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**RWE Renewables UK Dogger Bank
South (West) Limited**

**RWE Renewables UK Dogger Bank
South (East) Limited**

Dogger Bank South Offshore Wind Farms

Environmental Statement

Volume 7

**Appendix 13-1 Commercial Fisheries Consultation
Responses**

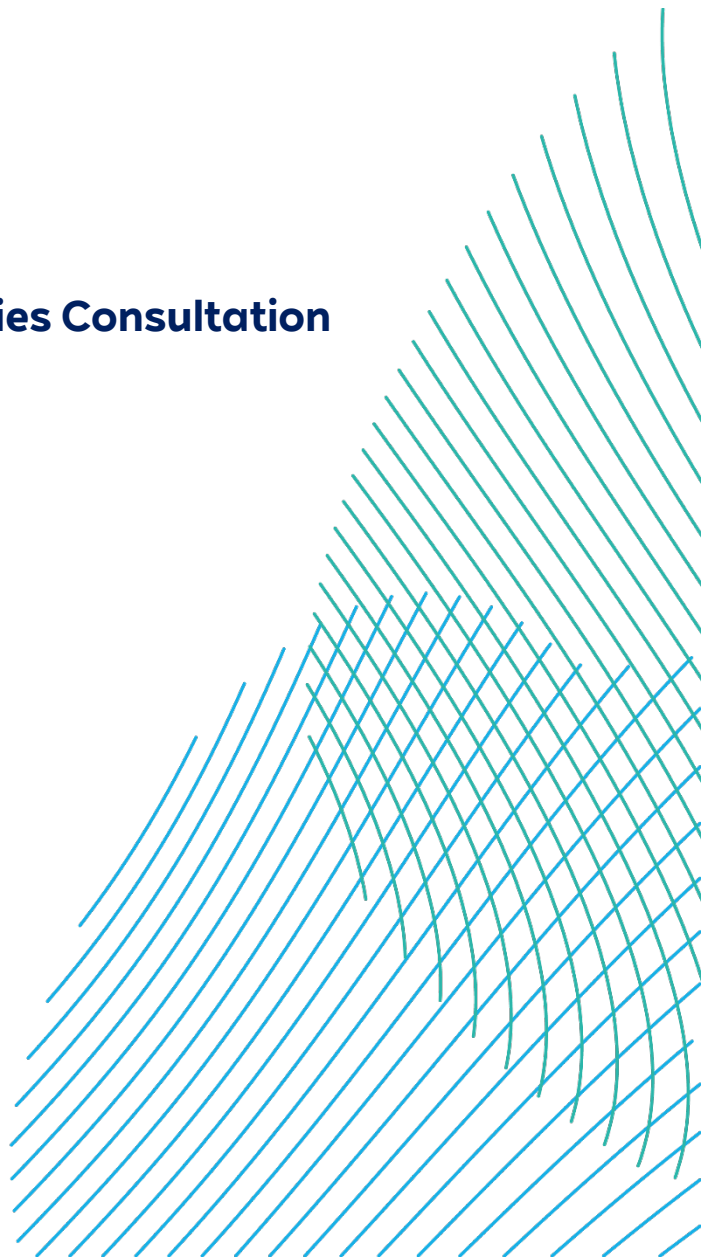
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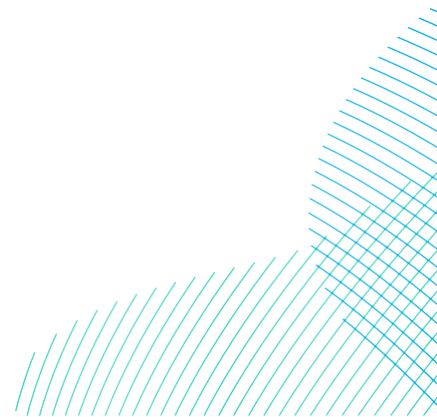
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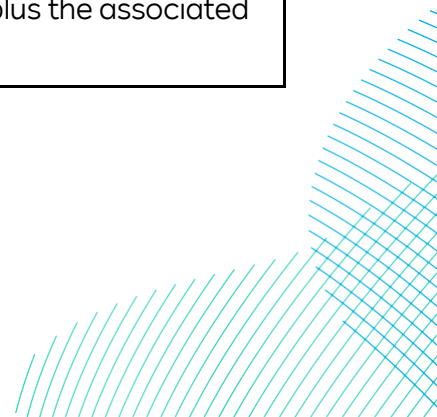
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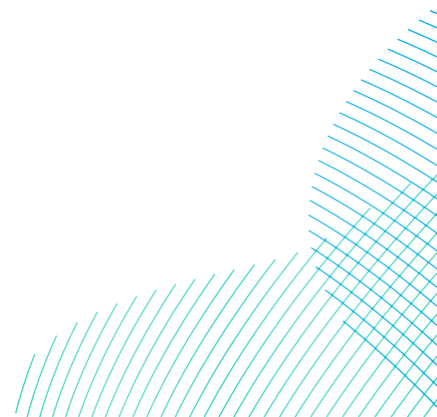
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Glossary

| Term | Definition |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Array Areas | The DBS East and DBS West offshore Array Areas, where the wind turbines, offshore platforms and array cables would be located. The Array Areas do not include the Offshore Export Cable Corridor or the Inter-Platform Cable Corridor within which no wind turbines are proposed. Each area is referred to separately as an Array Area. |
| Array cables | Cables which link the wind turbine generators to the offshore converter/ collector platform(s). |
| Cumulative Effects Assessment (CEA) | The assessment of the combined effect of the Projects in combination with the effects of a number of different (defined cumulative) schemes, on the same single receptor/resource. |
| Dogger Bank South (DBS) Offshore Wind Farms | The collective name for the two Projects, DBS East and DBS West. |
| Fisheries Liaison Officer (FLO) | Primary contact point between the fishing community and the Applicant, with responsibility for disseminating relevant Project information. |
| Inter-Platform Cable Corridor | The area where Inter-Platform Cables would route between platforms within the DBS East and DBS West Array Areas, should both Projects be constructed. |
| Inter-Platform Cables | Buried offshore cables which link offshore platforms. |
| Landings | Quantitative description of amount of fish returned to port for sale - can be defined in terms of value or weight. |
| Offshore Development Area | The Offshore Development Area for ES encompasses both the DBS East and West Array Areas, the Inter-Platform Cable Corridor, the Offshore Export Cable Corridor, plus the associated Construction Buffer Zones. |



| Term | Definition |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Offshore Export Cable Corridor | This is the area which will contain the Offshore Export Cables (and potentially the ESP) between the Offshore Converter Platforms and Transition Joint Bays at the landfall. |
| Offshore Export Cables | The cables which would bring electricity from the offshore platforms to the Transition Joint Bays (TJBs). |
| Safety zones | Legislated under the Energy Act 2004, safety zones are rolling buffer areas which protect construction activities by preventing unauthorised vessels from entering their boundary. |
| Scoping opinion | The report adopted by the Planning Inspectorate on behalf of the Secretary of State. |
| Scoping report | The report that was produced in order to request a Scoping Opinion from the Secretary of State. |
| The Applicants | The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake). |
| The Projects | DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms). |
| Vessel Monitoring System (VMS) | Satellite tracking system using a device on a vessel which transmits the location, speed and course of the vessel. |



