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**Declaration pursuant to Article L122-9 of the
Environment Code in connection with the adoption of
the updated South Atlantic coastline strategy**

November 2025

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I. Context

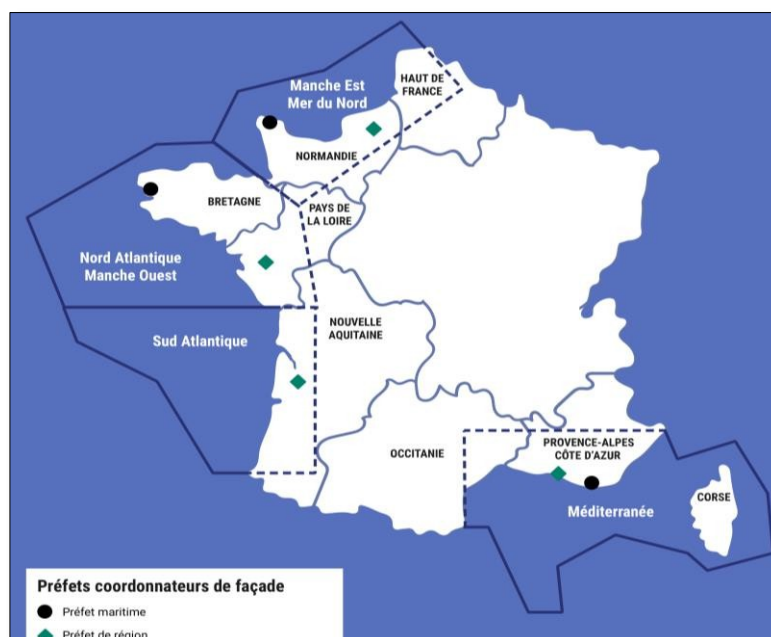
1. General framework for updating coastal strategies

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), complementing the Marine Strategy Framework Directive (MSFD - 2008), 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.

For each metropolitan coastline – the Eastern Channel and North Sea, the North Atlantic and Western Channel, the South Atlantic and the Mediterranean – planning is defined by a strategic coastal zone management plan (DSF). Responsibility for drawing up 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, which provides a forum for dialogue 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.



The strategic coastal documents consist of two parts adopted at different times and updated every six years: the strategic part, known as the "coastal strategy" (SFM), and the operational part. Following an initial cycle of DSF development between 2019 and 2022, the strategic component has been undergoing an update since 2022: this was the purpose of the electronic public participation process (PPVE), 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 status 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.

The characteristics and criteria for good environmental status, as well as the methodologies used to assess the environmental status of marine waters, are defined at national level by ministerial decree. The decree currently in force dates from 9 September 2019 and its provisions need to be updated. The draft decree on the definition of good environmental status of marine waters and methodological assessment standards was subject to consultation from 15 July to 16 October 2025.

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 farm 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 (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 in accordance with the SNML.

The coastal strategies are supplemented by an operational component, comprising a monitoring system and an action plan, which is developed in a second phase.

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 prepared and attached to the draft coastal strategy.

2. Timeline and stages for updating coastal strategies The DSF is

developed through an iterative and progressive process.

- **Since 2022:** The update of the coastal strategy adopted in 2019 began in 2022 in line with the energy programming schedule.
- **From November 2023 to April 2024:** For the first time, the update of the DSFs was the subject **of a public debate entitled "La mer en débat" (The sea under debate)**, led by the National Commission for public debate (CNDP), shared by coastline with offshore wind planning, in accordance with 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 phase of consultation with stakeholders in the maritime sector, the government drew conclusions from the public debate on 17 October through a ministerial decision accompanied by a report from the project owners in response to the CNDP report.
- **December 2024:**
 - On 11 December, the CNDP issued opinions on the update of 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 requests for answers and comments and proposals from the public are sufficiently comprehensive to initiate ongoing consultation".
 - The Environmental Authority (EA) was consulted at the end of December on the basis of the environmental assessment report and the draft coastal strategy, which had been finalised following public debate and consultations. It issued its opinion **on 13 March 2025**.
- **From December 2024 to April 2025:**
 - In order to ensure that the public was properly informed and involved between the public debate "La mer en débat" (The sea under debate) and the current electronic public participation process, an intermediate phase of ongoing consultation was set up. Working meetings and webinars were organised at national level and along the coast in the presence of the guarantors.
 - On 28 April, the CNDP guarantors for this consultation submitted their report.
- **May to August 2025:**
 - The public consultation took place electronically **from 5 May to 5 August 2025**, with the aim of gathering public opinion on the draft seafront strategies.

- At the same time, **between May and August 2025**, various bodies were consulted under the Environment Code (R.219-1-10), as well as neighbouring countries, including au titre de la convention d'ESPOO et des directives mentioned above.
- **From August to October 2025:** The environmental report, 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 for adoption. They will also inform the development of the operational part.

All feedback gathered during these various consultations has been processed.

- The date of adoption of the South Atlantic coastline strategy is **6 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.

In accordance with Article L. 122-9 of the Environment Code, this statement accompanies the decree approving the South Atlantic coastline strategy. It summarises how the environmental assessment and consultations carried out as part of the update were taken into account.

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 Environmental Code, strategic coastal documents 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 shall set out the measures envisaged to avoid significant adverse effects that the implementation of the plan or programme may have on the environment, the measures envisaged to reduce those that cannot be avoided, and the measures envisaged 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 environment of another European Union Member State, it shall be forwarded, together with the environmental report

environmental report, to the authorities of the Member States concerned, which may give their opinion (Article L. 122- 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 the other European Union Member States consulted. It shall make the following information available to them:*

1° The plan or programme; 2°

A summary statement;

- the manner in which the report drawn up pursuant to Article L. 122-6 and the consultations carried out were 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 the implementation of the plan or programme.

This is the purpose of this document, drawn up for the coastal strategies of each coastal areas.

II. Taking environmental assessment into account

1. Terms and conditions of the environmental assessment

For the production of the environmental report, a project management assistance contract was signed with a service provider. Project management was handled by the Water and Biodiversity Directorate, in conjunction with the Directorate-General for Maritime Affairs, Fisheries and Aquaculture, the Directorate-General for Energy and Climate, and the interregional maritime directorates.

