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Interested Party Reference number: 20047994
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1. Summary

WCSP Ltd have been catching and processing Queen Scallops (also King Scallops) in the eastern Irish Sea since 1971, currently employing over 100 people at our processing site and 30 fishermen who rely on the health of the Queen Scallop fishery. We **object** to the proposal as its area overlaps the most important Queen Scallop beds of the fishery; and current proposal measures do not go far enough to respect this important fishery. The fishery is one of 4 global Queen Scallop commercial fisheries, therefore Mona OWF raises significant socioeconomic and market implications. There are also no mitigation measures proposed to financially compensate Queen Scallop operators for any unforeseen consequences such as short or long-term habitat loss. We consider that the proposal in its current state presents a possible **Moderate or Major** (leaning towards major) impact.

This document initially assesses the proposal in relation to our vessels' 2023 fishing activity for Queen Scallops and we conclude that over 50% of the fishery will be situated within OWF infrastructure in the future between Mona (and Morgan for cumulative considerations). Secondly this document outlines the practical issues of fishing vessels being able to continue fishing in which are poor weather autumn & winter fisheries. Finally with Mona (and Morgan cumulatively) being unique in covering so much of the sandy/gravelly Queen Scallop nursery & fishing grounds, there is a real risk of loss of their habitat and the commercial fishery we rely on, for which the Fish & Shellfish Ecology Chapter unacceptably also dismisses as an impact, rated as minor.

2. Current Queen Scallop fishing activity evidence and quantifying ground altered by OWF infrastructure

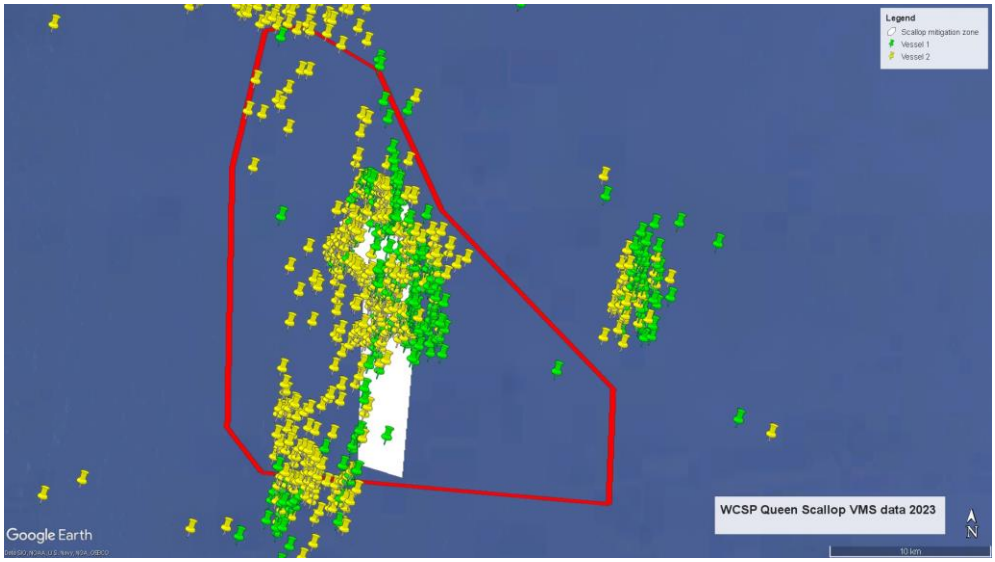
This section provides an initial background of Queen Scallop fishing for 2023 in relation to the Mona proposal area in the eastern Irish Sea as well as Morgan (separate project and application) which requires examination as the two projects collectively by the same developer capture most of the commercial Queen Scallop fishing ground in the eastern Irish Sea. It should be noted that the King Scallop fishery will also be negatively affected by the development but for the purpose of this response, our representation concentrates on the Queen Scallop fishery which

