 2050 will be subject to several other stages of consultation and study. The States potentially affected by the development of these areas will therefore be consulted again before confirming their consideration for future calls for tenders.

Furthermore, the challenges of coexistence between fishing activities and offshore wind projects are taken into account. France fully shares the objective of preserving fishing activities, which constitutes a priority constant of our maritime policy.

With regard to the wind farms currently under development in France, the approach is systematically aimed at enabling fishing activities to continue, in compliance with safety requirements and technical constraints, under the responsibility of the maritime prefects. This approach is part of the desire to reconcile the energy transition with the preservation of existing maritime activities.

With regard to floating wind power, which is still an emerging technology, the precise terms of coexistence remain to be defined in consultation with all stakeholders. Nevertheless, the objective remains unchanged: to seek the conditions for the most peaceful coexistence possible between these different uses of maritime space.

France advocates a collaborative and transparent approach with neighbouring countries. With this in mind, all environmental and technical studies relating to offshore wind power carried out by the French government are already available to the public on the dedicated website eoliennesenmer.fr. This transparent approach aims to facilitate knowledge sharing and the mutual enrichment of our approaches.

On the state of the marine environment integrated into coastal strategies

Details on the assessment of the ecological status of marine waters

The Spanish authorities have commented on the need to better represent and specify, in percentage terms, the results of the assessment of the ecological status of waters, particularly in areas of special interest, and also stress that it would have been appropriate to add details on the impact of activities on the marine environment.

For methodological reasons, it is not possible to precisely define the percentage of GES achievement at the level of a designated area. Assessments are carried out at scales that are consistent from an environmental perspective (in accordance with the framework provided by the Marine Strategy Framework Directive), which do not always correspond to designated areas. Some of the assessments are sometimes inconclusive for all or part of the coastal areas, although significant progress has been made compared to the previous assessment cycle under the MSFD. These results are appended to the coastal strategies. However, the environmental assessment work has made it possible, in broad terms, to quantify the gap between the areas of interest and good environmental status for the issues considered. However, this work has significant methodological limitations and must be approached with caution.

With regard to details concerning the impact of activities on the marine environment, fact sheets describing the main marine activities are appended to the coastal strategies and include a section on interactions with the marine environment. In addition, a matrix showing the main pressures of activities on the various compartments of the marine environment has been produced and included in the strategy summaries in order to provide additional summary information that was not included in previous coastal strategies.

Details of international agreements applicable in the Mediterranean

The Italian authorities have emphasised the need to clarify the contractual frameworks binding Italy and France with regard to the protection of the marine environment in the Mediterranean.

To take account of the recommendations made, a reference to the Barcelona Convention protocols has been added to a summary document on coastal strategies.

With regard to the Pelagos Sanctuary Agreement, a reference has been added to the section on the vision for the coastline in 2050. The specially protected area of Mediterranean importance is also clearly mentioned in the annex on designated areas for each of the designated areas that form part of the perimeter of this protected area. With regard to the actions defined within the framework of this agreement, their articulation with the coastal strategy document is provided for in the operational section of the latter, which includes an action plan. Thus, the action plan adopted in 2022 does indeed include the promotion of the particularly vulnerable maritime area project to the International Maritime Organisation within the framework of the Pelagos Agreement.

Furthermore, it should be noted that the various national and Community frameworks relating to or applicable to the marine environment are integrated into national strategies (national strategies for the sea and coastline, national biodiversity strategy).

On the definition of high protection zones and labelling criteria

Several States (Jersey, Italy, Spain) have requested clarification on the criteria for defining and designating high protection zones and on the procedures for involving neighbouring countries. The comments made do not imply any change in coastal strategies but call for the following clarifications.