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

The work to produce the environmental report took place over nine months 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, which was forwarded on 14 June 2024.

Service providers were thus able to follow the work to update coastal strategies by participating in various internal meetings with government departments or with stakeholders, at national level or along the coast, in order to contribute to their work.

The environmental authority (Ae) was consulted by the coastal coordinating prefects on 16 December 2024 on the draft South Atlantic coastal strategy, on which it issued deliberative opinion no. 2024-135 on 13 March 2025.

2. Summary of the Environmental Authority's opinion

The recommendations issued by the Environmental Authority (EA) relate to both the draft strategy and the strategic environmental assessment report. Some are shared with other coastlines and others are specific to the South Atlantic coastline.

The main environmental issues related to the development of the DSF identified by the Ae are:

- marine and coastal biodiversity;
- greenhouse gas emissions from the blue economy;
- the development of renewable energy production in a manner compatible with the marine environment;
- chronic and accidental pollution from maritime transport and activities in river basins that flow into the coastline;
- the vulnerability of the coastline and ecosystems to risks;
- the landscape;
- geomorphology and the integrity of the seabed;
- the health of coastal inhabitants.

The dossier is considered to be comprehensive and rich in content, but sometimes difficult to access due to the lack of an adequate summary. The Strategic Environmental Assessment (SEA) is considered to be of high quality. The following points are noted in particular:

- uncertainties in the assessment of good ecological status and in the knowledge of pressures;
- the absence of assessment and targets for socio-economic objectives, some of which are limited to regulatory compliance.

In summary, the Environmental Authority's opinion recommends:

Continuing efforts to:

- developing aquaculture planning, and scaling it in line with its impact and the feasibility of the "avoid, reduce, compensate" sequence;
- knowledge of commercial species stocks;
- combating marine mammal mortality in order to achieve good environmental status in this area;
- combating the risks of spreading non-native species through aquaculture activities;
- noise level requirements for projects in order to achieve a negligible impulse noise level
negligible impulsive noise impact;
- implementation of shared compensation systems in each of the coastal areas;

- continuing efforts to implement quantitative targets for strategic objectives strategic objectives;
- sustainable management of marine aggregates.

To be completed:

- the file with assessments of socio-economic objectives and their indicators for the previous cycle, developments, and targets for the current cycle;
- the chapter on priority areas for consultation with a view to developing strong protection, indicating the perimeter of the areas and displaying overlay maps showing energy, aggregate extraction and aquaculture development activities;
- the "Contaminants" determinant with analyses of per- and polyfluoroalkyl substances;
- with strong measures regarding maritime transport, recreational boating and offshore activities in order to have a positive impact on marine environmental contamination;
- with quantitative assessment of direct and indirect greenhouse gas emissions and air pollution;
- the potential impact of socio-economic objectives on the various descriptors in order to be able to recommend appropriate "avoid, reduce, compensate" measures;
- consideration of the effects of aquaculture on ecosystem contamination as an indirect impact on Natura 2000 sites;
- the document by developing a coastal port strategy and its environmental assessment;
- the strategy by developing a section dedicated to reducing greenhouse gas emissions from coastal activities.

To amend:

- indicators targeting regulatory compliance, with an emphasis on indicators measuring compliance with these regulations.

To take into account:

- research findings for the implementation of "avoid, reduce, compensate" measures on the impact of wind farms;
- potential intersections between priority areas for the development of strong protection and maritime traffic and, where appropriate, implement strong measures to prevent collisions between ships and marine mammals in strong protection areas offshore.

All of the EA's observations and recommendations are presented in the following section.

3. Consideration of the Environmental Authority's recommendations

Preliminary remarks on taking into account the opinion of the Environmental Authority

Several of the Environmental Authority's recommendations relate to the strategic environmental assessment report. Only those relating to the coastal strategy are discussed here.

1. Recommendations on the basis of which the coastal strategy has evolved

1-1. The EA recommends completing the file and providing all files with appropriate summaries

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A detailed summary has been included in all components of the coastal strategy to clarify the content of the various appendices (particularly Appendix 1) and establish links between the documents.

1-2. Appendix 5 presents a map of the proposed high protection zones (HPZs). The areas covered by the proposed HPZs are not included in the dossier but were provided to the rapporteur at his request, covering a total of 4,990 km², or approximately 5.5% of the coastal waters, and should be included in the dossier. The same applies to the maps, provided at the rapporteur's request, superimposing SPAs and offshore wind farm development areas, SPAs and aggregate extraction areas, and SPAs and aquaculture areas.

The façade strategy was supplemented by including the surface areas of priority study sectors for the development of strong protection, as well as overlay maps showing targeted activities. These maps illustrate the absence of overlap between the priority sectors for the development of ZPFs and the areas of aggregate extraction, offshore wind farm development and aquaculture activity.

1-3. The EA recommends supplementing the dossier with assessments of the socio-economic objectives and their indicators for the previous cycle, as well as developments and targets for the current cycle.

The environmental component of the DSF previously took the form of the Marine Environment Action Plan. This plan responded to the 2008 Marine Strategy Framework Directive, which required targets to be set. This environmental component was integrated into the DSF during the previous planning cycle and is therefore one cycle ahead of the socio-economic component.

The socio-economic component complies with the 2014 Maritime Spatial Planning Framework Directive, which does not require targets to be set. When drawing up the socio-economic objectives, which are intended to support the development of the blue economy, the decision was taken not to include targets. This choice gives greater latitude to the socio-professional actors concerned by the objectives, allowing them to adapt them to their own priorities and levers for action. Discussions on the definition of targets could be initiated during the next cycle.

The update of the coastal strategy was based on a review of the socio-economic objectives of the first cycle, a summary of which has been included in the coastal strategy in Appendix 4a of the summary document.

Some socio-economic objectives do include targets, in specific cases of indicators shared with other strategies.

1-4. The Ae recommends developing a coastal port strategy and its environmental assessment within the DSF.