Acronyms

| Term | Definition |
|--------|----------------------------------------------------------------|
| CEA | Cumulative Effects Assessment |
| CFWG | Commercial Fisheries Working Group |
| CNPMEM | Le Comité national des pêches maritimes et des élevages marins |
| DBS | Dogger Bank South |
| EMF | Electromagnetic Fields |
| ES | Environmental Statement |
| FLOWW | Floating Offshore Wind |
| HFIG | Holderness Fishing Industry Group |
| HPMA | Highly Protected Marine Area |
| INNS | Invasive non-native species |
| MCZ | Marine Conservation Zone |
| MMO | Marine Management Organisation |
| NFFO | National Federation of Fishermen's Organisations |
| PEIR | Preliminary Environmental Impact Report |
| SAC | Special Area of Conservation |
| SFF | Scottish Fishermen's Federation |
| SFPO | Swedish Fishermen's Producer Organisation |
| SPFPO | Swedish Pelagic Federation Producer Organisation |
| SWFPA | Scottish White Fish Producers Association |
| SWFPO | South West Fish Producer Organisation |
| VMS | Vessel Monitoring Systems |

13.1. Consultation Responses

13.1.1. Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the scoping report (2022), the Preliminary Environmental Information Report (PEIR) (2023) and Commercial Fisheries Working Group (CWFG) meetings, along with port visits, fisheries questionnaires and individual meetings with fishers.
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 13-1-1**.

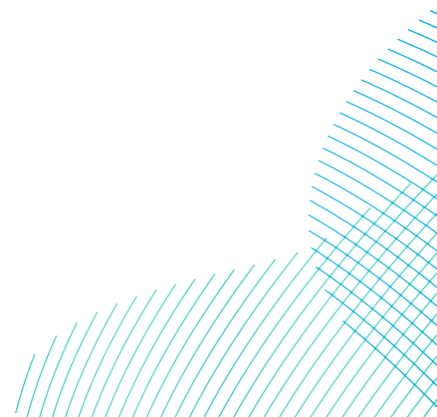


Table 13-1-1 Consultation Responses Related to **Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)**

| Comment | Project Response |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commercial Fisheries Working Group (CWFG) meeting – 30/03/2022 | |
| <p>Concerns regarding coexistence – located on the slopes of Dogger Bank, where there are important sandeel fishing grounds. Concerns regarding coexistence with the fisheries in the region, particularly the sandeel fishery. Noted that some fishing vessels would not fish within a wind farm array area.</p> | <p>The Projects have obtained spatial data from Danish and German fishers which show the location and spatial extent of sandeel fishing grounds in the North Sea, which indicates that there are discrete Danish sandeel fishing grounds within the Array Areas and offshore part of the Offshore Export Cable Corridor and four discrete area where German fishers target sandeels. This information is considered within Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the Existing Environment (section 13.5) and the Assessment of Significance (section 13.6) of the Environmental Statement (ES).</p> <p>The Applicants are taking and will continue to take steps to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. A Fisheries Liaison and Coexistence Plan (Volume 8, application ref: 8.28) is being developed by the Applicants through ongoing consultation with fisheries stakeholders.</p> |
| The Planning Inspectorate / 02 September 2022 / Scoping Opinion: Proposed Dogger Bank South Offshore Wind Farms Case Ref: EN010125 02/09/2022 | |
| <p>Increased steaming times to alternative fishing grounds for vessels that would otherwise fish in the Proposed Development area (operation): The Scoping Report states that the magnitude of this impact is deemed negligible as the effect will be temporary and localised.</p> <p>The Scoping Report does not explain why operational effects are anticipated to be temporary, however the Inspectorate agrees that due to the nature and the low sensitivity of fishing vessels taking account of their large operational range, a detailed assessment in the ES is not likely to be required. However, the ES should characterise the operational effects on commercial fisheries including increased steaming times and provide the evidence used to determine that significant effects are unlikely.</p> | <p>This impact is fully considered within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), whereby it is assumed that fishing will still be able to continue within the Offshore Development Area during the operational phase. Increased steaming times may occur due to localised exclusion from temporary restrictions due to maintenance and cable repair events. Such exclusions are considered to be very localised and temporary in nature. Embedded mitigations such as advanced warnings via Notice to Mariners and ongoing liaison will further reduce the impacts of increased steaming times. As such the magnitude of impact is deemed to be negligible.</p> |
| <p>Assumptions and limitations: The Scoping Report acknowledges assumptions and limitations with the quantitative data sets used to inform the Scoping Report and expected to inform the ES.</p> <p>Paragraph 373 notes that smaller vessels are excluded from the analysis of Vessel Monitoring System data which only captures vessels over 12m in length, and that datasets from 2020 and 2021 will be affected by COVID-19. It is proposed that in order to support these existing data sets, consultation will be held with fisheries stakeholders to provide further insight into specific fishing grounds and activity of vessels in the area.</p> | <p>Consultation has been held with fisheries stakeholders, as outlined within this table, to support the existing datasets. This has been ongoing throughout the Projects.</p> <p>Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which Vessel Monitoring System (VMS) data is likely to be under represented.</p> |
| <p>Assumptions and limitations: Data across a time period of at least 4 years prior to 2020 will be collated to avoid the impacts of Coronavirus (COVID-19).</p> | <p>Long-term datasets (10 years) prior to 2020 have been obtained where possible (section 13.4.2 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |

| Comment | Project Response |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Assumptions and limitations: The ES should clearly state the limitations associated with any data used. Efforts should be taken to agree the data sources with relevant consultation bodies and outcomes should be evidenced within the ES.</p> | <p>Limitations and assumptions of the dataset are acknowledged throughout this document and discussed in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2). Data sources were presented to fisheries stakeholders during CFWG meetings and discussed during port visits, as outlined within this table.</p> |
| <p>Invasive non-native species (INNS): The ES should assess the potential for the introduction of hard substrate and vessel movements to facilitate the spread of INNS (e.g. via ballast water, biofouling, introduction of artificial structures and through accidents and spillages), and the potential for impacts upon commercial fisheries where significant effects are likely to occur.</p> <p>Where significant effects are likely to occur, the ES should also consider the potential for climate change-related effects to facilitate the spread and exacerbate the impacts of INNS.</p> | <p>This impact is considered in Volume 7, Chapter 9 Benthic Habitats (application ref: 7.9); as no significant effects were predicted as a result of INNS, there would be no significant effects on commercial fisheries receptors. As such, this is not considered further within this chapter.</p> |
| <p>Andy Wheeler Consulting (Holderness Fisher Representative) – 23/11/2022</p> | |
| <p>Fishing activity – inshore static gear vessels active in the area 0 – 9nm. Targeting brown crab and lobster. Several vessels also targeting whelk. Targeting coarse gravelly seabed for lobster.</p> <p>Fishing activity is all year with highest activity through May – September, including within the offshore export cable corridor. Not aware of any longlining.</p> <p>Represents mostly 9 – 12m static gear vessels which fish 150 – 200 days per year; the majority use pots, with some using nets. Fishing is usually only over one day with typical steaming distances of 4 – 8nm.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on inshore static gear vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Static gear data – static gear activity represented in Marine Management Organisation (MMO) Vessel Monitoring Systems (VMS) data aligns with their understanding of general fishing patterns. Confirmed that they are not aware of any additional datasets.</p> | <p>This dataset is presented within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)); limitations and assumptions of the dataset are acknowledged throughout this document and discussed in detail Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2).</p> <p>Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which VMS data is likely to be under represented.</p> |
| <p>Future changes to fishing activity – increased fishing activity as a result of ‘Brexit’; Highly Protected Marine Area (HPMA) on the Holderness coast may result in fishers moving north into the offshore export cable corridor; bp carbon capture surveys to the east of DBS may also increase fishing pressure; management measures affecting fishing activity.</p> | <p>This information is considered within the Existing Environment (section 13.5.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the Assessment of Significance (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> <p>Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> |

