Our Ref: FH-Mona-OWProj/24-0001

Your Ref: EN010137 – Mona Offshore Wind Farm

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7 August 2024

To whom it may concern,

**SFF Response on Mona proposed offshore windfarm application Consultation**

This response to the application is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association.

**Summary**
The Queen scallop fishery is the most important fishery alongside other fisheries such as pelagic within the Mona array and supports many shoreside employment as well as offshore. If these fisheries cease to exist for whatever reason the impact on the local infrastructure and the coastal communities which this fishery supports would be devastating. This would also highlight serious misgivings in marine spatial planning, the Mona array should never have been given an agreement for lease, from a safety, navigational and socio-economic perspective.

The SFF fully recognise the need for renewable energy to tackle climate change, energy security, and to reduce consumer bills, however this should be achieved in a balanced manner. Certain arrays should never have been considered, Mona array being one of them, therefore for the following reasons highlighted within the written response the **SFF strongly objects to the application.**

West Coast Sea Products Ltd (WCSP), association members of the Scottish White Fish Producers Association (SWFPA), one of the SFF's constitute association members) have been catching and processing Queen Scallops in the eastern Irish Sea since 1971 and in addition King Scallops.

Furthermore, some pelagic fisheries also take place within the array area. The proposed Mona offshore windfarm array directly overlaps the most important Queen Scallop beds which WCSP and other SFF scallop vessel members rely on annually. The Mona array footprint is situated directly on top of the highest yielding Queen Scallop fishery in Europe. This fishery not only supports many local fishermen and processing employees on land in Kirkcudbright it also supports many more members of the SFF/SWFPA nomadic scallop fishing vessel.

The reality is this unique fishery cannot be displaced elsewhere, there is nowhere else that these species (Queen Scallops) can be caught round the UK coastline. Globally there are 4 main Queen Scallop fisheries which supply the French and American markets (Peruvian, Argentine, Chile, Faroese & UK (Irish Sea)).

**Volume 2, Chapter 6: Commercial Fisheries**
**Page 45. 6.5.2.4**

The significance of the effect upon commercial fisheries is determined by correlating the magnitude of impact with the sensitivity of the receptor. The particular method employed for this assessment is presented in Table 6.12. Where a range of significance of effect is presented, the final assessment for each effect is based upon **expert judgement**. It is SFF understanding that the **expert judgement** is the consultants that compiled the commercial fisheries chapter. Presently, there is no methodology or standardisation on how the impacts and effects are calculated, therefore we dispute the findings on the basis that it is not factual and only based on assumptions.

Despite efforts by the applicant and provision of the Draft Fisheries Liaison and Cooperation Plan (FLCP), we cannot support the application for the inevitable impact it will have on the Queen Scallop fishing and processing industry. The ES chapter defines the impact as Minor; we anticipate the effect of the development could be considerable and rate it as **Major**.

We would therefore request the applicant, and the expert judgement expand on why they define the impact as minor?

**Outline Fisheries Liaison and Co-Existence Plan (J10)**
Through consultation with the applicant, a draft FLCP has been presented to support the application. This includes a number of measures which would help to achieve the ambition of coexistence between the Queen and King Scallop fishery and the proposed Mona array. The applicant has included measures which we do support such as North-South rows of WTGS and inter array cables (IACs) with 1400m spacing. (However, the worst case could be reduced to 1250m in special circumstances). This aids fishing activities which are dictated by the tides when fishing in this area. The (SMZ) which although welcomed, is a smaller area than the SFF expected following consultation with the fishing industry and as highlighted there will be multiple IACs within the SMZ.

Crossings of the 4 existing telecommunication cables within the SMZ which will require rock protection which will in turn reduce the SMZ further as the rock protection footprint must be avoided by scallop vessels.

A significant concern of the FLCP is the commitment towards cable burial between WTGs of only 0.5m minimum burial depth and the use of rock protection in areas of cable crossings (67) and where burial depth cannot be achieved. It is unknown at this stage from the survey work carried out by the applicant how successful IACs will be buried. We feel that a Cable Burial Risk Assessment (CBRA)

should have been tabled prior to commitment on minimum burial depth. Carbon Trusts Guidance on Cable Burial 2015 which all CBRA are based states there should be at least 100% contingency on both anchor penetration and fishing gear whichever is the greater.

**We therefore suggest that this minimum burial depth must be revisited by the applicant prior to the determination.**

The WCSP fishing expertise in the array are more than aware of hard areas of ground to the west within the array who would predict that burial depth will not be achieved therefore, as a result would require rock armour protection. All applicants state within their EIAs that they would achieve 80% total burial, however, in most cases this is never the case.

The SFF are deeply concerned that the ambitions of the FLCP do not go far enough with a shallow target burial depth. Experience from other OWFs and SFF members fishing within them such as Seagreen and Moray East we have found consistently that burial is generally unsuccessful, hence why we are extremely concerned with the proposed development**.**

In addition, there is evidence of cables becoming exposed (10miles southeast) at Gwynt y Mor OWF (commissioned 2015) in a near identical substrate. Extract from Notice to Mariners NtM, "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, following construction that a series of cable exposures will occur and could render the FLCP worthless as it would be too high a risk to operate safely within the array.