Although no formal port strategy has been established, synergies between ports along the coast are already being developed. Existing initiatives and ongoing projects to build joint strategies have therefore been given greater prominence in the strategy. These include:

- The approach taken by Aquitania Ports Link, which brings together the four commercial ports on the coast (the major seaports of La Rochelle and Bordeaux, as well as the regional and departmental ports of Bayonne and Tonnay-Charente), the Nouvelle-Aquitaine Region and the Regional Chamber of Commerce and Industry;
- The expected benefits of the forward-looking mission on the future of the Port of Bordeaux for identifying levers and synergies to be developed with other ports on the coast.

Several other strategies exist (strategies specific to each major seaport, currently being updated for Bordeaux and La Rochelle), the presentation texts of which have been updated in order to better promote and encourage existing cooperation rather than aiming to formalise an additional strategy.

1.5. The Ae recommends continuing efforts to implement quantitative targets and eliminating indicators whose target is regulatory compliance in favour of indicators concerning the intensity and effectiveness of monitoring compliance.

Due to its comprehensive nature, the strategic document incorporates applicable regulations from other public policies to ensure consistency. It should be noted that certain objectives and indicators go beyond the application of other regulations in force. Examples include:

- indicator and target (D01-HB-OE05-ind2) aimed at ensuring that no new authorisations or renewals of authorisations are granted for anchoring that causes seabed abrasion, except for ecological anchoring, in eelgrass beds;
- indicator and target (D09-OE01-ind1) aiming for 100% of bathing sites to have good bathing water quality.

Other indicators have also been modified on the basis of this recommendation, with a view to ensuring effective monitoring of compliance with regulations. This is the case, for example, with the target (D01-MT-OE01-ind2) relating to the number of surveillance and/or control measures dedicated to

compliance with regulations applicable to the approach and tranquillity of marine mammals.

2. Recommendations already addressed in the coastal strategy or in other regulatory or planning documents

2-1. The Ae recommends continuing efforts towards the sustainable management of marine aggregates and clarify the situation of ZPFs with regard to the possibilities of extracting aggregates there.

It should be noted that the DSF action plan adopted in 2021 provides for the development of a guidance document for the sustainable management of marine aggregates (DOGGM) to reconcile marine aggregate extraction with the environmental and socio-economic objectives of the DSF. This document is currently being developed for the South Atlantic coastline and will therefore respond to the Ae's recommendation.

With regard to the coastal strategy, several socio-economic objectives already exist to promote a comprehensive approach to the extraction of terrestrial and marine aggregates adapted to their uses (OSE 6.1 and 6.2).

The incompatibility of this activity with the development of high-level protection has also been specified in Annex 5, based on the technical instruction of 8 September 2025 relating to the recognition of high-level protection zones in maritime areas.

2-2. The Ae recommends including analyses of per- and polyfluoroalkyl substances in the "Contaminants" determinant.

As part of the harmonised assessment of the Water Framework Directive and Marine Strategy Framework Directive, perfluorooctane sulfonic acid (PFOS) is now assessed at the coast in the main bivalve molluscs intended for human consumption (*Mytilus edulis*, *Mytilus galloprovincialis*, *Magallana gigas*). These substances are also monitored in fish caught offshore.

2-3. The Ae recommends strengthening efforts to combat the risks of spreading non-native species through aquaculture activities.

Environmental objective D02-OE04 of the coastal strategy specifically aims to limit the risks of spreading non-native species when introducing and transferring aquaculture species. The objective is that 100% of marine farming licences issued for the breeding and farming of exotic aquaculture species comply with European regulations and that there is no increase in the number of new non-indigenous species introduced through marine farming activities.

In addition, the strategy (Annex 4, OSE 2.2.2) focuses on continuing the transition to ecosystem-friendly aquaculture. To this end, it already provides for risk reduction measures.

introduction and spread of non-native species with an indicator on the number controls relating to facilities classified for environmental protection.

**2-4. The EA recommends raising the ambition level in terms of combating marine mammal mortality
marine mammals in order to achieve good ecological status in this area.**

Very common along the south Atlantic coast, certain species of marine mammals such as dolphins, porpoises and whales are emblematic of the region. Although the assessment of these species is still incomplete, anthropogenic pressures are affecting these populations. In fact, three specific environmental objectives (EO) aim to:

- Limit anthropogenic disturbance of marine mammals (D01-MT-OE01);
- Reduce accidental catches of sea turtles and marine mammals, particularly small cetaceans (D01-MT-OE02);
- Reduce collisions with sea turtles and marine mammals (D01-MT-OE03).

In addition, the DSF's action plan provides for the implementation of several measures to combat the mortality of these species:

- Identify and reduce the risks of collision between maritime transport and marine mammals along the Atlantic coast by compiling a database and setting up a system for sharing cetacean positions (action D01-MT-OE03-AN1);
- Strengthen the supervision and regulation of outdoor sports and leisure activities affecting marine mammals and commercial marine mammal observation activities (action D01-MT-OE01-AN1);
- Identify and reduce the risks of accidental capture for each species of Community interest by installing deterrents or *pingers* on fishing vessels as part of the fishing risk analysis (action D01-OM-OE01-AN1).

2-5. The EA recommends taking research findings into account when implementing "avoid, reduce, compensate" (ERC) measures on the impact of wind farms, prohibiting any irreversible decisions before the full impact is known, particularly on the seabed, marine and terrestrial birdlife, and bats.

Final decisions on the location of future offshore wind farms planned in the DSFs will be made when the necessary authorisation for the construction and operation of each structure 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 facilities on the environment and the ERC measures to be implemented to ensure that the overall environmental quality of the area is preserved, particularly for birdlife and bats. The assessment will take into account available knowledge on

birdlife and bats, in particular the results of the MIGRALION and MIGRATLANE knowledge acquisition programmes, which are due to be completed in 2025 and 2027 respectively, as well as feedback from the first offshore wind farms. Authorisations for the first offshore wind farms planned in the DSF update should be issued by 2028/2030.