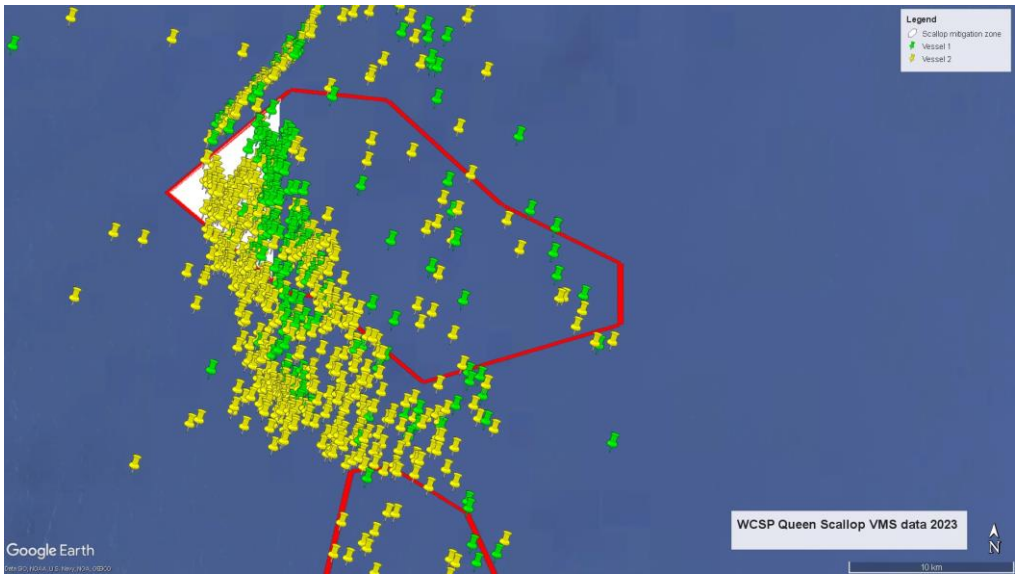
will we regard as more important in this circumstance. Further evidence on the impact to the King Scallop fishery can be provided on request.

The maps below shows 2hourly Queen Scallop VMS data for two of our vessels for the year 2023 in relation to Mona - and Morgan importantly for cumulative impact considerations. We do not hold GIS software other than Google Earth to analyse fishing intensity but in terms of spatial data, Mona and the export cable corridor to the south shall be situated on approx.. **38%** of 2023's fishing activity for Queen Scallops. This % assessment considers that the Scallop Mitigation Zone presented in the coexistence plan in its current form for Mona will not serve as a true Scallop Mitigation Zone where a vessel skipper would not be affected by OWF infrastructure, therefore our opinion considers the impact to be as high as 38% (note only based on 2023 data). This % affected would be reduced if the Scallop Mitigation Zone was perceived more by ourselves to actually compensate better than its current form (discussed in sections ahead).

The cumulative impact of Mona is further increased in a future scenario with Mona and Morgan both in construction and eventual operation shows that an additional 15% of 2023's VMS data shall fall within Morgan. Again the Scallop Mitigation Zone for Morgan which shall comprise of a triangular area to the west bound by Wind Turbine Generators and cable routing through the Scallop Mitigation Zone is even less convincing as an Scallop Mitigation Zone than Mona. Therefore for this reason the Scallop Mitigation Zone for Morgan will not reduce the effect the windfarm shall have on queen Scallop vessel operations. The overall cumulative effect is that **53% of Queen data for 2023 shall fall within the Mona and Morgan windfarm proposal areas**. With just over half the Queen Scallop fishery being subject to spatial squeeze, this will result in increased pressure and displacement in other areas affecting the health balance of the fishery.

Should the applicant consider designating more effective Scallop mitigation Zone deserving of the Scallop industry's needs to operate then the overall cumulative effect would be reduced from 53% to possibly 20-25%.