Definition:

High protection is defined by Decree No. 2022-527 of 12 April 2022. It is not a new legal status but a form of "labelling" intended to highlight the exemplary management of an area within a marine protected area in order to protect important ecological issues by seeking to eliminate or at least significantly reduce the pressures generated by human activities. This recognition is therefore not based on the a priori exclusion of certain human activities, but rather on a case-by-case approach, analysing precisely their impact on the ecological issues actually present in the area in question.

High protection zones must cover important ecological issues, primarily within existing marine protected areas. The location of these issues is based on the best available scientific knowledge. Significant issues may refer to any marine habitat or species whose good condition is considered a priority at local, national or international level, for example because of their sensitivity, rarity or degradation. The ecological coherence of the network of high protection zones is also taken into account. The areas to be prioritised for the development of high protection are therefore defined locally, taking into account the specific issues of each coastline.

The procedure for recognising high protection zones is part of a decision-making process led by the maritime prefecture and involving all coastal stakeholders in consultation forums.

Finally, it is worth mentioning the recent publication of the technical instruction of 8 September 2025 on the recognition of high protection zones in maritime areas, which clarifies the provisions of Decree No. 2022-527 of 12 April 2022 defining the concept of high protection and the procedures for its implementation[20].

Objectives for the development of high protection and integration of a trajectory into seafront strategies

The national strategy for the sea and coastline, which is implemented at local level through strategic coastal documents, sets out targets for high-level protection coverage to be achieved for each of the four maritime areas (1% in the eastern Channel – North Sea, 3% in the North Atlantic – Western Channel, 3% in the South Atlantic and 5% in the Mediterranean) by 2027 and for metropolitan waters (5%) by 2030. These targets reflect the desire to distribute contributions among different territories, taking into account the specific characteristics of their biodiversity and the level of human activity they host. This is why, in particular, the target of 1% has been set for the Eastern Channel – North Sea coastline, given the high level of anthropisation of this coastline.

Thus, in order to achieve the above-mentioned targets, areas of study for the development of high-level protection were submitted for public debate as part of the update of coastal strategies, which took place from November 2023 to April 2024. The interministerial decision of 17 October 2024, which draws on the lessons learned from the public debate, includes maps identifying priority areas for the development of high-level protection, on the basis of which consultations should be continued with a view to defining the areas to be proposed for high-level protection certification and, where appropriate, the regulations to be put in place for this purpose.

It should also be noted that at the third United Nations Conference on the Ocean held in June 2025, the President of the Republic and the Government announced the launch of a strategy dedicated to protecting the seabed in mainland France. This strategy includes accelerating the development of strong protection, particularly in deep canyon and coral areas in the Mediterranean and Atlantic. Areas have been identified for certification by 2026. These areas complement the work undertaken at the level of each coastline to establish development trajectories for strong protection, within the framework of strategic coastal documents. An addendum has been posted on the public participation platform to clarify these announcements[21].

[20] Available at: https://www.bulletin-officiel.developpement-durable.gouv.fr/documents/Bulletinofficiel-0034189/TECL2525202J.pdf
[21] For further information: https://www.ecologie.gouv.fr/sites/default/files/documents/250608_unoc-biodiversite_web_DP_AMP.pdf

Coastal strategies now include a development plan for strong coastal protection in order to achieve the targets set by national strategies. These coastal strategies have been the subject of so-called
"downstream" consultations, based on their consolidated version. It is within this framework that neighbouring countries have been consulted, with a view to informing them of these strategies and allowing them to express their views on any cross-border issues they may identify.

Procedures for recognising and managing high protection zones (and more generally marine protected areas), and involvement of neighbouring countries

The procedure for recognising high protection zones is part of a decision-making process led by the maritime prefecture and involving all stakeholders along the coastline within the framework of consultation bodies.

High protection zones are intended to be designated as a priority within marine protected areas. The high protection recognition procedure therefore involves marine protected area managers (who may be the French Biodiversity Agency, a public institution, a local authority, an association, etc.) who propose areas for recognition and are therefore intended to be the managers after recognition. The management procedures are set out in a management document and discussed in dedicated forums. Depending on the location of the area, these forums may involve representatives of institutions or stakeholders from neighbouring states.