2-6. The Ae recalls that projects, particularly wind farms and aquaculture projects, cannot be authorised as they stand in Natura 2000 areas (or areas likely to affect them) unless the residual impacts, after avoidance and reduction measures, are negligible, as compensation is not possible in these areas.

In accordance with the Environment Code, offshore wind and aquaculture projects likely to have an impact on a Natura 2000 site must include a Natura 2000 impact assessment in their authorisation application. This assessment must demonstrate that the project's impacts do not undermine the conservation objectives for the species and habitats that led to the designation of the Natura 2000 site.

2-7. The EA recommends implementing strong measures with regard to maritime transport, recreational boating and offshore activities in order to have a positive impact on marine environmental contamination.

This recommendation remains vague, and several responses can already be found in the action plan of the

Strategic Coastal Zone Management Plan (SCMP). For example:

- action D08-OE05-AN1 aims to limit/prohibit discharges from open-loop scrubbers (in specific areas;
- Action D08-OE04-AN1 aims to identify and equip the careening areas of marinas, mooring areas and boatyards with effluent treatment systems.

2-8. The Ae recommends strengthening noise level requirements for projects so as to achieve a negligible level of impulsive noise impact.

The façade strategy already includes an environmental objective (D11-OE01) aimed at ensuring that 100% of projects generating impulsive emissions that pose a risk of disturbance and mortality to marine mammals implement measures to reduce their acoustic impact. The reduction measures must lead to an acceptable level of impact on the environment.

More broadly, several projects have been launched by the Ministry of the Environment.

: the development of spatial and temporal noise reference thresholds for each species or group of species, monitoring of the anthropogenic environment conducted with various public institutions, including SHOM, and the publication of a guide on "underwater noise" in June 2020. With an entry presenting the thresholds for anthropogenic activities and an entry relating to noise perceived by

species and groups of species, this guide sets out guidelines on this topic. It will be updated shortly.

The subject is also addressed in the measures prescribed in the environmental permits for the projects.

2-9. The EA recommends specifying the potential impacts of socio-economic objectives on the various descriptors, based on current activities and knowledge, in order to be able to recommend appropriate ERC measures.

The analysis of the impacts of socio-economic objectives on marine environment descriptors is presented in the strategic environmental assessment on which the EA's opinion is partly based.

The French Biodiversity Agency is also developing a matrix to identify the potential impacts of activities on different aspects of the marine environment. This matrix is included in the summary document of the coastal strategy. Appropriate actions will be implemented in the operational section of the DSF based on environmental and socio-economic objectives and the initial assessment.

2-10. The EA recommends working towards a better understanding of commercial species stocks

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To assess commercial species, the Marine Strategy Framework Directive draws on the Common Fisheries Policy and stock assessments produced by national scientific bodies (for local stocks) and international bodies such as the International Council for the Exploration of the Sea (ICES), the General Fisheries Commission for the Mediterranean (GFCM) and the International Commission for the Conservation of Atlantic Tunas (ICCAT). The assessment is therefore based on the best available knowledge.

3. Recommendations requiring clarification from the project owner

3-1. OSE 8.1 on strengthening tourism potential while respecting the environment has three specific objectives. OSE 8.1.1 on developing sustainable tourism in the hinterland has uncertain impacts according to the dossier, OSE 8.1.2 on accommodation provision and OSE 8.1.3 on visitor capacity have positive impacts, which is surprising and even counterintuitive, and is justified by the SEA of the operational component of the first DSF; clarification would be useful.

By displaying this SDG 8.1 of strengthening tourism potential while respecting the environment, the coastal strategy aims to promote more virtuous tourism activity along the coast. It thus sets several specific strategic objectives:

- by prioritising innovative and sustainable tourism activities (OSE 8.1.1), the objective is to identify innovative tourism activities that adapt to the effects of climate change on the coast. The aim is therefore not to create new tourism activities but to promote activities that take these new parameters into account.

- Monitoring accommodation provision (OSE 8.1.2) and taking accommodation capacity into account in development policies (OSE 8.1.3) also aim to gain a better understanding of tourist numbers on the coast, but also to support the necessary adaptation of territories (particularly in terms of development), while respecting the environment and its resources, for example by providing local authorities with data and/or tools enabling them to take into account seasonal variations in visitor numbers and their effects (such as increased water requirements, wastewater discharge, waste treatment, etc.).

The coastal strategy thus advocates a regional project for 2050 that does not promote the development of tourism but rather the maintenance of existing activities with a transition to more sustainable tourism. In addition, improving knowledge of tourist flows and visitor numbers along the entire coastline aims to reduce their impact.

3-2. For offshore wind power, the dossier presents the issues that led to the definition of the three priority zones GGS, GGN and GGO, with various avoidance measures (...). However, SPAs and SCIs remain potentially affected by the priority zones, and a potential SPA by a connection study area.

As part of the planning work carried out in 2024, the locations selected for priority offshore wind development zones GGS, GGN and GGO (park areas) avoid any overlap with areas classified as Natura 2000 sites under the Birds (SPA) and Habitats (SCI) Directives, thus avoiding any significant impact on habitats and species under Natura 2000 regulations at the maritime planning stage.

This impact assessment will then need to be continued at the project stage by developers to ensure that their wind farm projects are compatible with Natura 2000 conservation objectives.

3-3. The awareness-raising lever is reflected in various objectives, and that of knowledge acquisition is omnipresent. Appendix 1c, under the heading "economic and social analysis of the costs incurred by marine environmental degradation", also presents the cost of marine environment management measures in mainland France in 2020, as well as for the coastline. Updated data would be desirable.

This appendix is the result of a data collection project that must be planned in advance so that the data can be analysed and the components of Appendix 1 can be produced on time. More recent data than that from 2020 is available in the summary document on the coastal strategy to supplement the analysis and trends presented in Annexes 1a and 1c.

4. Recommendations proposed for the next cycle

4-1. The Ae reiterates its recommendation to set up shared compensation systems in each of the coastal areas.

Applying the "Avoid, Reduce, Compensate" (ARC) sequence at sea is particularly complex, given the gaps in knowledge about marine ecosystems, the difficulty of quantifying impacts, the existence of numerous sources of pressure and the impossibility of mobilising certain tools applicable to the terrestrial environment.

