



To whom it may concern,

This written representation forms the response from the NFFO and WFA-CPC to key documentations of concern to the fishing industry as part of the examination of the Morecambe offshore wind project generation assets.

The National Federation of Fishermen's Organisation (NFFO) represents the interests of over 400 commercial fishing businesses in England and Wales. The Welsh Fishermen's Association (WFA-CPC) represents over 200 commercial fishing businesses in Wales.

Please treat this written representation as a joint representation from both the NFFO and the WFA-CPC.

The response below is in response to specific comments we have with regards the outline Fisheries Liaison and Co-existence Plan (FLCP).

### Fisheries Liaison and Coexistence plan

It is acknowledged that this document is merely an outline that will aid in the development of the final FLCP. Roles and responsibilities for each sector need including and highlighting what is expected of each sector through each of the phases.

**Paragraph 6.** The FLCP covers the whole period between construction and decommissioning, we would expect to see a review schedule to ensure the FLCP is appropriate and relevant throughout the lifetime of the Morecambe project. We acknowledge the commitment is stated in **Paragraph 10** but we are unclear on what is meant be periodically reviewed.

**Paragraph 11.** The FLOWW guidelines are in a process of being updated. Suggest altering text to reflect use of the latest guidelines where available.

**Table 3.1.** Suggest adding dissemination of NTMs to the FLO role, the responsibility for this normally sits with the FLO rather than an FIR. Or at least ensure NTMs are sent to FIR for dissemination. We request that local OFLOs are used wherever possible, this helps mitigate and deconflict issues quickly as they arise due to local expertise.

**Paragraph 16.** The role between FLO and FIR is unclear in this section. It is stated that the FLO is the main point of contact but the FIR for day-day contact – clarity is needed on who fisheries stakeholders should contact when needed.

**Paragraph 17.** We support the inclusion of allowing fisher access to the Marine Operations Handbook.

**Paragraph 18.** I don't see the relevance of this statement in this section of the FLCP.

**Table 3.2.** We support the minimum notification period of 2-weeks given for the activities here.

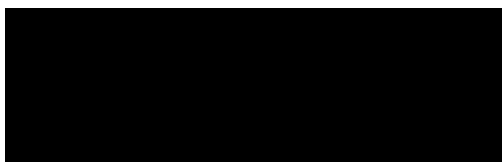
**Paragraph 21.** We recommend the use of **local** guard vessels wherever possible when a need for guard vessels arises. This helps mitigate and deconflict issues quickly as they arise due to local expertise being on site.

**Paragraph 23 and 24.** See earlier comment on updated FLOWW guidelines (**Paragraph 11**).

**Paragraph 26.** We welcome the approach taken to conduct an In Principle Monitoring Plan. However, there is no guidance on what will process will be followed if the monitoring highlights a significant change in fisheries behaviour in response to the Morecambe wind farm site. This would need developing and including in the final FLCP.

## Further comment

There is growing concern on the reliability of the modelling used by offshore developers regards cable burial and the chance of cable exposure over the lifetime of the project. It has been demonstrated at several operational wind farms that the target burial depth during construction has not been of sufficient depth resulting in remediation. There have been sites with extensive areas of cables exposed within an array that has resulted in a monitor only approach as opposed to remediation or mitigation measures. We would expect to see a commitment from the developer to remediate any cable exposures as soon as possible, if this is not the case the risk to fisheries stakeholders completely negates the return to fish mitigation during the operational phase.



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National Federation of Fishermen's Organisations