

THANET FISHERMEN'S ASSOCIATION.

Gareloch,
37 Victoria Parade,
Ramsgate,
Kent.
CT11 8AJ.

15.01.19

Abbreviated version.

Thanet Fishermen's Association Written Representation for TE application.

Thanet Fishermen's Association (TFA) is a voluntary organisation, with its core fleet in Ramsgate Harbour, and acts on behalf of its members based along the North Kent Coast. The TFA vessels are mainly under 10 meters in length, non-nomadic and work within 20-25 miles of their harbours.

The applicant has had good communication with TFA, but we must stress that the conclusions on impacts are far lower than we consider representative.

TFA and its Fishermen are not against offshore wind energy, but the progress of wind energy should not be to the detriment of a smaller industry, nor impact its ability to make a daily living.

The Commercial Fisheries Technical Report has been written with considerable input from TFA and is an acceptable document in as much as it has identified the fleet that use the area, the methods used, species targeted.

TFA Fishermen proposed the Succorfish tracking project for 15 of its vessels in an effort to provide good data but it is reliant on good interpretation. We would agree that the TE area is used as a transit area but not that it's used for transit rather than fishing.

**Environmental Statement, volume 2 chapter 9: Commercial Fisheries 9.5
Assessment criteria and assignment of significance.**

We feel the assessment criteria are not representative and dispute temporary loss of ground.

Significance criteria: Sensitivity, Magnitude and Impact significance.

We agree in the SoCG that the receptors have been correctly identified by fleet and principle method. TFA understands the need for the significance criteria to be set out as they are, however, we do not think these have been correctly applied and disagree with the end results.

Table 9.6 The Inshore fleet fit the criteria of 'Very high'. Most vessels can only deploy one gear type at a time. The cost of switching method is significant. Not every inshore vessel is licensed to pursue every method.

9.7.2 Surveillance sightings do not accurately describe the levels of Fishing activity and TFA disagrees that this surveillance can even be used to indicate proportions of activity by gear type.

TFA maintains that the TE footprint will be lost entirely to some fishing methods and only partially returned for others.

9.17.7 states that the RLB was reduced as a result of consultation but TFA would suggest that the RLB was altered largely for navigation.

9.17.9 TFA disagree with the magnitude of the effect of this lost ground being assessed as low. TFA vessels drift the TE area frequently. The frequency with which certain grounds are used signify favoured grounds based on the fish they produce and accessibility for the fleet. The way that specific drift grounds are used has not been considered properly. It is probable that safety zones would stretch a further 500m outside the RLB, increasing the loss of ground.

9.17.11 The sensitivity and magnitude level for local vessels is incorrect, as is the overall significance conclusion of low minor at **9.17.14**. The two main areas of Lobster/ Crab ground are within/around, the TE development area. Alternative grounds are already utilised by other vessels. These boats have limited adaptability and limited spatial tolerance due to their dependence on a single ground. The conclusion for the Lobster and Crab potters should be high/very high.

9.17.15 UK demersal trawlers.

Grounds within TE are consistently worked by trawlers operating from Ramsgate and Whitstable. The conclusion of minor adverse at **9.17.14** is not accepted.

9.17.39 TFA disagrees with this statement on safety. Multiple incidents have occurred but not due to Fishermen.

Increased steaming times to fishing grounds

TFA agrees that the impact on steaming times during construction will be reduced if vessels are allowed access.

Interference with fishing activities

9.17.19 TFA would add that during previous construction projects incidents have occurred that were clearly in breach of COLREGS.

9.17.52 TFA has had good engagement. TFA are encouraged to see mitigation noted. TFA does not agree that because mobile gears have the ability to move their sensitivity is medium, nor with point **9.17.54**.

9.17.56 TFA disagrees with the conclusion of minor adverse for the loss of ground during construction. Specific grounds for each method of fishing are limited. The loss of Lobster/Crab potting and bottom drifting ground will result in Fishermen attempting to compete for ground that is already worked. The conclusion of minor adverse takes for granted that mitigation can be reached. TFA has always maintained that the domino effect created by displacement affects all of its Fishermen.

TFA disagrees with the long-term conclusions for each section of the O&M phase, none of which are above minor adverse. The explanations given at each point for the construction phase, are relevant for the O&M phase. The conclusions on cumulative impact are not accepted.

TFA considers the loss of ground will be permanent to multiple Fishing methods once construction begins and the impact of the Thanet Extension project will be significant on its Fishermen.

Yours sincerely,

TFA Chairman: Peter John Nichols
TFA Secretary: Thomas H Brown MBE
TFA Treasurer: Merlin W Jackson

