Raywood, Simon

From: Jimmy Kelly [redacted]
Sent: 27 February 2025 09:26
To: Morgan Offshore Wind Project
Cc: [redacted]
Subject: NIFPO Morgan Submission
Attachments: NIFPO Morgan Submission.docx

Dear Sir/Madam,

Please find attached a report outlining NIFPO's concerns regarding the Development Consent Order for the Morgan Offshore Wind Project.

We respectfully request that planners mandate all relevant environmental and habitat protection measures within any consent order and establish independent monitoring to ensure full compliance.

As of this date, we remain unaware of the proposed cable routing plan, its potential conflicts with fishing activities, and the cumulative impact of both construction and operational noise on migrating and spawning species—issues that could have serious consequences for our industry.

We, therefore, submit our concerns to the Inspectorate for careful and thorough consideration.

Kind regards,

Jimmy Kelly

NORTHERN IRELAND
Fish Producers' Organisation

REPRESENTING FISHERMEN
SUPPORTING FISHING COMMUNITIES
SAFEGUARDING THE FUTURE

Official Response to The Planning Inspectorate

Regarding Development Consent Relating to the

MORGAN OFFSHORE WIND PROJECT

Introduction

This response sets out the position of the Northern Ireland Fish Producers Organisation (NIFPO) regarding Morgan Offshore Wind Ltd.'s request to agree to its proposed plans for the Morgan Offshore Wind Farm (OSWF) and enter a Statement of Common Ground (SoCG).

At this stage, NIFPO are unable to enter a SoCG, as several critical concerns remain unaddressed, unclear, or undecided by the applicant. These concerns, which are outlined in this report, present significant issues for NIFPO and its members.

The NIFPO Board will assess applications for an SoCG related to OSWF developments in the Irish Sea and Firth of Clyde on a case-by-case basis, but only once full disclosure and a comprehensive approved plan of works have been submitted for review.

The long-term impact of OSWF installations on fisheries remains uncertain, particularly regarding habitat disruption and the effects of noise on migrating and spawning species. Given the current lack of sufficient research data, these risks cannot be fully evaluated at this time.

Entering a Statement of Common Ground under these conditions—without key construction site details and given the lengthy duration of the proposed OSWF licence—would not be in the best interests of our industry or our members.

A summary of our concerns is listed in Appendix 1 at the rear of this report.

NIFPO Submissions Respectfully Submitted for Consideration

Agenda 3 – Shipping & Navigation Concerns

3a - Navigation Dangers in Restricted Channels with High-Density Fishing Activity

Merchant vessels transiting narrow and restricted channels with high-density fishing activity face significant navigational hazards. Fishing vessels often alter course unpredictably to avoid snagging trawls on subsea hazards or while hauling gear, making it difficult for larger vessels to anticipate and manoeuvre safely around them.

These risks are exacerbated by the increasing occurrence of vessel blackouts due to modern fuel contamination, leading to sudden loss of propulsion and control. In confined waterways, even a brief power failure can result in a collision with another vessel or a turbine, causing severe environmental and economic consequences.

Additionally, the nearest salvage or rescue tug with sufficient bollard pull to assist large vessels in distress is approximately 36 hours away by sea, rendering it ineffective in time-critical emergencies. Without immediate in-field towage assistance, the risk of prolonged obstruction, environmental damage, and potential loss of life is significantly heightened.

To ensure reduce risks and ensure a quick response to any incident consideration should be given to a dedicated emergency towage vessel assigned to the Offshore Windfarms in the Irish Sea, which could provide immediate assistance when required. A suitable vessel was deployed in the area for many years by Vroon Offshore providing protection for nearby gas installations, and it would only be a matter of negotiating an expansion of its role and thus addressing all concerns.

3b - Navigational Hazards to Trawlers from Unburied Cables

Leaving cables unburied presents significant risks to maritime operations, particularly for trawling vessels:

- **Risk of Entanglement** – Unburied cables can become ensnared in trawling gear, jeopardizing vessel and crew safety while causing financial losses due to damaged equipment and disrupted operations. Likewise exposed rock armour or cable protection mats present additional hazards. We would ask planners to ensure that every effort is made to avoid any additional hazards to trawling in the proposed SMZ or other fishery area.
- **Potential for Vessel Capsizing** – A trawler snagging a submarine cable may experience sudden and forceful deceleration, compromising stability and, in extreme cases, leading to capsizing.
- **Installed Cables** – As yet the Morgan OSWF has yet to formally advise the industry of the final location of the proposed cables and as such, we cannot accurately assess the dangers or disruption to our fleets fishing activities. Only when the final site plan and cable protection measures has been agreed on can conduct our own impact assessment. We would therefore respectfully ask planners to ensure that full cable specification and installation plan is made available to us prior to consent approval.