| Comment | Project Response |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Potential interactions with the Project – main concerns related to the offshore export cable corridor (cable burial and rock protection).</p> | <p>Cables would be buried where possible to an indicative target depth of 0.5-1.5m; in areas where this is not achievable, the offshore cables would be protected. Where cable protection is required, the location of cable protection would be considered to ensure that the most appropriate type was used (as outlined in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Scour protection could diversify fishing within the array area, reducing pressure on stocks.</p> | <p>Impacts on fish and shellfish stocks are considered within Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10), which assesses impacts on fish stocks to be minor adverse during the construction phase and negligible during operation.</p> <p>In consideration of the above assessment, resulting impacts on commercial fisheries receptor groups are assessed to be minor adverse, which is not significant in EIA terms. This is detailed in section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Independent fisher (Bridlington static gear) – 23/11/2022</p> | |
| <p>Fishing activity – static gear activity represented in MMO Vessel Monitoring Systems (VMS) data aligns with their understanding of general fishing patterns. Increasing static gear activity within the DBS West array area since 2020. Static gear activity across the offshore export cable corridor occurs later in the year, partly to minimise interactions with the Danish and Dutch sandeel and herring fishery in the area. Static gear is generally laid in a north-east to south-west orientation inside 6nm, and an east to west orientation between 6 – 12nm; within the array areas gear is shot in all directions.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2); impacts on static gear vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>The only significant impacts to static gears are identified within the offshore export cable corridor for loss or restricted access to fishing grounds for inshore static fishers. Additional mitigations proposed in section 13.6.1.1.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), will reduce these moderate adverse effects to minor adverse, which is not significant in EIA terms.</p> <p>The Projects have obtained spatial data from Danish and German fishers which show the location and spatial extent of sandeel fishing grounds in the North Sea, which indicates that there are discrete Danish sandeel fishing grounds within the Array Areas and offshore part of the Offshore Export Cable Corridor and four discrete area where German fishers target sandeels.</p> |
| <p>Array layout – turbine spacing is not a major concern. Providing the turbines are in a line or pattern, this fisher will be able to continue fishing. Fishing within offshore wind farms is seen as an additional safety measure for their crew. Fished within Triton Knoll since construction.</p> | <p>This information is considered within the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)). Embedded mitigation measures discussed in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), such as aids to navigation, safety zones and development of a Fisheries Liaison and Co-existence Plan are proposed to mitigate impacts to commercial fishers within the array areas.</p> |
| <p>Dogger Bank Special Area of Conservation (SAC) Byelaw – mobile gear vessels have been displaced into other areas, with herring and sandeel now being targeted on the banks to the south of the DBS array areas. Positive for static gear due to lack of conflict with mobile gear vessels.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the impact assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> <p>The Projects have obtained spatial data from Danish and German fishers which show the location and spatial extent of sandeel fishing grounds in the North Sea, which indicates that there are discrete Danish sandeel fishing grounds within the DBS array areas and offshore part of the offshore export cable corridor and four discrete area where German fishers target sandeels.</p> |

| Comment | Project Response |
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| Holderness Fishing Industry Group (HFIG) - 24/11/2022 | |
| <p>Conclusions drawn from limited evidence – conclusions of the PEIR should acknowledge limited datasets.</p> | <p>Limitations and assumptions of the dataset are acknowledged throughout this document and discussed in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2).</p> <p>Additional spatial data has been provided from Danish and German sandeel fishers and site specific marine traffic and vessel scouting surveys have been undertaken to further inform VMS data.</p> |
| <p>Cumulative impacts – should consider effect on fish stocks and long term availability.</p> | <p>A Cumulative Effect Assessment has been undertaken as part of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>The approach to this is outlined in section 13.4.4 and the assessment of cumulative effects is detailed in section 13.8. As underwater noise from other developments within the region has the potential to overlap with impacts produced during construction associated with the Projects, potential impacts to commercially important fish and shellfish resources were screened into the cumulative effects assessment.</p> |
| <p>Fishing activity – represents 34 vessels (6 – 15m in length). Mostly static gear activity, with several fixed netters (beach and boat); not aware of any longlining. Targeting shellfish, e.g. crab and lobster; whelk is mainly landed as a bycatch. Fishing occurs all year around. Members are mainly based in Bridlington, but also across Hornsea, Withernsea, and Flamborough.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2); impacts on static gear vessels and intertidal netters are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Static gear data – static gear activity represented in MMO VMS data aligns with their understanding of general fishing patterns; noted that inshore fishing is likely to be under-represented.</p> | <p>This dataset is presented within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)); limitations and assumptions of the dataset are acknowledged throughout this document and discussed in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2).</p> <p>Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which VMS data is likely to be under represented.</p> |
| <p>Potential interactions with the Project – main concerns related to the offshore export cable corridor (cable burial and rock protection).</p> | <p>Offshore export cables would be buried where possible to a target depth of 0.5-1.5m; in areas where burial is not achievable, the cable would be protected, and cable protection would be designed to minimise snagging (as outlined in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Landings data – reduction in lobster landings by a third in 2018, due to a change in legislation which banned the landing of egg bearing females.</p> | <p>Noted. Long-term datasets (10 years) have been obtained where possible to account for changes to fishing activity (section 13.4.2 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |

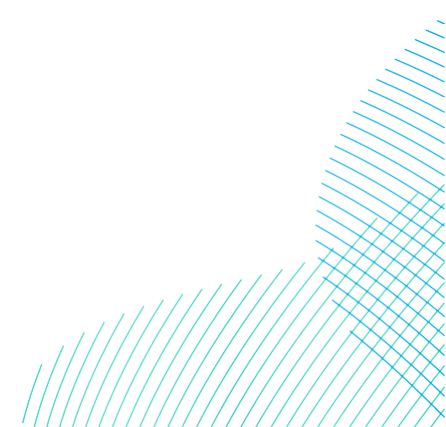
| Comment | Project Response |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Dogger Bank SAC Byelaw – mobile gear vessels have been displaced into other areas, notably closer inshore which has caused increase pressure, and could result in conflict between gear types. Static gear has shifted north from Grimsby. Larger static gear vessels (with up to 250 pots) from further afield have started fishing the Dogger Bank.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13))).</p> <p>Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> |
| <p>Independent fisher (intertidal netter) – 24/11/2022</p> | |
| <p>Fishing activity – Skipsea Lane End and Far Grange. Nets are 150 yards, with three anchors approximately every 12 yards. Fishing activity between October and August, with no fishing in September. Catches include sea trout during March to August and sea bass, sole, mullet, skate, and thornback ray all year.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on intertidal netters are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Independent fisher (Bridlington static gear) – 24/11/2022</p> | |
| <p>Fishing activity – target crab and lobster on patches of stone and hard clay, whereas whelk is targeted on soft, muddy grounds; male crabs are more abundant further offshore. Fishes all year, but September to December is most profitable.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on static gear vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Static gear data – static gear activity represented in MMO VMS data aligns with their understanding of general fishing patterns; but noted that there is also static gear further north, to the west of the DBS array areas.</p> | <p>This dataset is presented within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)); limitations and assumptions of the dataset are acknowledged throughout this document and discussed in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2).</p> |
| <p>Array layout – wider spacing of turbines is preferable. Fishes within operational sites (e.g. Triton Knoll), but not during inclement weather. Turbine spacing at Triton Knoll is considered the minimum safe to fish.</p> | <p>This information is considered within the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13))). Embedded mitigation measures discussed in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), such as aids to navigation, safety zones and development of a Fisheries Liaison and Co-existence Plan are proposed to mitigate impacts to commercial fishers within the array areas.</p> |
| <p>Potential interactions with the Project – construction vessels will need to work exclusively within closed fishing areas (including area for turning circles), otherwise risks gear snagging.</p> | <p>Noted. Loss or damage to fishing gear due to snagging is assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Dogger Bank SAC Byelaw – benefit to static gear fishers, as there is no longer potential for conflicts with mobile gear.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13))).</p> <p>Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> |

| Comment | Project Response |
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| <p>Swedish Pelagic Federation Producer Organisation (SPFPO) - 9/12/2022</p> | |
| <p>Fishing activity – targeting mainly herring, sprat, and sandeel (depending on quota). Sandeel season is generally from April to around late June. Herring are targeted following the completion of the sandeel fishery through to the end of the summer. Mackerel targeted in October, and anchovies targeted October to December.</p> <p>Vessels are generally between 41 – 64m in length.</p> <p>Sprat and herring fishery uses pelagic gear types; these fisheries follow fish movements and are unpredictable.</p> <p>The sandeel fishery uses bottom contacting gears and is very predictable, as follows the same tracks every year. Quota and allocations vary year to year, which affects fishing activity in the area.</p> <p>Pelagic (midwater trawls) target the 'Hills'¹ for sandeel and herring.</p> <p>Nets are approximately 1.5km in length and can weigh over 100 tonnes when full; maximum spread of netting is 180 – 200m.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>The Projects have obtained spatial data from Danish and German fishers which show the location and spatial extent of sandeel fishing grounds in the North Sea, which indicates that there are discrete Danish sandeel fishing grounds within the Array Areas and offshore part of the Offshore Export Cable Corridor and four discrete area where German fishers target sandeels.</p> |
| <p>Concerns on fish stocks – Concerns regarding impacts of Electromagnetic Fields (EMF) and underwater noise on fish stocks, particularly herring. Dogger Bank is an important area for juvenile and young herring; stakeholders highlighted concerns that the Project could cause reductions in the herring stock.</p> | <p>Impacts on fish and shellfish stocks are considered within Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10); resulting impacts on commercial fisheries receptor groups are considered in section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>Impacts of EMF and underwater noise have been assessed to be, at worst, or a minor adverse effect in the fish and shellfish chapter. These impacts have been considered within the commercial fisheries chapter and as such impacts to commercially important fish and shellfish resources are assessed to be of a minor adverse effect, which is not significant in EIA terms.</p> |
| <p>Concerns regarding competition for space – as a result of loss of habitats and fishing grounds.</p> | <p>Effects from loss or restricted access to fishing grounds; displacement from the wind farm site and offshore export cable leading to gear conflict and increased pressure on adjacent fishing grounds is considered within the assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> <p>Impacts to loss or restricted access to fishing grounds within the Offshore Export Cable Corridor are assessed to be of a moderate adverse effect for dredge and inshore static gears during the construction phase. With the application of additional mitigation measures these effects are reduce to a residual minor adverse effect, which is not significant in EIA terms.</p> <p>Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> |

¹ The Hills is an area south-west of the DBS array areas, which can be seen on Figure 13-1; the offshore export cable corridor overlaps with the northern parts of the Hills.

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| <p>Array layout – providing there is 1.5nm (2.8km) spacing of turbines and a regular pattern i.e. turbines are in straight lines, pelagic fishing may continue within windfarm arrays. However, some fishers will not fish within wind farm arrays. Layout of turbines in straight lines will increase potential for co-existence. As the sandeel fishing grounds are well established, co-existence could be achieved by avoiding placing turbines on sandeel grounds.</p> | <p>This information is considered within the main assessment (section 13.6).</p> <p>The Projects have obtained spatial data from Danish and German fishers which show the location and spatial extent of sandeel fishing grounds in the North Sea, which indicates that there are discrete Danish sandeel fishing grounds within the Array Areas and offshore part of the Offshore Export Cable Corridor and four discrete area where German fishers target sandeels.</p> <p>Embedded mitigation measures discussed in section 13.3.3, such as aids to navigation, safety zones and development of a Fisheries Liaison and Co-existence Plan are proposed to mitigate impacts to commercial fishers within the array areas.</p> |
| <p>Lack of data for pelagic fish – assessments are limited by the lack of information on pelagic fish.</p> | <p>The Projects have followed up with fisheries stakeholders to identify whether there are any further datasets that could be obtained. Limitations and assumptions of the data (or lack of) are acknowledged throughout this document and discussed in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2).</p> <p>Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which Vessel Monitoring System (VMS) data is likely to be under represented.</p> |
| <p>Dogger Bank SAC Byelaw – sandeel fishery is now prohibited from the area.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13))).</p> |
| <p>Le Comité national des pêches maritimes et des élevages marins (CNPMEM) (Normandie and Boulogne) – 13/12/2022</p> | |
| <p>Fishing activity – principal fishing grounds for French fishers (operating out of Boulogne-sur-Mer) are located from Flamborough Head to Hornsea and Grimsby, with Silver Pit one of the key grounds.</p> <p>Overlap of fishing activity with the offshore export cable corridor, but not with the array areas.</p> <p>Main activity for Boulogne-sur-Mer vessels is demersal otter trawling, with vessels ranging in size from 19 – 24m; vessels may also use semi-pelagic trawls to catch both mackerel and whiting.</p> <p>French pelagic vessels also targeting herring on the ‘Hills’.</p> <p>Whiting season is generally between April and June.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Dogger Bank SAC Byelaw – vessels are no longer able to fish within this area.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13))).</p> |

