

We have been involved in the fisheries stakeholder group who have met with the applicant since 2021. Part of this time has been spent working with the applicant and other fisheries stakeholders on the Statement of Common Ground Document. We would like to take this opportunity to highlight the points that remain unresolved/ unagreed and our reasoning behind our position. We will use the reference numbering system as used in Table 1.4, the agreement log of the Statement of Common Ground.

CF.EIA.3 - We have noted the applicant's explanation that fish surveys that have been undertaken were for the purposes of future conversations concerning underwater noise mitigation options in the underwater sound management strategy. Our position remains that fish survey data should be made available to fisheries stakeholders, regardless of the reason for collecting it. This would set a meaningful precedent on behalf of the applicant for this project and for other future offshore developments. Fishery survey data is valuable and we believe that when this type of data is shelved away it represents a missed opportunity to further our understanding of the fish stocks that we manage.

CF.EIA.5 - ANIFPO cannot speak on the behalf of AFBI or other scientific bodies that support UK devolved administrations. However we are involved in a number of joint projects in partnership with AFBI. A wide spread of sample locations is critical in accounting for natural, inter annual variation and therefore a reduction in sampling area has the potential to reduce AFBIs ability to undertake robust stock assessments of key commercial fish species. We advised the applicant in October 2024 that in the same year, the AFBI research vessel had undertaken juvenile cod and herring surveys within and in close proximity to the Morgan development area. Our position is that this has implications for future ICES advice on TAC/ quota and sustainable fishing opportunities.

The applicants response was that there are still sufficient sampling collection sites for full Irish Sea coverage. ANIFPO responded that it is not the role of the applicant to decide what sufficient sampling collection sites for full coverage is. This is for AFBI/ ICES to advise upon.

CF.EIA.7 - We cant agree to the SMZ being described as a mitigation measure if cables are situated within it.

CF.OFLCP.P6 - See earlier comment on SMZ.