To ensure the safety of both fishermen and the cable infrastructure, the applicant, panel, and central government must fully consider third-party risks to critical underwater infrastructure and implement appropriate safeguards.

Agenda 4 – Civil & Military Aviation and Radar

NIFPO currently has no concerns regarding this matter.

Agenda 5 – Commercial Fishery Concerns

5a - Dangers of Noise Disturbance in Scallop and Herring Spawning Areas Around the Isle of Man

Noise disturbance poses a significant threat to scallop and herring spawning areas around the Isle of Man. Herring, known for their sensitivity to underwater noise, can be disrupted in their migration to spawning grounds, potentially leading to reduced reproductive success. Scallops can experience stress responses that impact their growth and larval development.

Irish Sea Herring Spawning at Critical Levels

The ICES (International Council for the Exploration of the Sea) Advisory Committee reports that Irish Sea herring spawning biomass has fallen below critical levels, raising serious concerns about stock sustainability. ICES now calls for stricter assessments of non-fishing activities impacting herring spawning grounds.

Key concerns include dredging, marine aggregate extraction, and offshore wind farm (OSWF) construction near known herring habitats. These activities disrupt the stable, coarse gravel beds essential for autumn herring spawning, affecting egg adhesion, recruitment, and stock recovery. Habitat loss from sediment displacement, turbidity increases, and direct substrate removal poses significant risks.

Beyond habitat disruption, increased industrial activity introduces additional stressors such as underwater noise and hydrodynamic changes, potentially affecting spawning behaviour and larval survival. Given the already fragile state of herring populations,

ICES urges targeted research and stronger regulatory measures to mitigate these threats.

Marine development planners must incorporate ecosystem management into decision-making, ensuring conservation priorities are upheld. Adopting a precautionary approach is essential to prevent further declines and support the recovery of Irish Sea herring stocks. Recovery of these stocks is vital to ensure food security for the nation and ICES recommendations must not be overlooked.

5b - Impact of Wind Farm Installation and Survey Activities

Planned wind farm installation and survey activities introduce multiple noise sources, including:

- Vessel activity
- Geophysical surveys (e.g., multibeam sonar and sub-bottom profiling)
- Pile driving for turbine foundations
- UXO-related noise

These disturbances may interfere with the migration routes of herring and could cause fish to abandon the Douglas Bank spawning area. Timing of survey and installation activities should be carefully managed, with noise-intensive activities restricted during peak spawning seasons (August–December).

5c - Effects of Noise on Scallop Spawning Areas

Scallops rely on detecting vibrations in the water, making them particularly sensitive to underwater noise. High-intensity noise exposure can disrupt biological processes, leading to:

- Stress and Physiological Impacts: Noise-induced stress may divert energy from growth and reproduction.
- Disruptions to Larval Development: Increased stress and environmental instability can impair larval survival rates.
- Reduced Feeding: Frequent valve closures in response to noise reduce feeding efficiency and energy intake.
- Sediment Disturbance: Noise-related seabed disturbances can resuspend sediments, smothering scallop larvae.

Studies show that scallops exhibit strong responses to low-frequency sounds below 200 Hz, with juveniles being more sensitive than adults. Continuous exposure can impair growth and reproductive success, affecting population sustainability.

Habitat Disruption Effects

Scallop habitats in the Irish Sea and around the Isle of Man are particularly susceptible to disturbances from dredging and trawling. These activities can:

- Reduce Biodiversity: Scallop dredging significantly damages habitats crucial for spawning and juvenile development.
- Resuspend Sediments: Disturbed sediments can smother scallop beds, affecting larval settlement and survival.

Isle of Man Scallop Fishery

- Economic Contribution: Before the COVID-19 pandemic, the Isle of Man's scallop industry supported approximately 300 jobs and was valued at around

£20 million annually, making its long-term sustainability crucial to the island's economy.

- Management Initiatives: To ensure sustainability, the Isle of Man government has implemented a Long-Term Management Plan (LTMP), focusing on co-management between fishermen, producers, and marine scientists. This approach aims to balance environmental protection with economic viability.