3.3. Lessons learned at the coastal level

With regard more specifically to the NAMO façade, the opinions of the United Kingdom, Guernsey and Jersey contain several requests.

All three contributions call for data sharing and regular dialogue with stakeholders. They also request that neighbouring states' maritime planning documents be taken into account in the SFM.

As previously indicated, the terms and conditions for data sharing could be considered as part of the next update. The dialogue initiated by national and regional authorities could be maintained throughout the implementation of the current cycle.

In addition, the Marine Environment Information System (SIMM) has freely accessible databases and data banks linked to the MSFD and the MPED[22].

The SFM now clearly states that planning work is being carried out by neighbouring states.

Jersey and the United Kingdom want a thorough assessment of the cumulative impacts of offshore wind power on ecosystems, fishing activities and landscapes. The United Kingdom

[22] Available at: https://www.milieumarinfrance.fr/

proposes, in particular, to enhance the current "Avoid, Reduce, Compensate" hierarchy by adding a step dedicated to mitigation.

Analysing the impact of activities on the marine environment and the cumulative impact of these activities is a highly complex task. Although our knowledge of the marine environment has greatly advanced, marine environments are ecosystems about which we still need to consolidate our knowledge, not only in terms of the distribution of species, habitats and their condition, but also in terms of their behaviour at sea in relation to human infrastructure and activities.

With regard to offshore wind power, work led by the State via the ECUME interministerial working group was launched in 2018 with the aim of developing a method for quantitatively assessing the cumulative effects of offshore wind farm projects on marine ecosystems, in order to strengthen planning, project impact studies and the implementation of the "Avoid, Reduce, Compensate" (known as "ERC") sequence imposed by the Environment Code on projects subject to environmental authorisation.

This work focuses on the cumulative impact of a project on several species and habitats, as well as on the marine ecosystem as a whole, while also considering the impacts generated by other projects and activities in the vicinity. The ECUME WG also aims to improve the consideration of other activities that generate pressure and their future developments, which add to those of offshore wind farms. The work of the ECUME WG is presented in the fact sheet "The cumulative effects of offshore wind power" in the project management file for the public debate "The sea under debate". The ECUME WG has already published an initial guide of recommendations in 2021. Future publications by the ECUME WG will be made available to the public as they become available and may be presented during the ongoing consultation process. All of these studies will be taken into account when assessing applications for authorisation for wind farms.

The United Kingdom questions the State on the effects of electromagnetic fields generated by submarine cables, particularly on elasmobranchs.

Marine species use the Earth's magnetic field to navigate, particularly during migration (e.g. eels, salmon, sturgeons). In addition, certain species of elasmobranchs detect weak electric fields to hunt. However, most of these species live in the water column, far from the seabed where the cables are laid, which limits their exposure and therefore the likelihood of them becoming disoriented or disturbed. Due to their shielding, the cables do not emit an electric field and, according to studies conducted to date, do not constitute a physical barrier to the movements of the migratory species studied. In particular, in situ studies have not revealed any significant impacts on elasmobranchs.

RTE participates in and leads several research projects aimed at better characterising the potential effects and impacts of electromagnetic fields on benthic and fish communities, and, within the latter, on elasmobranchs.

The United Kingdom is also encouraging the creation of visual tools to better visualise and analyse the cumulative impacts of these projects.

Photomontages and a landscape and heritage study will be carried out as part of the initial environmental assessment to be carried out subsequently by the State.

Regarding the North-West Brittany project:

Finally, the United Kingdom requests that consideration be given to the ferry routes connecting Roscoff that may be impacted by the development of wind farms.

The State is working in partnership with Brittany Ferries to assess and limit the impact of the future BNO wind farm on the Roscoff-Cork and Roscoff-Plymouth routes. This work to avoid, reduce and offset the impact will be continued, if necessary, by the developer selected at the end of the competitive tendering process.