3. Impact of infrastructure & significance of effects

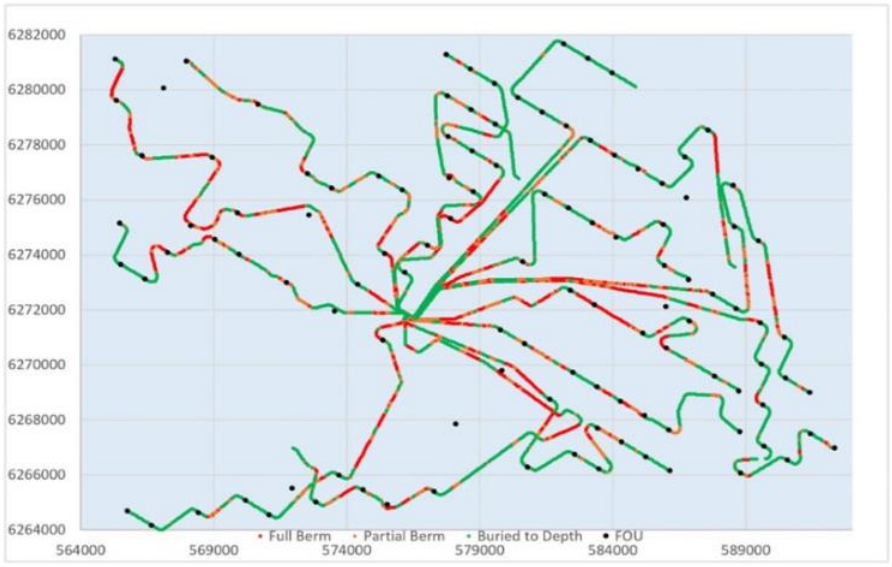
Page 108-115 of Chapter 6: Commercial Fisheries outline that there will be only a **minor** effect on Scottish west coast vessels, i.e. us as a receptor, during construction, operation and cumulatively. This is arrived at by the ES with a reliance that the Doc ref J10 (the coexistence plan) will deliver as a plan to revert fishing access to near-baseline conditions. We do not agree this scoring and we are of the opinion that there will be a **moderate or major** effect on our operations. Our justification is provided in this text.

3.1 Outline Fisheries Liaison and Co-Existence Plan

Through consultation with the applicant, a co-existence plan has been presented to support the application. This includes a set of measures which would help to

accommodate Queen and King Scallop fishing as much as possible in the situation where offshore windfarm infrastructure is constructed on scallop grounds in this area. For instance, the applicant has included a number of measures which we support such as north-south rows of wind turbine generators and cable routing with 1400m spacing. This supports the moving of fishing vessels who generally tow north touth with the tides when fishing in this area. There will also be a Scallop Mitigation Zone which is welcomed albeit is smaller envelope than we expected following consultation.

The main disappointing aspect of the co-existence plan however is the commitment towards cable burial between wind turbine generators with regards to both 0.5m minimum burial and caveated for use of rock / concrete mattress protection in areas of hard ground. We do not know at this stage from the survey work carried out by the applicant how successful they will bury cables (i.e. cable burial RA not visible at this stage). Drawing upon lessons learned and experience from other offshore windfarms we know there are hard areas of ground to the west within the Mona and we would anticipate that burial would not be achieved. This has been the case with Seagreen windfarm recently commissioned for which one of our fishing vessels fished within the windfarm this year. With unforeseen circumstances and poor construction planning, up to 49,000 tons of rock was dumped over cables, well in excess of the consented tonnage. The end result at Seagreen (as shown below) is that significant lengths of inter array cable layout is unburied and therefore our vessel would not tow Scallop fishing gear over. With regards to Mona there is harder ground to the west and there are also some 7 existing sub-sea cables which pass through the Mona area which our vessels already have to negotiate and avoid snagging. It is anticipated that a similar situation to Seagreen could arise with Mona with dumping of rock on the areas of hard ground and where the cable array will cross existing subsea cables. We are disappointed that the ambitions of the co-existence plan do not go far enough with a shallow target burial depth and open book in terms of ‘protection’ where burial cannot be achieved. We have seen EIA documents of other developments such as Seagreen and Moray East and when we have fished within them we find the end result is that burial is generally unsuccessful, hence why we are cautious with this proposed development.