An additional concern of the FLCP is the SMZ, which, based upon the WCSP providing coordinates to the applicant, the SMZ corridor as it stands is some 3.2km in width, however, is only circa 35% of what was communicated to the applicant. It is also noted that the SMZ is indicative, the SMZ could be reduced further.

Our understanding of the draft FLCP and the SMZ has been reduced because the developer chose not to utilize the eastern extents of the original lease area due to poorer wind yields. Given that there are operating windfarms to the east of Mona and should the applicant have developed to the East, the Mona array would not have encroached upon valuable fishing ground.

With implementation of the FLCP this would not reduce the impact adequately therefore we anticipate the proposal to have a **major effect on our operations**.

The Mona array and the export cable corridor (ECC) to the South shall be situated on circa 40% of 2023's fishing activity. In examining the SMZ detailed in the FLCP the net impact would mean that circa 30% of 2023 fishing activity for Queen Scallop fishing would fall within Mona not covered by the Scallop Mitigation Zone (SMZ).

**Other Considerations**

**Weather**

The Commercial fisheries chapter and FLCP does not factor in the impact that poor weather will have on decision making by fishing vessel skippers. Experience from existing fixed foundation offshore windfarms, most skippers will only attempt 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 measures and closed seasonal areas have been implemented, the SFF expects Mona will have a **High** level of magnitude for our members as presently skippers will fish in slightly poorish weather, however, will be hesitant to enter with the hazards imposed by a windfarm.

**General navigation**

The SFF have concerns about the proposal's impacts on navigation and cumulatively with regard to other windfarm proposals. Again, experience of fishing in other fixed foundation offshore windfarms i.e. Seagreen Windfarm in 2024 for King Scallops the fishing vessel skipper, on top of fishing had to secure the safety of the vessel with increased risk caused by: -

1. Other fishing vessels operating within the 'alley ways' between the cable routing between Wind Turbine Generators (WTGs).
2. Existing marine traffic.
3. Inter-array cables, and
4. Multiple rock protection measures.

The FLCP theoretically does offer greater scope for coexistence compared to Seagreen, however, we expect like Seagreen that Mona would find itself not being able to successfully bury cables in certain areas therefore requiring increased rock protection. This would result in SFF member vessels having little confidence to tow over the cables, and subsequently lead to a heightened fishing risk. The Mona proposal also raises concerns for transiting to and from ports such as Kirkcudbright when not fishing and 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 OWFs proposed for the Irish Sea within current navigation routes.

**Fish and Shellfish Ecology**

(Doc ref F2.3, page 201 paragraph 3.11.5.14)

We strongly disagree that the effect on Queen and King Scallop biomass is "**minor adverse**", and such an assessment without any scientific research is an assumption. Furthermore Table 3.34 concludes that there will be no ongoing monitoring required around the effect the project shall have on fish and shellfish. This evaluation is so disappointing and unjust, and this again is strongly opposed by the SFF, we have no scientific data for Queen Scallops therefore the impact cannot be deemed as **minor adverse.** The SFF would suggest that until proved otherwise the magnitude of impact should be raised to **moderate/major.**

**The SFF therefore insists that a robust monitoring plan must be put in place using a baseline of three years prior to construction, during construction and every three years after operation, through to decommissioning if the prosed Mona OWF achieves consent.**

Offshore Wind Farms have been developed on King Scallop beds around the UK, areas in which we have fished and observed the scallops' survivability. King Scallops, however, are a different species with sensory structures that have been shown to resist the effects of electromagnetic pulses (EMPs), construction noise, and turbine vibrations. However, there is no scientific data published yet on how offshore wind farms will impact Queen Scallops. The FLCP attempts to keep most of the Queen Scallop grounds within Mona free from development (Figure 1.3, doc ref J13), but we have serious concerns that disturbances and alterations to the seabed east of this corridor could detrimentally affect unfished areas considered by fishermen to be nursery and spawning grounds.

Further research is necessary into the ecosystem and the marine environment that could potentially alter the Queen Scallop habitat. Across the UK, many wind farms have been constructed on shallow banks that support King Scallop dredging; in these areas, King Scallops are recruited from other unfished seabeds. The Mona proposal would be unique as they would impact the sandy gravelly grounds where both the spawning and recruitment of Queen Scallops occur.

In addition, as the mentioned areas are suitable for herring spawning, the SFF are concerned about the Development impacts on all commercial value fish species in the area, especially the Development impacts on the herring which are also particularly sensitive to noise impacts as they have swim bladders which are involved in hearing (Popper et al., 2014)/ Sub-section 9.5.3.1 of this SR.

We are of view that Developers must take heed of ICES advice on Irish Sea herring. ICES state in their advice for 2024 for Herring in Division 7.a North ***that activities that have a negative impact on the spawning of herring are considered as a source of risk for the species***. Therefore, SFF propose the above-mentioned ICES advice to be taken into account and acted upon at determination stage.

The link to ICES advice on Irish Sea herring is provided as follows: Irish Sea Herring 7.a North

On behalf of the SFF we appreciate the opportunity to submit this written response and reiterate the **SFF robustly objects to the application as it negatively impacts our members.**

Best regards

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**Scottish Fishermen's Federation**