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| <p>Future fishing activity – considerable uncertainty regarding future access to UK waters for French fishers.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Rederscentrale - 14/12/2022</p> | |
| <p>Fishing activity – most members are beam trawlers, but some use otter trawls in the region. Principal species are Dover sole and plaice, with bycatch of turbot and brill. Also catch blonde ray, spotted ray and thornback ray. Overlap of fishing activity with the offshore export cable corridor.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Potential interactions with the Project – main concerns related to the offshore export cable corridor (cable burial and rock protection).</p> | <p>Offshore export cables have been buried where possible to a target depth of 0.5-1.5m; in areas where this was not achievable, the cable was protected, and the location of any cable protection required was considered to minimise snagging as far as possible (as outlined in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Dogger Bank SAC Byelaw – vessels are no longer able to fish within this area.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>CFWG meeting - 06/01/2023</p> | |
| <p>Dogger Bank SAC Byelaw – noted that this has affected fishing activity in the area.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Marine traffic surveys – comment that the time of year may affect which fishing vessels are active in the area.</p> | <p>Limitations and assumptions of datasets are acknowledged and outlined in Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2). Marine traffic surveys are undertaken predominantly to inform the Volume 7, Chapter 14 Shipping and Navigation (application ref: 7.14); and are repeated during summer and winter months in accordance with MCA guidance; site-specific scouting (potting) surveys and guard vessels observations have also been undertaken to inform the Existing Environment (section 13.5 Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)); these have been used to supplement official datasets.</p> |



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| <p>Location of potential offshore platforms along the export cable corridor – query whether an opportunity will arise for fisheries stakeholders to discuss the area identified for the location in relation to fishing grounds.</p> | <p>The Projects have followed up with fisheries stakeholders to discuss the potential locations and conducted a risk assessment which identified a 20km stretch of the offshore export cable corridor suitable for potential platform locations, where up to a maximum of four offshore platforms may be located within the export cable corridor or array area for the construction of DBS East and DBS West in-isolation. This has been shared with the CFWG and has been refined throughout the PEIR and ES process in accordance with comments received.</p> |
| <p>Guard vessels – query by a German fishing industry representative asking whether there would be any opportunities for fishing vessels to provide guard vessel services.</p> | <p>This has been considered within the Projects design envelope and worst case scenario (section 13.3.2 and 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)), and also the Assessment of Significance (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)). Provision of guard vessels where necessary was committed to in the Fisheries Liaison and Coexistence Plan where appropriate (Volume 8, application ref: 8.28).</p> |
| <p>SWFPA – 11/01/2023</p> | |
| <p>Fishing activity – vessels using scallop dredges (Newhaven style) to target king scallop outside of the 12nm limit. These vessels only fish for king scallop all year round.</p> <p>Within the Commercial Fisheries Study Area, dredging for scallops is mostly focused east of Flamborough Head, outside the 12nm, which overlaps with the offshore export cable corridor.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Penetration depth of gear – approximately 6 – 8 inches, but noting that in areas which are towed repeatedly the penetration depth will become deeper.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Width of towed gear – Eighteen Newhaven style scallop dredges per side. Each tow bar is approximately 18m in length.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)); impacts on these vessels are assessed within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>Potential interactions with the Project – main concerns related to the offshore export cable corridor (cable burial).</p> | <p>Export cables have been buried where possible to a target depth of 0.5-1.5m; in areas where this was not achievable, the cable was protected, and cable protection was designed to minimise snagging (as outlined in section 13.3.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>Dogger Bank SAC Byelaw – vessels are not able to fish within this area. Observed that other fishing vessels have been displaced to the English Channel, north-east Scotland and east of Flamborough Head outside of the 12nm.</p> | <p>This information is considered within the Existing Environment (section 13.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and Volume 7, Appendix 13-2 Commercial Fisheries Technical Report (application ref: 7.13.13.2)) and the main assessment (section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13)).</p> |
| <p>CWFG meeting 11/07/2023</p> | |

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| <p>Queries were raised regarding cable burial by the Scottish Fishermen’s Federation.</p> | <p>The Applicants have committed to the development of a cable burial plan, to outline target cable burial depth, cable protection and monitoring of cables. The cable burial plan would be secured through a condition in the marine licence. Potential loss or damage to fishing gear due to snagging during operation has been assessed within the ES for the dredge fleet receptor group separately, within section 13.6.2.4 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>In respect of the EIA fishers highlighted they would like to see the rationale behind the assessment and that other projects and developments and assessment of BREXIT should also be included.</p> | <p>The assessment methodology for commercial fisheries is set out in section 13.4.3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and follows that detailed in Volume 7, Chapter 6 EIA Methodology (application Ref: 7.6). Furthermore, cumulative effects have also been assessed within section 13.8 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>Future trends are discussed within section 13.5.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) of the ES and in detail within Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1). It is expected that the UK will receive higher fishing quotas as result of the new EU UK Trade and Cooperation Agreement. However, as a large proportion of the species landed within the Commercial Fisheries Study Area are non-quota shellfish species, they will not be affected by this agreement and no change is expected within the impact assessment.</p> |
| <p>Concerns were raised that pelagic trawling for sandeels would be unable to resume within the wind farm array and general targeting of snadeel species since the introduction of the Dogger Bank SAC.</p> | <p>Impacts of loss and restricted access and displacement to pelagic trawling receptor groups have been assessed to be, at worst, minor adverse during the, operation of the DBS East and DBS West Array Areas. This is discussed in full within section 13.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>Future trends are discussed within section 13.5.6 of the ES and in detail within Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1). Most notably the introduction of the Dogger Bank SAC byelaw is discussed within this section and several scenarios are considered within the impact assessment: firstly, the Dogger Bank SAC byelaw is in place which prohibits bottom towed gear within the entire SAC; secondly, a scenario where the Dogger Bank SAC byelaw is revoked and bottom fishing activity is permitted again within the boundary of the SAC; and thirdly for the Offshore Export Cable Corridor (where the only overlap with the Dogger Bank SAC byelaw is the easternmost option of the DBS East and DBS West Export Cable Routes).</p> |
| <p>PEIR Consultation, National Federation of Fishermen’s Organisation 17/07/2023</p> | |
| <p>The proposed Dogger Bank South wind farm and export cable sites support a diverse and economically important fishing fleet. This is well characterised within the PEIR. We welcome also the inclusion of fisheries-based data within the PEIR and the commitment to the development of a Fisheries Liaison and Co-Existence Plan; We would like to see the latter developed with all fisheries stakeholders in the region. The PEIR addresses data limitations and presents the fisheries baseline well within this context.</p> | <p>These comments are noted. An Outline FLCP has been submitted as part of the application process (Volume 8, application ref: 8.28). Responses on the outline plan have been requested from commercial fisheries stakeholders in consultation with the CFWG and those identified in the fisheries baseline study. Assumptions and limitations of the assessment are presented in section 13.4.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |

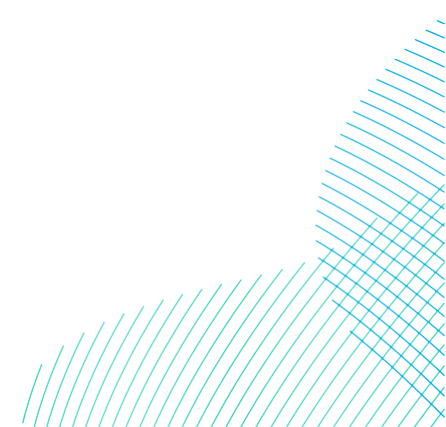
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| <p>The assessment of potential impacts makes several assumptions and conclusions that we disagree with when reviewing the data presented and feedback from our members in the region, however.</p> | <p>Noted</p> |
| <p>Section 13.6.1 assesses impacts to the receptors and assigns a level of significance in EIA terms. It is this assessment that is of concern. An economic loss to a receptor of 5-20% is assessed as being a low impact and 20-50% as a medium impact. An economic loss of up to 50% would result in business failure of any fisheries business. This must surely be a high impact. This would need a far greater level of mitigation than what is proposed within the PEIR. The proposed mitigation (embedded and additional) would not be acceptable in the context of up to a 50% loss of earnings.</p> | <p>In response to consultation with the CFWG, the low magnitude of impact definition has been updated within Table 13-11 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. Estimated percentage reduction in annual value of landings valuations are informed by expert judgement that is based on data analysis, stakeholder feedback, the array layouts presented and how these may affect fishing activity.</p> <p>Effects of moderate adverse significance are predicted for the inshore static gear vessels and dredge vessels during construction and decommissioning for loss or restricted access to fishing grounds within the Offshore Export Cable Corridor. Additional mitigation includes cooperation agreements and associated disruption payments in accordance with FLOWW guidance. If successfully implemented, these measures would reduce the significance of effect to minor adverse which is not significant in EIA terms.</p> <p>These impacts are presented within section 13.6.1.1.4 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and additional mitigation measures are detailed within section 13.6.1.1.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>The proposed mitigation measure of developing co-existence methods with those receptors most affected may actually not be possible. For example: the inshore dredge sector has been assessed as medium sensitivity, however the target burial depth of cabling is 0.5-1.0 m, which is very shallow and may deter the dredge fleet from fishing in the region during the operational phase, resulting in exclusion and a lack of co-existence. We would expect to see the potential economic losses to fishing businesses assessed in relation to their resilience to the predicted economic losses occasioned by the development.</p> | <p>The dredge penetration depth of 20cm has been reported through Project-specific stakeholder engagement, cables have been buried at a minimum depth of 0.5m is not expected to deter the scallop dredge fleet from such sites. A minimum burial depth of 0.5m for cables is standard across all OWF projects in the UK.</p> <p>The Applicants have committed to the development of a cable burial plan, to outline target cable burial depth, cable protection and monitoring of cables. The cable burial plan would be secured through a condition in the marine licence. Potential loss or damage to fishing gear due to snagging during operation has been assessed within the ES for the dredge fleet receptor group separately, within section 13.6.2.4 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>In response to consultation with the CFWG, the low magnitude of impact definition has been updated in the ES, to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. As such, potential economic losses to commercial fisheries have been assessed accorded to these revised definitions.</p> |
| <p>Table 13-3: it is unclear what is meant by best practice with regards to fisheries liaison. We would expect to see the most recent FLOWW guideline referred to here, for greater clarity, for example.</p> | <p>The most recently available FLOWW best practise guidance with regards to fisheries liaison has been adhered to with the ES. Updated FLOWW best practise guidelines are expected to be released in 2024, which would be reviewed and adhered to throughout the Project's lifetime where possible. Table 13-3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) has been updated to include a cross-reference to the FLOWW best practice guidelines.</p> <p>An Outline FLCP has been submitted as part of the application process (Volume 8, application ref: 8.28). Responses on the outline plan have been requested from commercial fisheries stakeholders in consultation with the CFWG and those identified in the fisheries baseline study.</p> |

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| <p>We disagree with the assessment of displacement effects. Commercial fisheries in the region, both UK and EU fleets, are already subject to extensive spatial restrictions. The displacement effects of this development and others within the Dogger Bank region will have a continued effect on all commercial fisheries and this needs to be assessed correctly.</p> | <p>Displacement effects have been discussed further in commercial fisheries working group meetings. Displacement effects have been assessed in section 13.8 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13). Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> |
| <p>The Hornsea Four development should be scoped into the cumulative assessment, as fishers are already seeing both developments operating in the same spatial regions, specifically the export cable route.</p> | <p>Noted, potential cumulative effects with Hornsea Project Four, a Tier 3 project, have been considered in section 13.8 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>It is welcome that the potential for benefit to fishing businesses of supply chain opportunities is assessed. There must be some scepticism here, however, as such benefits are not currently being delivered through the pre-construction surveys for this project. Non-local vessels, with foreign crew, are acting as guard and chase vessels and these have difficulty disseminating information at sea, inhibiting rapid and safe resolution of issues. As this is proposed as a potential mitigation measure, we would expect to see the practice of using non-local vessels replaced with ensuring only guard vessels and FLOs with local expertise are employed.</p> | <p>The Projects acknowledge the benefits of using local vessels and crews to deliver safe and effective activities. It should be noted it is the Projects primary choice to use local vessels and crew, it is also highlighted all guard vessels deployed to date on the Projects had a crew of UK nationals (English or Scottish), with at least one local crew member at all times. Supply chain opportunities for local fishing vessels are assessed in sections 13.6.1.5 and 13.6.2.5 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13). Minor beneficial impacts are assessed for demersal seine, dredge, otter trawl, pelagic trawl and offshore static gear vessels across all phases of the Projects.</p> |
| <p>The commercial fisheries in the region can expect to see a vastly changing landscape through the lifespan of the Dogger Bank South project. The spatial squeeze on fisheries due to offshore developments in the region is already extensive and the likelihood of further restrictions with regards to the current ban on all mobile gear within the SAC and potential bans on mobile gear within MCZs also envisaged. Factors associated with the renegotiation of the Trade and Cooperation Agreement and consequent changes in access arrangements for EU vessels will also affect commercial fishing opportunities in the region. Whilst these elements are acknowledged in the PEIR as possible factors, they are not accounted for in the impact assessments.</p> | <p>Future trends are discussed within section 13.5.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) and in detail within Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1). Most notably the introduction of the Dogger Bank SAC byelaw is discussed within this section and several scenarios are considered within the impact assessment: firstly, the Dogger Bank SAC byelaw is in place which prohibits bottom towed gear within the entire SAC; secondly, a scenario where the Dogger Bank SAC byelaw is revoked and bottom fishing activity is permitted again within the boundary of the SAC; and thirdly for the Offshore Export Cable Corridor (where the only overlap with the Dogger Bank SAC byelaw is the easternmost option of the DBS East and DBS West Export Cable Routes). It is expected that the UK will receive higher fishing quotas as result of the new EU UK Trade and Cooperation Agreement. However, as a large proportion of the species landed within the Commercial Fisheries Study Area are non-quota shellfish species, they will not be affected by this agreement and no change is expected within the impact assessment. Further investigation into the quota uplift from leaving the Common Fisheries Policy is assessed in Volume 7, Appendix 13-2 (application ref: 7.13.13.2). Spatial squeeze on fisheries due to offshore developments in the North Sea, including the possibility of further restrictions with regards to the potential ban on all mobile gear within MCZs, have been assessed as part of the cumulative effects assessment, within section 13.8 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |

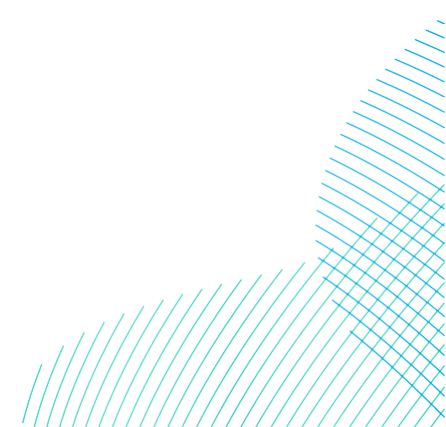
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| <p>It is recognised that the PEIR characterises a commercial fisheries baseline by analysing many different data sources to describe and analyse the commercial fisheries impact, including stakeholder expertise. The limitations of the data are well understood and described. The assumptions made, and subsequent impacts assessed from these data, do not align with the level of economic impact assessed, however, and we do not agree with them.</p> | <p>In response to consultation with the CFWG, and in recognition of the limitations of the available data, the low magnitude of impact definition has been updated in Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), to cover a potential loss of revenue of between 5-10%, while the medium magnitude of impact definition now covers a potential loss of revenue of between 11-50%. As such, potential economic losses to commercial fisheries have been assessed according to these revised definitions.</p> |
| <p>In fisheries management, a precautionary principle is enacted where there is a paucity of relevant data or significant uncertainties. This does not seem to be the case for impact assessments. Limitations of data are acknowledged but do not seem to influence the outcomes of impact assessments: a flaw in the methodological design and interpretation.</p> | <p>Section 13.4.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) outlines the limitations in detail and also states that where there may be limitations in data, findings have been supplemented by project-specific consultation feedback from commercial fisheries stakeholders. Data sources were presented to fisheries stakeholders during the CFWG meetings, and discussed during port visits. For example, with regard to the MMO VMS data, it was concluded that official data sources generally align with fisheries stakeholders understanding of fishing patterns, but it was noted and agreed that inshore fishing is likely to be under-represented by these data. For the inshore fleets and pelagic trawl fleets, site specific marine traffic and scouting surveys have been used to inform the existing environment and support official data sources, using an accepted approach similar to that of other offshore wind farm applications.</p> <p>The magnitude of impact definitions have purposely used a range, i.e. between 5-10% of potential loss of revenue, as it is recognised that the estimates are based on data with various limitations and assumptions (which are outlined in the Volume 7, Appendix 13-1 Commercial Fisheries Technical Report (application ref: 7.13.13.1)).</p> |
| <p>Whilst we appreciate the difficulties in assessing impacts with limited data sources, we feel that the effects of this needs to be fully accounted for in the methodology. This development will have a direct impact on commercial fisheries and their communities, and we feel the PEIR under-represent these.</p> | <p>Response to the above comment also applies here. In addition to the above, we have recently received additional VMS data from various organisations that are active within the commercial fisheries study area. Site specific marine traffic and scouting surveys have also been undertaken to further inform the existing environment for the inshore fleets and pelagic trawl fleets, for which VMS data is likely to be underrepresented. This has been incorporated into Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>PEIR Consultation, Sweden Pelagic Federation Producer Organisation 17/07/2023</p> | |
| <p>“Windmill farms may result in e.g. continuous low frequency underwater noise during the windmill park lifetime, increased turbidity during construction, changed current patterns, and electromagnetic fields around cables. Crab and lobster larvae have been demonstrated to risk impaired swimming capabilities from electromagnetic fields, and there are indications that pelagic species may avoid wind parks. The present knowledge about these factors and their effect on the underwater fauna is severely lacking. SPF members are concerned that these and other impacts from windmill farms may negatively impact some fish species. Risk for effects on fish behaviour, migration patterns and fish reproduction etc. cannot be ruled out.”</p> | <p>Please refer to Volume 7, Chapter 10 Fish and Shellfish (application ref: 7.10) for further details on this topic.</p> <p>Impacts of EMF and underwater noise have been assessed to be, at worst, or a minor adverse effect in the fish and shellfish chapter. These impacts have been considered within the commercial fisheries chapter and as such impacts to commercially important fish and shellfish resources are assessed to be of a minor adverse effect, which is not significant in EIA terms.</p> |

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| <p>In the southern Baltic, there has been an extensive expansion of windmill farms. At the same time, the migration patterns and behaviour of the southern/western Baltic spring-spawning herring seem to have changed, and the recruitment of this stock is presently at historically low levels. ICES has since several years given a zero advice for fishing on the stock and severe fishing restrictions are in place. Even though there are no proof that the reproduction has been impaired directly through the windmill farms, this is the connection that many of our members do, and they are concerned that windmill farms in other areas may likewise negatively impact pelagic fish recruitment.</p> | <p>No additional monitoring requirements are proposed for fish and shellfish receptors when the embedded mitigation measures are considered. Please refer to section 10.8 of Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10).</p> |
| <p>SPF is of the opinion that using the precautionary principle, studies on factors such as these on a wide range of fish and crustacean species need to be carried out before any decision can be made on allowing offshore windmill parks. If wind parks are approved and built, we are of the strong opinion that long-term studies on the fish community must be conducted in and around the park to further the knowledge on effects from wind parks on different fish and crustacean species.</p> | <p>Existing UK legislation does not prohibit commercial fishing within operational offshore wind farms, and for some sites that have fixed foundation options, commercial fishing has continued during this phase. Please refer to Paragraph 245 of the commercial fisheries ES chapter where examples of where fishing has continued successfully are described in detail. It should also be noted that the commercial fisheries impact assessment has been completed in line with most recent and up to date guidance and legislation.</p> <p>No specific monitoring requirements are deemed necessary for fish and shellfish, due to the long-term use of the Dogger Bank as a commercial fishing ground and associated long-term data sources relating to fish and shellfish as a result of this.</p> <p>Please refer to Volume 7, Chapter 10 Fish and Shellfish Ecology (application ref: 7.10) for further details on this topic.</p> |
| <p>Large areas on the Dogger Bank are now restricted for fishing practices. This negatively affects our members and other fishermen, who have fished in these areas for generations. Pelagic fishing with midwater trawls or purse seines is a practice that needs large areas, and the towed gear can be well over a kilometre long. Currently, we are not aware of any wind park where fishing with active gear is allowed or practically feasible. Therefore, windmill farms have replaced the historical fishery in many areas. Cumulative effects on fisheries in a larger regional context should be considered, and fishermen compensated by the windmill companies both for the loss of fishing waters and fishing opportunities.</p> | <p>Existing UK legislation does not prohibit commercial fishing within operational offshore wind farms, and for some sites that have fixed foundation options, commercial fishing has continued during this phase. Please refer to Paragraph 245 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) where examples of where fishing has continued successfully are described in detail.</p> <p>Existing and future fisheries exclusions due to regulation are discussed within the existing environment and future trends in sections 13.5 and 13.5.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13), respectively. Furthermore, potential cumulative effects as a result of other plans and projects and fisheries exclusions, such as the Dogger Bank SAC, are considered and assessed within section 13.8 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>PEIR Consultation, Marine Management Organisation 17/07/2023</p> | |
| <p>The MMO recommends early engagement with National Federation of Fishermen's Organisations (NFFO) and local harbour authorities and fishermen is encouraged, including the early engagement with a Fisheries Liaison Officer.</p> <p>The MMO will maintain a watching brief on anything that may fall within the MMO's remit – such as DML conditions.</p> | <p>Close engagement has continued with Commercial Fisheries stakeholders in order to discuss key issues. Meetings were undertaken in January, July and November 2023, and a separate meeting was held with the NFFO in December 2023, to provide the latest project updates and to discuss outcomes of the PEIR (see Volume 5, Consultation Report application ref: 5.1) for further information.</p> |