Seagreen extract to fishing industry 2024: Green indicates full burial, red 1m rock protection and orange <1m rock protection

A further concern of the burial aspect of the development concerns the 0.5m minimum burial target and the risk of exposure. This is since cables buried within a sandy and gravelly substrate (which is typical across the central extents of Mona) are at risk of becoming exposed very quickly following construction. For instance, there are a number of exposed lengths of existing telecom cable already across the Mona proposal area. There is further vast evidence of this nearby (10miles southeast) at Gwynt y Mor OWF (commissioned 2015) in a near identical substrate, whereby in 2021 a notice to mariners was issued, including the statement "a *significant number of array cable exposures are still being reported. Due to the mobile nature of the seabed within the wind farm boundary these cable exposures are subject to change and may develop in areas where there were none previously*"[1]. Should Mona be constructed, it is inevitable that cables only buried 0.5m would become exposed quickly following construction. Exposed lengths would not only be unsafe to fish/tow over but they may encroach on corridors within the area which are left to fish.

The final flaw of the coexistence plan concerns the fundamental Scallop Mitigation Zone which is based upon us providing coordinates to the applicant (Figure 1.56, Doc reference F6.6.1). It is noted that the Scallop Mitigation Zone corridor as it stands is some 3.2km in width, however is only some 35% of what we communicated to the applicant (i.e. Figure 1.56, F6.6.1). If Figure 1.56 of Doc reference F6.6.1, was presented as the Scallop Mitigation Zone within Mona with a 5-6km corridor, we would perceive this as more proactive level of coexistence. Our understanding of the current proposal is that true coexistence and the Scallop Mitigation Zone has been tightened as a consequence of the developer choosing not to utilize the eastern extents of the original lease area due to poorer wind yields. This is a disappointing justification given that there are windfarms to the east of Mona in operation and should the applicant have developed to the east, would not have

encroached upon valuable fishing ground. Also essentially, Section 1.3.6.1 also suggests that the Scallop Mitigation Zone will be a let down to Queen Scallop fishing vessels such as ourselves as it (a) states that the Scallop Mitigation Zone will be further refined and (b) suggests that cables will likely run through the Scallop Mitigation Zone.

In general the Coexistence Plan offers a solution for coexistence with the greatest measures including 1400m turbine spacing, a 3200m Scallop Mitigation Zone and north to south rows of WTGs and cables. There are however too many caveats in the document and lacking in commitment to the Scallop industry who have enjoyed fishing on this ground for decades. As a result we anticipate the proposal to have a **moderate or major** effect on our operations and the next section justifies If consent is granted then measures need to be enhanced in regards to :

- A deeper cable burial target than 0.5m,
- Widen the Scallop Mitigation Zone by some 1-2km since the current Scallop Mitigation Zone is disappointingly not wide enough and only a portion of what was communicated as the most prominent fishing grounds for Queen Scallops. The document suggests the Scallop Mitigation Zone is indicative and will be refined which makes us further cautious about what the end result shall be. There needs to be a real commitment in this regard
- A commitment to not take cables through the Scallop Mitigation Zone.

If the recommendations are adopted as above we would envisage the overall negative effect on us as a receptor would be reduced.

3.2 Other practicality considerations

Weather

The Commercial fisheries chapter and coexistence plan does not necessarily factor enough in the impact that poor weather will have on decision making fishing vessel skippers. From experience, most skippers will only enter windfarms to fish when the weather conditions are ideal. The Mona project area is situated on top of autumn and winter Queen and King Scallop fisheries as dictated by the seasonality of the product, i.e. fished when yields are at their peak in the autumn and winter months. As a result fishery management strategies and closed seasonal seasons have been in implemented for years accordingly to account for this seasonality. We expect Mona to have a **High** level of magnitude on us a receptor as presently skippers will fish in slightly poorish weather, however will be hesitant to enter with the hazards imposed by a windfarm. It is particularly important access these grounds in the winter when the product and yield is very high in line with higher fish prices ahead of the busy Christmas period.

General navigation

We have concerns about the proposal's impacts on navigation and also cumulatively in mind of other windfarm proposals. From our experience of fishing in Seagreen Windfarm this year for King Scallops the fishing vessel skipper, in addition to concentrating on fishing had to secure the safety of the vessel in terms of : -

1. Other fishing vessels operating within the 'alley ways' between the cable routing between WTGs,
2. Other normal marine traffic
3. Windfarm survey vessels on site at the time – overtrawl
4. Guard vessels
5. Anchored Acoustic monitoring equipment
6. Wind turbine generators
7. Inter-array cables