While the "avoidance" component can be applied at the coastal planning level, the "compensation" component poses particular challenges. Marine ecological issues are very difficult to compensate for due to the time required for marine habitats to recover and the mobility of species. The habitats that can be compensated for today are the subject of experimental techniques at various stages of maturity.

The General Commission for Sustainable Development's guide to compensation in the marine environment, published in 2023, 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*". 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 these recommendations into account, the project owner will continue the discussions already underway, which could result in measures to be included in the operational section of the DSF (the action plans already include an action relating to the identification of areas that could be de-artificialised and renatured) or be integrated into the next update of the coastal strategies. A specific action relating to compensation at sea at the DSF level could be relevant, with:

- the identification of degraded sites of potential ecological interest,
- the identification of restoration operations and their planning,
- identifying which of these operations are eligible for compensation.

Nevertheless, particularly in light of the recent creation of natural compensation, restoration and renaturation sites (SNCRR), government departments must first stabilise the framework within which this work will take place. 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, one avenue that has been identified is for project developers to contribute to strengthening restoration actions in existing areas.

4-2 The Ae recommends developing a section dedicated to reducing greenhouse gas emissions from coastal activities, supported by quantitative emissions assessments and ambitious targets.

Strategic documents for the coast are gradually incorporating greenhouse gas (GHG) issues into their development and assessment. The 2050 vision for the South Atlantic coast, like the socio-economic objectives, reflects this ambition to reduce greenhouse gases, mainly through:

- the development of marine renewable energies, including offshore wind power, which contributes to the national goal of carbon neutrality by 2050;
- the decarbonisation of transport and ports through the use of alternative fuels, the electrification of quays, improvements in their energy efficiency, and multimodal transport;
- research and development in biotechnology.

In this regard, several measures in the DSF action plan adopted in 2022 are already moving in this direction

this direction (port actions, naval and nautical industry actions).

Most of the objectives do not currently have specific indicators relating to greenhouse gas trends due to a lack of available data in this specific area. This work can be undertaken gradually. At first glance, this involves:

- the general operationalisation of the SFD monitoring system in qualitative and quantitative terms (development of monitoring networks, creation of future networks for monitoring anthropogenic activities);
- the implementation of quantification methodologies by sector of activity.

5. Recommendations proposed for specific planning or training exercises

5-1. The Ae recommends that the development of aquaculture be scaled in line with its impacts and the feasibility of the ERC sequence.

5-2. The Ae recommends taking into account the effects of aquaculture on ecosystem contamination as an indirect impact on Natura 2000 sites.

5-3. The Ae recommends taking into account the effects of aquaculture on forage species and ecosystem contamination as an indirect impact on Natura 2000 sites.

The recommendations relating to the development of aquaculture will be taken into account in aquaculture planning work, in particular when defining the criteria for identifying areas suitable for aquaculture development.

The recommendations relating to the risk of contamination are intended to be taken into account by the investigating authorities (departmental directorates for population protection or departmental directorates for territories and the sea).

The strategic environmental assessment mainly refers to the impact on the destruction of marine, coastal and wetland benthic habitats, as well as the disturbance of amphihaline fish and seabirds. In the assessment of pressures for the inventory under the Water Framework Directive, shellfish farming is indeed included among the hydromorphological pressures. In the absence of a defined threshold at this stage, the assessment is based on expert opinion.

5-2. The Ae recommends clarifying the situation of ZPFs with regard to maritime traffic and, where necessary, implementing strong measures to prevent collisions between ships and marine mammals in high protection zones offshore.

This recommendation will be taken into account in the work that will be carried out on a case-by-case basis for proposals to designate areas. If the analysis of pressures specific to the area reveals risks of collision with marine mammals, measures to eliminate/reduce this risk will be studied.

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

1. Public participation by electronic means

Public participation via electronic means was summarised in a report entitled "*Public comments and proposals, indicating those that were taken into account*", in accordance with Article L. 123-19-1 of the French Environment Code. It can be viewed at the following link:

<https://www.dirm.sud-atlantique.developpement-durable.gouv.fr/le-volet-strategique-du-dsf-la-strategie-de-facade-a1465.html>

2. Consultation with authorities

Procedures

In accordance with Article R. 219-1-10 of the Environmental Code, draft strategies for have been submitted for review:

- *the coastal maritime council;*
- *the National Council for the Sea and Coastlines;*
- *regional councils and coastal departmental councils;*

- *public establishments for inter-municipal cooperation or joint associations responsible for developing coastal territorial coherence plans;*
- *basin committees;*
- *regional biodiversity committees;*
- *regional sea fishing committees;*
- *the Chief of Staff of the French Navy;*
- *to the coordinating prefects of neighbouring coastlines.*

This consultation took the form of a letter sent by the coordinating prefects to each of the above-mentioned bodies. The consultation ran from 5 May to 5 August 2025. Opinions were to be submitted within three months, failing which they would be deemed favourable.

The file made available for consultation included:

- The draft coastal strategy;
- The environmental impact report and its non-technical summary, as part of the environmental assessment;
- The opinion of the Environmental Authority;
- A memorandum of proposals for taking the Authority's opinion into account. environmental;
- The summary and report of the public debate "La mer en débat" (The Sea in Debate);
- The ministerial decision of 17 October 2024 following the public debate "La mer en débat" and specifying the conditions for continuing to update the SFMs;
- The report on the ongoing consultation by the National Commission for Public Debate;
- The addendum added following the announcements made at the third United Nations Ocean Conference.

Main recommendations and amendments made to the coastal strategy

Fourteen bodies responded to this consultation phase on the coastline, namely the National Council for the Sea and Coastlines, the two basin committees, the Maritime Council for the Coastline, the Regional Biodiversity Committee, the Landes and Gironde departmental councils, the Haute Gironde Blaye Estuaire SCOT, the Ile de Ré community of municipalities, the La Rochelle Aunis SCOT, the Royan Atlantique urban community, the Nouvelle-Aquitaine regional committee for sea fishing and marine farming, the French Navy headquarters and the coordinating prefects for the North Atlantic-Western Channel coastline.

