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**Our Ref:** 20026727

**Your Ref:** EN010012

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**By email only**

Dear Ms McKay

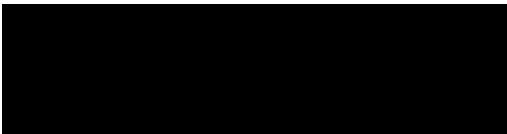
**Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 10: Comments on Deadline 8 Submission - 9.110 Sizewell C European Sea Bass Stock Assessment - Revision 1.0**

**Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for the Sizewell C Project**


For Deadline 10 (12th October) the Examining Authority (ExA) have requested comments on additional reports submitted by NNBSGenCo (SzC) Ltd at Deadline 8. We wish to provide comments on the following report [REP8-131] Deadline 8 Submission - 9.110 Sizewell C European Sea Bass Stock Assessment - Revision 1.0.

Our detailed comments are contained in Annex A of this response. In summary, the report and stock assessment method does not address the Environment Agency concerns over using the ICES stock area of assessment. In addition we consider the applicant's Equivalent Adult Value (EAV) method should take the repeat spawning of the adults into consideration.

Yours sincerely



Simon Barlow  
Project Manager  
Sizewell C Nuclear New Build  
Environment Agency



## Appendix A: Environment Agency comments on 9.110 European Bass Stock Assessment - Revision 1.0

Document Title	Paragraph number	Issue	Comment	Suggested solution
SZC_Bk9_9.110_Sizewell_C_European_Sea_Bass_Stock_Assessment	Figure 3	The stock assessment method does not address the EA concerns over the area of assessment. Using the ICES stock assessment areas assumes an area for European seabass of 608,983 km <sup>2</sup> .	Recent papers, including Stamp et al (2021), Identifying juvenile and sub-adult movements to inform recovery strategies for a high value fishery - European bass ( <i>Dicentrarchus labrax</i> ) which shows high site fidelity of juvenile and sub-adult European seabass.	Need to provide an assessment at an appropriate local scale for the European seabass that recognises the latest research into site fidelity and seabass movement and the likelihood of local populations that could be impacted by SZC.
SZC_Bk9_9.110_Sizewell_C_European_Sea_Bass_Stock_Assessment	Section 1.2.2 and Figure 1	Years of stock assessment versus health of seabass fishery.	The stock assessment has included years from 1985-2020 however it has not taken into account the most recent stock assessment and fishery advice which shows that the stock is currently below safe limits.	The analysis needs to include the current state of the stock in the assessment and the assumption of a 50 year lifetime of the plant acting on a stock that is currently at the lowest safe limits
SZC_Bk9_9.110_Sizewell_C_European_Sea_Bass_Stock_Assessment	Executive Summary and Section 1.1.1	This section starts by stating that "Sea bass is a long-lived, repeat spawning species." It also states that "fishing mortality is targeted at the 4-15 year old fish."	The applicant's EAV method does not take the repeat spawning of the adult seabass into consideration. If the ICES data shows that the fishery is targeting fish up to 15 years old, then it is apparent that repeat spawning is occurring in this species and should be accounted for.	Please use the EA EAV method to the seabass impingement assessment.

<p>SZC_Bk9_9.110_Sizewell_C_European_Sea_Bass_Stock_Assessment</p>	<p>Table 2</p>	<p>This table only presents the results for a short subset of the assessment period but does show that in two years, the SZC impingement has actually resulted in an increase in SSB.</p>	<p>This is very counter-intuitive and does not make sense that an additional pressure would increase biomass.</p> <p>This is especially problematic when it occurs in the more recent years when the SSB is already at or below the biological safe limit below which there is a high risk that recruitment will be impaired.</p>	<p>The results for all years and scenarios aren't shown as clearly so are difficult to assess. But, it does highlight an apparent problem with the method when additional mortality has the opposite effect on the SSB values.</p>
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