BODORGAN MARINE LIMITED
ESTATE OFFICE
BODORGAN
ANGLESEY LL62 5LP

To the Planning Inspectorate

16 October 2024

Dear Sirs,

Mona Offshore; virtual Hearing scheduled for 23 October 2024; Interested Party: 20048554

I am writing to ask whether Bodorgan Marine Limited ('**BML**') might be allowed to participate in the 23 October Hearing to be held virtually. I note with regret that the 7 October deadline for requests for participation to be made has passed.

The session in which BML would like to participate is item 7 on the agenda which deals with Commercial Fisheries.

The principal issue that BML would like to see examined under agenda item 7 of the 23 October Hearing and which I note has not been included on this agenda is:

Whether the Applicant has satisfied the policy requirements of the Governments of both the United Kingdom and Wales in relation to the design and intention of its mitigation proposals relating to fisheries.

BML is and in the light of the Applicant's replies to its representations remains of the view that the Applicant has not only not satisfied these policy requirements but has made no purposeful attempt to satisfy them. BML's approach to this issue is as set out in its May and August 2024 representations which, in brief, has been to assess the mitigation proposals and their evolution against a clear understanding of these policy requirements.

BML believes that this issue is significant[1] and to date has had no opportunity to be examined in either the present Examination or the examination of other offshore wind energy development proposals.

If BML's request to participate in the 23 October Hearing is acceptable to PINS, BML would like to be supported by Mr. James Wilson of Deepdock Limited. This is because:

1. BML would hope that there would be an opportunity to examine the place and potential of co-located aquaculture as a preferred form of policy-compliant mitigation.

2. Mr. Wilson is a leading authority on co-located aquaculture and was the lead aquaculture industry participant in the one offshore wind energy/aquaculture co-location trial to take place in UK waters which is referred to in the CEFAS Report, with the relevant extract being set out in the Schedule.

Yours faithfully,

[redacted]

George W. Meyrick
Director

[1] BML understands that the Crown Estate is currently re-examining the principle of the co-location of aquaculture and offshore wind energy development.

SCHEDULE

'Welsh National Marine Plan

A review of the potential for co-existence of different sectors in the Welsh National Marine Plan Area

CEFAS 8 April 2020'

Extracted from pages 18 and 19:

In Wales, a practical blue mussel cultivation trial was designed in 2010 by Deepdock Ltd. with assistance from Seafish (Sea Fishing Authority) at the North Hoyle Wind Farm site off Rhyl to investigate aquaculture co-location with OWFs. The OWF contains 30 monopiles in 10 meters of water (at low tide) and was constructed in 2003. The information provided in the final report prepared by Seafish shows that mussels grew well, but unexplainable mortality occurred at harvest which requires further investigation (Syvret et al., 2013).

This trial demonstrated that aquaculture activities could be carried out without a negative impact on wind farm operations. Further commercial-scale trials were recommended to both refine the technology to grow mussels offshore on fixed gear and assess environmental impacts and economic performance. Anticipated socio-economic benefits from co-locating aquaculture within OWFs include (Syvret et al., 2013):

- Job creation and employment opportunities;
- Potential for expanding seafood provision from UK waters;
- More space left in the see for other economic or recreational activities in the region; and,
- Knowledge and experience acquired through the trial to mitigate impact on local fishing grounds.

To our knowledge, no offshore co-location trial combining mussel farming and OWFs is going on currently in Welsh waters. The mussel aquaculture sector appears to have the greatest current potential to be combined with offshore wind arrays, and thus meeting economic, environmental and technical requirements (Jansen et al., 2016).