Thirteen contributions were in favour of adopting the South Atlantic coastal strategy, some with recommendations or reservations. Only one opinion was unfavourable to the adoption of the draft coastal strategy. This was the opinion of the Ile de Ré community of municipalities, which justified its position by citing what it considered to be insufficient information on the plans to build offshore wind farms off the coast of Ile d'Oléron and by

the location of their "constructions" within the Gironde Estuary Marine Nature Park and the Pertuis Sea.

In general, the authorities welcomed the gradual and iterative updating of the coastal strategy and the involvement of stakeholders at each stage. Some opinions present a general view on the coastal strategy and its annexes. Other contributions focus on specific points that are the subject of requests for amendments. Several bodies emphasise that the coastal strategy is an essential framework for anticipating, regulating and reconciling maritime uses by 2050, while respecting the marine environment.

- **Structuring and dissemination of the coastal strategy**

Some bodies regret the absence of an assessment of the previous cycle in the overview of the coastal strategy. They question the updating and harmonisation of the reference data used in the document and suggest that efforts should be made to simplify or popularise it in order to improve understanding of the document.

As several contributions point out, the strategy review has been greatly expanded as part of the update and has become more precise, particularly in the description of activities. However, this assessment remains incomplete, particularly with regard to the environmental aspect, due to the lack of precise data for assessing the ecological status of marine waters and the environmental impact of human activities.

Following the consultation phase, a review of the previous cycle was incorporated into the coastal strategy, focusing on strategic environmental and socio-economic objectives. These reviews, included in Appendices 4a and 4b, made it possible to update the objectives for this cycle in light of new challenges and to make them clearer, more operational and easier to evaluate.

With regard to the updating of the data used, Appendix 1 brings together the economic and social analysis of marine water use (Appendix 1a), the technical and scientific summary of the assessment of the ecological status of marine waters and associated pressures (Appendix 1b) and the economic and social analysis of the costs incurred by the degradation of the marine environment (Appendix 1c). This appendix is the result of a major data collection project under the Marine Strategy Framework Directive. This project takes into account the best data available at the time of its completion in 2022 and has not been updated since. However, the data from the summary document has been updated, particularly in relation to the updated information on certain socio-economic sectors and the conclusions of the public debate "La mer en débat" (The sea under debate).

Changes have also been made to improve the document's readability. Summaries have been added, as well as references to items in the appendices, and some explanatory diagrams have been updated.

- **Enforceability of the DSF and coordination with planning documents**

Several bodies have requested clarification of the links between the Water Development and Management Master Plan (SDAGE) and the DSF. They would like the enforceability of the DSF to be clarified and recommend continuing to align the environmental objectives of the DSF with those of the SDAGE.

The section on the enforceability of the DSF has been completely rewritten to clarify the links between the documents and make them easier to understand. From now on, the dedicated section in the summary document specifies the legal framework and identifies which documents must be compatible with the coastal strategy and which documents must take into account the coastal strategy document in its entirety.

These amendments also clarify the links with the SDAGE, reiterating that the compatibility report is reversed and that it is the environmental objectives that must be compatible with the provisions of the SDAGE. These elements are also specified in the summary of public participation by electronic means.

In terms of aligning the environmental objectives of the DSF with the provisions of the SDAGE, joint work is being carried out between the DIRM and the water agencies, which ensure mutual compatibility and collaborate on updating the DSF and SDAGE.

- **Land-sea link and inter-coastal consistency**

The authorities are calling for the land-sea link to be given greater consideration in the coastal strategy. They emphasise the importance of upstream-downstream responsibility, pointing out that the quality and quantity of fresh water are important issues for coastal activities. They also call for links to be forged between land and sea planning documents. Some authorities advocate for greater mutual acculturation between land-based and maritime stakeholders in order to ensure that the objectives of the DSF are operationalised in the territorial strategies of the river basins. The authorities also suggest continuing to develop indicators that are common to those of the Water Framework Directive (WFD), with the establishment of shared protocols for data acquisition, processing and storage.

The subject of the land-sea link has been further developed in the coastal strategy, in particular to include in the document the principle of continuity between the river basin and the coastal marine environment. These elements can be found in particular in:

- the inventory, which specifies that socio-economic activities are responsible for good water quality, and presents the existing monitoring networks and the ecological role of wetlands;
- the vision for 2050, which emphasises the need to develop upstream-downstream solidarity and the consequences of freshwater abstraction on the volume and quality of coastal waters;
- the environmental objectives, for which two complementary indicators relating to the reduction of coastal waste disposal and the volume of freshwater abstracted in the coastal sector have been included;

- the cartographic atlas, to which a map of coastal wetlands has been added.

In terms of mutual acculturation, this project will be further developed beyond the coastal strategy with the relaunch of the work of the specialised "land-sea link" commission. This joint coastal maritime council/basin committee brings together maritime and land-based stakeholders and deals specifically with land-sea link issues.

With regard to assessments under the Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD), it should be noted that a joint WFD/MSFD assessment already exists for descriptors D8 – contaminants and D5 – food webs.

Marine Strategy Framework Directive (MSFD), it should be noted that a joint WFD/MSFD assessment already exists for descriptors D8 – contaminants and D5 – food webs. This assessment provides the same assessment results for the same body of water.

Some contributions highlight the importance of coordination between the South Atlantic and North Atlantic-Western Channel coasts to ensure that marine issues are addressed in a consistent manner across the Bay of Biscay and to respond to the interdependence of marine environments.

This coordination is essential in order to respond to the interdependence of marine environments, and is ensured in particular through the Technical Secretariat of the Action Plan for the Marine Environment common to both coasts, which brings together government departments and scientific and technical experts.

- **Environmental preservation**

Several contributions call for the chapter on the development of high-protection areas to be updated, particularly following the announcements made at the third United Nations Ocean Conference (UNOC) in June 2025 on the protection of the seabed. Details on the application of the European regulation on nature restoration are also requested.

A paragraph dedicated to the implementation of the European regulation on nature restoration has been added to the summary document. It mentions the targets and timelines set out in the regulation and presents the ongoing development of the national plan for nature restoration.