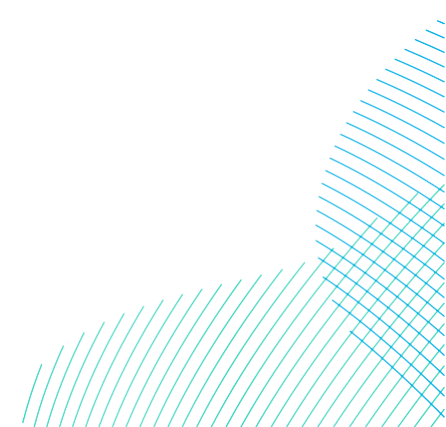
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| <p>PEIR Consultation, Dutch Reaction - Netherlands, with inputs provided by the Dutch Ministry of Infrastructure and Water Management, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Agriculture, Nature and Food Quality (15/09/2023)</p> | |
| <p>2. Other activities</p> <p>In our analysis of the transboundary effect of the Dogger Bank South Offshore Wind Farms we considered various activities such as international shipping, protection of marine protected areas, cables and pipelines, other offshore wind projects and commercial fishing. From this analysis, only commercial fishing expects effects on their activities.</p> <p>The PEIR acknowledges that Dutch vessels are present in the area and record catches. Mitigation measures such as opportunities for co-use functions are discussed, which the Netherlands would appreciate. The area consists of important fishing grounds for various demersal and pelagic fisheries that use beam trawls and seine netting (demersal) and midwater otter trawls (pelagic). Chapter 14 already analyses the expected short- and long-term impact for different fisheries on access to the fishing grounds.</p> <p>The Netherlands would like to request that the analysis also looks at the economic value of the fisheries and accounts for possible economic losses that may occur due to lack of or lesser access to important fishing grounds. It is important to note that whilst the Dutch do not have historic rights in the given area, the Netherlands does have a share in the quota in these waters, for instance plaice (PLE/2A3AX4) and horse herring (HER/1/2-). The construction of the park poses the risk that fisheries may fail to take advantage of fishing their share of quota due to the construction in these specific areas. This is not yet considered in the PEIR as a risk. Therefore the Netherlands would be interested to learn more what the United Kingdom's government or wind farm operators can and will do to further mitigate potential losses and facilitate commercial fisheries in the area.</p> | <p>Given the prevalence of non-UK registered fishing vessels within the Commercial Fisheries Study Area, impacts that might arise on the interests of EEA states within UK waters, e.g. Dutch fishing vessels, have been considered throughout assessments on the commercial fisheries sector in Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |
| <p>CFWG meeting - 22/11/2023</p> | |
| <p>Attended by a representative of the Norwegian Fishermen's Association and Dutch bottom trawling fleet (VisNed). No major queries or concerns were raised in response to Project updates, survey activities or approach to the assessment.</p> | <p>This is acknowledged.</p> |
| <p>National Federation of Fishermen's Organisation meeting - 11/12/2023</p> | |



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| <p>Concerns were raised regarding the continuation of fishing during the operational lifetime of the Project. A commitment to cable curial of 0.5m was noted as not being sufficient as cables will periodically become exposed due to mobile sediments. This raises particular economic concerns for the scallop sector.</p> | <p>The Applicants have committed to a burial depth of between 0.5 and 1.5m with respect to non-mobile seafloor level. Alongside this the Applicants would produce a cable burial plan, to outline target cable burial depth, cable protection and monitoring of cables. The cable burial plan would be secured through a condition in the Deemed Marine licence (DML). Potential loss or damage to fishing gear due to snagging during operation has been assessed within Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) for the dredge fleet receptor group separately, within section 13.2.6.4.</p> <p>A Cable Statement (Volume 8, application ref: 8.20) which includes Cable Burial Risk Assessments for the export cable and array area cables has been submitted for the Projects alongside this ES.</p> |
| <p>Displacement effects should be considered on a case by case basis and displacement effects have increased as a result of the Dogger Bank Special Area of Conservation byelaw and other Marine Conservation Zones</p> | <p>Effects from displacement from the wind farm site and offshore export cable leading to gear conflict and increased pressure on adjacent fishing grounds is considered within the assessment (section 13.6) and cumulative effects assessment (section 13.8) of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> <p>Impacts of displacement leading to increased gear conflict and pressure on adjacent fishing grounds are assessed to be, at worst, of a minor adverse effect which is not significant in EIA terms.</p> <p>Cumulative impacts of displacement are assessed to be of a moderate adverse effect for the dredge receptor group, which is significant in EIA terms. Additional mitigations, such as encouragement of co-existence, disruption payments in accordance with FLOWW guidance and cooperation agreements, has been included within the Outline Fisheries Liaison and Coexistence Plan, which is included as an embedded mitigation measure and is submitted as part of the DCO application (Volume 8, application ref: 8.28).</p> |
| <p>I note that there has been a high degree of local stakeholder input, I like the fact that local fishermen have been asked to demonstrate their key grounds i.e., show on charts and images of plotters etc. This fits well with us as it demonstrates attention to detail.</p> | <p>This is acknowledged. Consultation undertaken in relation to commercial fisheries is detailed within Volume 7, Appendix 13-1 Commercial Fisheries Consultation Appendix (application ref: 7.13.13.1) and Volume 5, Consultation Report (application ref: 7.5).</p> |
| <p>The data limitations are widely recognised, but nevertheless the same outcomes always appear, it often seems that the precautionary principle is not so prevalent in the assessment.</p> <p>Unfortunately, we don't hold such economic data, some of our members may have data, however, the type of economic data you require is more likely to be held by non-members of the NFFO. You may want to investigate data produced/held by Seafish, although it is fairly generic, and not so specific to your particular needs.</p> | <p>Data sources and site-specific surveys used to inform the assessment are outlined in section 13.4.2 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13). Economic data specifically has been obtained from the MMO and ICES and analyses in detail within Volume 7, Appendix 13-2 Commercial Fisheries Technical Appendix (application ref: 7.13.13.2).</p> <p>Additionally, data limitations are also recognised and highlighted in section 13.4.6 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13).</p> |



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| <p>[In relation to FLOWW]</p> <p>The representative of the NFFO noted it was reassuring that DBS have committed to going above and beyond sourcing the most up to date data and guidance and are committed to using these most up to date versions instead of relying on aged publications. This is recognised in the inclusion of additional data within the Environmental Statement and willingness to include updates to the Fisheries Liaison and Co-existence Plan (FLP/CeP) in relation to the latest FLOWW guidelines, once published.</p> | <p>The Applicants acknowledge the benefits of using the most up to date guidance and data sources. In relation to this, updated FLOWW best practice guidelines are expected to be released in 2024, which has been reviewed and adhered to throughout the Project's lifetime where possible. Table 13-3 of Volume 7, Chapter 13 Commercial Fisheries (application ref: 7.13) has been updated to include a cross-reference to the FLOWW best practice guidelines.</p> |



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