With regard to the connection of the wind farm, RTE will seek to avoid ferry routes when researching the route. If total avoidance proves impossible, the impact on ferry activity will be localised and temporary. During the construction phase, RTE will collaborate with the companies operating in the area concerned in order to avoid or reduce the effects of the work. The cables will be buried in the seabed and activity will resume on the original route once the works are complete.

IV. Reasons for the choices made in the plan or document, taking into account the various solutions considered

The environmental report drawn up as part of the environmental assessment states, in accordance with Article R.122-20 of the Environmental Code:

- Reasonable alternatives that would achieve the objectives of the plan, scheme, programme or planning document: this section presents the alternatives, which were 1) not to update the SFMs, 2) not to coordinate maritime planning with offshore wind planning, and 3) not to strengthen the coordination of the SFMs with the development of strong protection. It also presents alternative scenarios to offshore wind development.
- the explanatory statement setting out the reasons why the draft plan, scheme, programme or planning document was selected: this section explains the criteria used to make changes to the SFM update in terms of its structure, vision, strategic objectives, map of uses, planning of high protection zones and offshore wind planning.

In order to take into account the phases of referral to the Ae and subsequent consultations, it was decided to:

- modify the summary document to make it more educational and comprehensive on certain topics (enforceability, cross-border areas, details on offshore wind planning and high protection zones);
- adjust the appendices where necessary in light of requests made by the Ae, the authorities and the public (adjustment of certain OEs, Annex 8, etc.).

These choices were made in accordance with the balance that enabled the SFM to be defined in a concerted manner. Details of the amendments can be found in the preceding paragraphs.

Some contributions concerned public policies not supported by the DSF and were therefore not included or could not be taken into consideration in the short term.
therefore not been included or could not be taken into consideration in the short term in the

update of the SFM. However, they may be used to inform future updates (targets based on OSE indicators, in-depth analysis and knowledge sharing).

Finally, a significant proportion of the contributions concerned the implementation of the DSF, the ability to assess its effects and take stock of it, in line with the national guidelines of the SNML. The work to implement the DSF, which is set to intensify after the adoption of the SFM cycle 2, will make it possible to meet these expectations.

V. Measures to assess the environmental impact of implementing the plan or document

The environmental report prepared as part of the environmental assessment sets out, in accordance with Article R. 122-20 of the Environmental Code, the procedures for monitoring the plan/programme's impact on the environment. With regard to SFMs, it specifies the methodology used to update environmental and socio-economic objectives, with the primary objective of monitoring them in order to report on the state of the environment.

As this report points out, the strategic document includes a section
dedicated specifically to the procedures for evaluating its implementation. This section, entitled
The "monitoring system" is incorporated into the "operational" section of the coastal strategy document, adopted after the coastal strategy. This monitoring mechanism specifies the surveillance and monitoring mechanisms put in place to monitor changes in the state of the marine environment as part of the assessment of good environmental status, as well as to monitor and assess the achievement of socio-economic and environmental objectives and thus specify the environmental impact of the plan/programme. In addition, the operational component of the DSF includes an action plan comprising concrete measures to meet the ambitions of the DSF as reflected in the strategic objectives, in particular the achievement of good environmental status in the marine environment. The implementation of these actions, combined with rigorous monitoring, should make it possible to reduce the environmental impact of the plan/programme, or even to readjust it if necessary.

The environmental report focuses on the impact of offshore wind farm planning, using sensitivity maps and analyses of landscape impacts, presenting the known effects of offshore wind farms on the environment, implementing the first methods for assessing cumulative effects developed by the ECUME working group, and examining the potential impacts on Natura 2000 sites. Various measures to limit and monitor impacts are presented in the report: requirements in offshore wind energy tender specifications, knowledge acquisition programmes by the National Offshore Wind Energy Observatory, and measures that can be implemented at the level of each project.