This same document and Annex 5 on the development of high protection zones have been rewritten to take into account the announcements made within the framework of the UNOC and the publication, in September 2025, of the technical instruction of 8 September 2025 on the recognition of high protection zones in maritime areas. Following these announcements, a strategy dedicated to the protection of the seabed identifies additional areas to be proposed for certification by the end of 2026. These areas complement the study areas identified in the ministerial decision of 17 October 2024 following the public debate "La mer en débat" (The sea under debate). A map superimposing these areas has been added to the document.

Some contributions call for estuaries to be given special protection, particularly as migration areas for amphihaline species.

Estuaries are clearly identified in the summary document as a land-sea interface area that is particularly rich in biodiversity and presents many challenges for amphihaline species (habitats, nurseries, spawning grounds). An analysis of the challenges relating to migratory fish is also presented in the appendix to the coastal strategy.

- **Environmental and socio-economic objectives, associated indicators and targets**

Several bodies have requested that the indicators for socio-economic or environmental objectives be specified (control indicators, quantitative targets). They also question the absence of targets for socio-economic objectives (OSE).

Certain indicators have been added or amended following requests from the authorities. This is particularly the case for the socio-economic objectives and associated indicators for the risks and tourism section, in order to incorporate changes in public policy on coastal development and take climate change into account.

With regard to socio-economic objectives (SEOs), it was decided not to add targets. This choice gives greater latitude to the socio-professional actors concerned by the objectives, allowing them to adapt them to their own priorities and levers for action.

Several bodies note that efforts have been made to strengthen the consistency of SDGs with environmental issues, but question the fact that socio-economic objectives are not systematically linked to ecosystem preservation. It has also been recommended that pathways be developed for achieving environmental objectives (EOs).

With regard to the link between ecosystem preservation and socio-economic objectives, this recommendation has already been largely taken into account in the updating of socio-economic objectives, for which a relationship with environmental objectives has been established as far as possible. Matrices presented in the summary document (with reading precautions) also make it possible to identify some of the impacts of human activities on the environment. The objectives (whether environmental or socio-economic) of the strategy are inseparable and cannot be contradictory.

The trajectories for achieving the OE targets are also covered by the actions described in the operational section of the DSF.

- **Description of activities**

Several bodies have reported inaccuracies or requested additional information in the description of the activities of the façade.

In addition to the adjustments specified in the section on "public participation by electronic means", several texts describing the activities of the façade have been updated, in particular:

- the text relating to ports and maritime transport to promote existing synergies and joint initiatives between the four commercial ports, such as Aquitania Ports Link. This text has also been expanded to mention the need for temporary mooring areas for offshore wind turbine floats, planned off the coast of the major seaports. This update to the text also provided an opportunity to mention the forward-looking mission on the future of the Port of Bordeaux, launched in May 2025 by the regional prefect and local authorities.
- the vision for 2050 to identify marinas as economic players driving ecological, energy and digital transition, following the example of fishing and commercial ports.
- The text on commercial fishing has been updated to more accurately reflect the situation and challenges specific to the sector. The port of Capbreton, the only fishing port in the Landes region, has also been given greater prominence in the inventory.
- the text on marine renewable energy production to highlight marine renewable energy sources other than offshore wind power. In this regard, experimental projects and studies conducted to explore the potential of wave and tidal energy on the coast of the Basque Country, Charente-Maritime and Gironde are cited.
- the text on recreational boating to indicate that the roll-out of the "Clean Ports" certification for marinas on the coast should be continued.
- The section on coastal risks has been updated to take into account the latest developments, in particular the work currently underway to map coastal changes over the next 30 and 100 years.
- the future of the Blayais power plant, which has been specified in the outlook for the development of activities in zone 1 of the vocational map (Appendix 8) to take into account the investments made to extend its lifespan.
- Annex 4E, which was created to establish the link between the strategic objectives, the national strategy for the sea and the coastline, and the vision for 2050.

- **Mapping**

Some authorities have requested that the cartographic elements be clarified.

In addition to the elements mentioned above, other maps have been added to Appendix 10 following this consultation phase, including a map of energy projects across the entire Atlantic coast.

Certain maps have been clarified, such as:

- the maps of potential uses, which now include the GILA and France-Spain interconnection projects;
- the map relating to knowledge and research centres, to which certain sites on the Médoc coast have been added;
- zoomed-in socio-economic maps by sector of activity, on which certain locations have been corrected,

- the map relating to heritage protection, on which the properties listed as UNESCO World Heritage Sites (Vauban Fortifications - Blaye Citadel, Fort Pâté and Fort Médoc - and Saint-Martin-de-Ré) have been specified,
- the map relating to commercial sea fishing, on which the "main fishing areas" no longer stop at the 3-mile limit.

- **Taking climate change and its effects into account**

Several bodies note that, for this cycle, the issue of climate change and its impacts is better integrated into the coastal strategy, particularly from the perspective of coastal adaptation. The bodies call for this exercise to be continued in order to achieve collective ownership of these issues and to seek concrete solutions and actions.

Although based on current knowledge and referring mainly to ad hoc policies on the subject, the façade strategy has in fact taken greater account of the effects of climate change, with a dedicated section in the 2050 vision ("Resilient coastal areas in the face of climate change") and socio-economic objectives that integrate this issue from the perspective of adaptation and coastal risks. The paragraph on coastal and maritime tourism also addresses adaptation to climate change, citing the support measures undertaken by the Littoral Public Interest Group (GIP) with local authorities. The operational approach will be developed in the action plan. This topic has already been identified as one of the main themes of the next planning cycle.

- **Improving knowledge of the sea and the coastline**

Several contributions emphasise that the coastal strategy also includes improving public knowledge about the sea and marine biodiversity. They recommend that targeted actions to improve knowledge be identified in the next action plan.