The current coexistence plan does offer greater scope for coexistence compared to Seagreen on paper; however we expect the windfarm to not successfully bury all cables and resort to rock dumping or mattress protection. This would result in to our vessels and others having little confidence to tow over the cables, and subsequently lead to a heightened navigation risk. The plotter screen taken from one of our fishing vessels (below) this year within Seagreen shows the reality of a fishing vessel operating between cable routing and highlights the squeezing and therefore heightened risk of collision between fishing vessels. As discussed in the previous section, with poorer weather factored in and fishing vessels desperate to catch in peak season in the Irish Sea in the run up to the busy Christmas market, this risk is even more significant. A review of the Navigation section of the ES plays down the significance of this.

WCSP company vessel fishing activity within Seagreen windfarm 2024

The Mona proposal also raises concerns for transiting to and from ports such as Kirkcudbright when not fishing and also during emergency situations, e.g. airlifting of casualties, engine failure scenarios. This is particularly the case in terms of the cumulative impact of up to a total of 4 offshore wind farms proposed for the Irish Sea within current navigation routes between the fishing grounds and Kirkcudbright.

4. Fish and Shellfish Ecology

As a receptor which will be directly impacted by Mona, we are of the opinion that access to fish is of one course one moderate/major impact, however may not be as concerning to us as the potential for Queen Scallop habitat loss.

Of Doc ref F2.3, page 201 we strongly disagree with paragraph 3.11.5.14, that the cumulative effect on Queen and King Scallop biomass is "minor adverse", and such an assessment without any science is simply an assumption. Furthermore Table 3.34 concludes that there will be no ongoing monitoring required with regard to the effect that the project shall have on fish and shellfish. We view this as seriously irresponsible as there is simply no science to what impact a windfarm development is on Queen Scallops, let alone probably the largest Queen Scallop commercial fishery in Europe.

Windfarms have been developed on King Scallop beds around the UK as we have fished in and have shown survivability. King Scallops however are a different species and so far in the short term, their sensory structures appear to have shown to resist the effects of EMPS, construction noise, turbine vibrations etc; however there is no science / no one knows yet what wind farms will have one Queen Scallops. The coexistence plan makes an effort to leave a portion of the Queen Scallop ground within Mona free of development (Figure 1.3, doc ref J13), however we have serious concerns that the disturbance and alteration to the seabed to the east of this corridor shall detrimentally affect the unfished areas considered as nursery/spawning fishing ground by the fishermen. The following risks are as such : -

- Cable burial and change of substrate no longer supporting congregations of Queen Scallops and commercially viable levels
- Fixed Turbine disturbance to currents altering plankton distribution and larval dispersal over the Queen Scallop grounds, as indicated as a possible effect by Barbut et al., 2020);
- Local tidal energy losses of turbines and resulting sedimentation effects (Gill A.B et al., 2020)
- Fixed turbines & cable rock dumping creating artificial reefs encouraging invasive species such as starfish to explode in population (Gill A.B et al., 2020)

Due to the risks identified above to the Queen Scallop habitat, which are evidenced by what has been observed in other offshore windfarms and literature we cannot support the minor adverse scoring provided in the Fish and Shellfish Ecology chapter.

Further research should be undertaken before a potential catastrophe could occur in altering the Queen Scallop habitat which we rely on. Across the UK many windfarms have been constructed on shallow banks that support King Scallop dredging; of these the King Scallops are recruited from other areas of unfished seabed. Mona (and Morgan) proposals would be unique as they would capture the sandy gravelly ground where both spawning of Queen Scallops occurs and where they are recruited and subsequently fished year after year.

References

RWE Renewables UK Ltd: 2021. Gwynt y Môr Offshore Wind Farm Marine Co-ordinator Notice To Mariners

Barbut, L., B. Vastenhoud, L. Vigin, S. Degraer, F.A. Volckaert, and G. Lacroix. 2020. The proportion of flatfish recruitment in the North Sea potentially affected by offshore windfarms. *ICES Journal of Marine Science* 77(3):1,227–1,237,

Gill et al. (2020) Setting the Context for Offshore Wind Development Effects on Fish and Fisheries

KIS-ORCA website: The Risks of Fishing near Cables & Renewable Energy Structures