



To whom it may concern,

This written representation forms the response from the NFFO to key documentation of concern to the fishing industry that forms part of the examination of the Dogger Bank South offshore wind development.

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) represents over 200 commercial fishing businesses in Wales.

Commercial fisheries have existed in the proposed region for generations and are already faced with extensive spatial restrictions such as existing and proposed offshore wind developments, Marine Protected Areas and legislative restrictions in the region. The area is economically important to fishing fleets from all the devolved UK administrations, with a variety of gear type being deployed, both static and mobile. Further displacement of commercial fishing in the region will result in economic harm, through loss of earnings from the ground and additional operating costs due to increased steaming times during construction and operation of the project.

The response below has been separated to specific concerns we have with regards the draft Fisheries Liaison and Co-existence Plan (FLCP) and the outline Cable Statement. It is acknowledged that the applicant has engaged with the NFFO on the draft FLCP prior to Deadline 1, however due to the NFFO liaising across all wind farm developments currently under examination it has not been possible to submit comments to the applicant prior to Deadline 1. These comments are in addition to concerns raised by the NFFO at the pre-examination and Relevant Representation submissions.

Fisheries Liaison and Coexistence plan

The comments below are specific to the Fisheries Liaison and Coexistence Plan, we reviewed the document submitted to the inspectorate dated 26th November 2024.

The applicant has taken a portfolio approach to the FLCP for consistency across all the applicants developments A portfolio approach can be seen as efficient and create standardised liaison practices. However, it needs to be noted that regional variations in fisheries engagement and organisation need to be accounted for and understood.

1.3. Paragraph 9. We advise that ESCA is currently developing new guidelines for cables and fisheries interactions (linear cables only), expected in 2025. It is recommended to include reference to including these guidelines when they become available for future revisions of the FLCP.

The Dogger Bank South projects propose two separate companies to act in the capacity of Fisheries Liaison Officers (Precision Marine Survey Limited) and Commercial Fisheries Advisor (MacAlister Elliott & Partners). Both of which have defined roles within the FLCP. Ordinarily we would only expect to see a single company responsible for the roles covered by both companies here. We do not question the right of the applicant to approach these roles differently to what is normal, however we wish to ensure that commercial fisheries are correctly informed of who has what responsibility to ensure any issues that arise are dealt with accordingly. Commercial fisheries in the region are liaising across multiple projects and several different FLO companies, a simplistic and transparent approach is recommended.

Paragraph 23. NEIFCA is not a stakeholder, they are a government agency. We support their inclusion in the CFWG, but they should not be referred to as a stakeholder.

Section 3.3. We would expect to see a commitment to use local expertise wherever possible when employing fisheries support vessels. This is a form of mitigation for those impacted and also local expertise can help deconflict issues quickly and efficiently as they arise. We acknowledge that suitable vessels are not always

available, so the term “wherever possible” or “where available” allows for the inclusion but also acknowledges the challenges associated with securing local expertise and vessels.

Paragraph 36 (final bullet point). It is unclear what is meant by “piercing Project infrastructure and or vessels....”. We require clarity on this point.

We welcome the two-weeks minimum notice period for works described in Table 3-2. We would recommend including here that there are occasions where two-weeks' notice is not possible – urgent or emergency works for example.

Paragraph 39. Please note the NFFO does not disseminate notices to our members.

Paragraph 42. Please see above point for Section 3.3.

Paragraph 42. The applicant commits to “appropriate communication” with the fishing industry in the event of a cable becoming exposed in the operational phase. We would expect to see reference to the mitigation strategy the applicant will put in place if this were to happen, reference to the cable burial risk assessment and appropriate remediation strategies.

Paragraph 46, Table 4-1. Is this statement correct. Were commercial fisheries the governing factor that caused a refinement in the project area. We suspect not, if it was for other factors such as shipping and navigation this should be stated. Whilst there is a benefit to project area refinement to commercial fisheries, this is likely a secondary or tertiary benefit. A transparent and honest approach is needed to facilitate coexistence between the industries.

Cable Statement

The outline cable statement is lacking in detail on how the risk associated with cables and fishing will be assessed, conclusions drawn and mitigation strategies. All this document states are how the applicant plans to install the associated cables with minimal reference to mitigation or remediation concerns. Our comments are limited due to this lack of detail.

Fisheries concerns do not form part of any decisions on to cable routing requirements for this development. It must be acknowledged that the “avoid” component of marine spatial planning has not been applied here.

The comments submitted above are specific to the key documentation the NFFO reviews for commercial fisheries. We are also committed to further development of the SoCG and support the work of the Commercial Fisheries Working Group.



Mike Roach

Deputy Chief Executive Officer

On behalf of the;

National Federation of Fishermen’s Organisations