There are gaps in the assessment of the good ecological status of certain compartments of the marine environment, which can be explained in particular by the need for increased and ongoing research to understand this space over time and by a lack of methodological stabilisation, which makes it impossible to compare different cycles. However, the process of updating the FSD is one of continuous improvement, evolving in line with the state of knowledge and available data. The socio-economic objectives have been revised accordingly:

- 12.1.1 Improve knowledge of the impacts of human activities on land on the marine environment, the coastline and the hinterland;
- 12.1.2 Improve knowledge of the effects of climate change and global changes and their impacts on the territory;
- 12.1.3 Promoting research in the fields of DSF.

- **Cumulative effects and compensation at sea**

Several bodies regret that a thorough and systematic assessment of the cumulative effects of various human activities on biodiversity has not been implemented in the same way as compensation at sea.

To date, there is no method for modelling cumulative effects at the scale of one or more activities. Research has been undertaken at national level, particularly on offshore wind power, to provide project developers and government departments with a method for assessing these cumulative effects. Details of this project are set out in the summary of public participation by electronic means.

With regard to the "Avoid, Reduce, Compensate" (ARC) sequence, this topic was addressed in the Environmental Authority's opinion in point 4-1.

3. Cross-border consultations

- a. 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 activities listed in the convention that are likely to have a significant adverse transboundary impact. In this context, 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 has been created on the PPVE public participation platform: <https://jeparticipe.expertises-territoires.fr/processes/PPVESFM2025/f/165/>.

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

b. Lessons learned from the consultations

As part of this consultation:

10 countries submitted opinions to the French authorities (Italy, Belgium, Jersey, Guernsey, the United Kingdom, Norway, the Netherlands, Sweden, Denmark and Spain).

The feedback received mainly concerned the methodology used in the environmental assessment of the areas identified for the construction of future offshore wind farms. Clarification was also requested on the approach taken 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 topics was not addressed in the review of coastal strategies.

The analysis of the contributions concludes that

- that there is no need to make substantial changes to maritime strategies in light of the comments made;
- that some contributions do not directly concern the content of the coastal strategies themselves, but call for consideration by the French government services in the context of the overall management of the various maritime public policies;
- that certain comments leading to minor adjustments can be taken into account;
- that clarification is needed on how the revised coastal strategies are developed revised coastal strategies.

The last two points are addressed in the following paragraphs concerning Spain's feedback on the draft South Atlantic coastal strategy.

• **On the marine environment inventory included in the 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 designated use, 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 define precisely the percentage of GES achieved at the level of a designated area. Assessments are carried out on 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 areas of use. Some of the assessments are sometimes inconclusive for **all** or part of the coastal areas, although significant progress has been made in relation 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 current situation and good environmental status for the issues considered, at the level of the functional areas. However, this work has significant methodological limitations and must be approached with caution.

With regard to details of the impacts 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.

- **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

Strong protection is defined by Decree No. 2022-527 of 12 April 2022. It is not a new legal status but rather a "labelling" system designed to highlight 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 affecting each coastline.

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

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. It can be consulted at the following link:

<https://www.bulletin-officiel.developpement-durable.gouv.fr/documents/Bulletinofficiel-0034189/TECL2525202J.pdf>

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 regions, taking into account the specific characteristics of their biodiversity and the level of human activity they host.

Thus, in order to achieve the above-mentioned targets, study areas 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 the protection of 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 participation platform

public in order to clarify these announcements.

To find find out more:

https://www.ecologie.gouv.fr/sites/default/files/documents/250608_unoc-biodiversite_web_DP_AMP.pdf

Thus, coastal strategies now include a development path for strong coastal protection with a view to achieving the targets set by national strategies. These coastal strategies have been the subject of so-called 'downstream' consultations, based on their consolidated versions. 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 the issues at stake.

"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 on the coastline through consultation bodies.

High protection zones are intended to be designated as a priority within marine protected areas. The procedure for recognising high protection zones thus 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 their managers. The management procedures are set out in a management document and discussed within dedicated bodies. Depending on the location of the area, these bodies may include representatives of institutions or stakeholders from neighbouring states.

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 Environment 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 during its update in terms of its structure, vision, strategic objectives, map of uses, planning of high protection zones and offshore wind farm planning.

This report can be consulted via the following link:

<https://www.dirm.sud-atlantique.developpement-durable.gouv.fr/le-volet-strategique-du-dsf-la-strategie-de-facade-a1465.html>

In order to take into account the various contributions from the public, authorities and neighbouring countries, it was decided to:

- revise the presentation of the documents by adding summaries and reviews of the previous cycle to improve public understanding;
- clarify the wording relating to the enforceability of the DSF and its relationship with other planning documents;
- reformulate the descriptions of socio-professional activities along the coast (professional fishing, ports and maritime transport, recreational boating and water sports, marine renewable energy, defence, coastal tourism and coastal risks) to provide more details on the challenges and situation facing these sectors;
- highlight certain specific features of the coastline in the cartographic atlas with the creation of additional maps;
- specify the environmental and socio-economic objectives by creating or modification of more operational and assessable indicators and targets;
- complete the thematic annexes, in particular the one on the development of strong protection and the one on aquaculture planning;
- develop the subject of the land-sea link through expectations relating to upstream-downstream solidarity and the quality and quantity of fresh water flowing into marine waters;
- rewrite certain appendices and adapt the preamble to link the main document to the appendices and make the document more readable, educational and easily understandable.

These choices were made in accordance with the balance that enabled the coastal strategy to be defined in a concerted manner.

Some contributions concerned public policies not supported by the DSF and were therefore not included.
not been included.

Finally, other contributions cannot be taken into consideration in the short term in the as part of the SFM update, but will inform the work for future updates.

V. Measures measures to evaluate the impacts on the environment of the implementation of the plan or document

The environmental report prepared as part of the environmental assessment shall, in accordance with Article R. 122-20 of the Environment Code, set out the arrangements for monitoring the environmental impact of the plan/programme. 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 coastal zone management document includes a section specifically dedicated to the methods for evaluating its implementation. This section, entitled "monitoring mechanism" is included in the "operational" section of the coastal strategy document, adopted after the coastal strategy. This monitoring system specifies the surveillance and monitoring systems put in place to track changes in the state of the marine environment as part of the assessment of good environmental status, as well as to monitor and evaluate 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.