To the best of our knowledge, extensive Offshore Wind Farm (OSWF) developments in habitat-sensitive areas were not considered at the time of LTMP implementation. Given the potential risks to scallop populations, the LTMP may require reassessment to address emerging environmental challenges.

5d - Infield Export & Transmission Cables - Environmental Impact of Subsea Cable Trenching & Security Considerations.

The installation and maintenance of submarine cables raise concerns about:

Trenching is widely used to protect infrastructure from external threats such as fishing activities and anchoring. However, this practice can have significant environmental consequences:

- **Seabed Disruption:** Trenching alters the physical structure of the seabed, resuspending sediments into the water column and increasing turbidity. This can smother benthic organisms, disrupt habitats, and potentially release previously sequestered contaminants into the marine ecosystem.
- **Minimizing Ecological Impact:** Where trenching is unavoidable, it is essential to use techniques that reduce sediment displacement and habitat destruction.

Precision jetting and mechanical trenching methods should be tailored to seabed conditions to limit environmental disturbance.

Implementing best practices in cable burial can help balance infrastructure protection with marine ecosystem conservation.

- **Lack of Industry Consultation Regarding Strategic Route Planning**

Careful cable route selection is essential to minimizing impacts on sensitive ecosystems and high-traffic fishing areas. Avoiding ecologically critical zones and regions heavily used by trawlers reduces the risk of environmental disruption and maritime conflicts.

As previously stated, the applicant has yet to provide detailed cable routing information, preventing the fishing industry from fully assessing the potential risks associated with their placement.

- **Cable Security Risks**

NIFPO recognizes that, considering recent activity in the Irish Sea, central government may advocate for full cable trenching to mitigate the risk of hybrid attacks from non-state actors. However, the panel must carefully weigh-up the balance between national security and food security, ensuring that measures to protect infrastructure do not lead to significant disruption of critical spawning grounds.

5e - Mitigation Measures Requested by NIFPO Members

To mitigate the impact of noise disturbance on spawning stock and a reduction in habitat disturbance, NIFPO requests the following:

- Full compliance with CIRIA C754 - This is highly relevant to offshore wind farm construction, as it provides best practices for minimising environmental risks and ensuring compliance with regulations. Such assurances would ease some of NIFPO`s membership concerns regarding habitat disturbance.
- Full compliance with the new 2025 DEFRA Marine Noise Regulations.
- Seasonal restrictions on noise-generating activities and habitat disturbance, especially during herring spawning months.
- Implementation of low-noise technologies.
- Establishment of buffer zones around known spawning grounds.
- Continuous acoustic monitoring.
- Independent monitoring by approved marine mammal observers.

Agenda 6 – Other Offshore Infrastructure & Sea Users

NIFPO will be keeping the matter under review as we are aware of other planned OSWF`s in the adjacent area. Collectively, numerous OSWF in the Irish sea will be disastrous for the fishing industry and we must take steps to ensure sustainable coastal communities survive in addition to providing food security for the nation.

Agenda 7 – Offshore Ecology & Ornithology

Unexploded Ordnance (UXO) Clearance and Environmental Protection

In the event of having to clear any ordnance and given environmental concerns surrounding this issue, the use of low-order deflagration techniques should be mandated over high-order detonation to reduce acoustic impacts and seabed cratering.

NIFPO urges the applicant to comply fully with the January 2025 Marine Noise Policy and the Joint Nature Conservation Committee (JNCC) guidelines regarding UXO clearance at the Morgan OSWF and future sites within the Irish Sea and Firth of Clyde.

Agenda 8 – Development Consent Order (DCO) & Deemed Marine Licences (DMLs)

- NIFPO respectfully requests that the panel stipulates within the Development Consent Order (site licence), that the applicant must fully comply with 2025 noise regulations, JNCC guidelines and the contents of CIRIA C754.

.**Agenda 9 – Proposed Statement of Common Ground**

NIFPO cannot currently enter a Statement of Common Ground until the applicant provides the following:

1. A comprehensive and detailed cable routing and protection plan, including all proposed cables within the “SMZ” common fisheries zone. This lack of transparency significantly hinders the fishing industry's ability to evaluate potential navigational hazards, develop mitigation strategies, and engage in constructive dialogue with developers regarding the cables.
2. A written undertaking to comply with the 2025 noise regulations, JNCC guidelines and the contents of CIRIA C754.
3. NIFPO are interested to learn of the applicants’ proposals for financial redress to displaced fishers and affected community stakeholders during the whole duration of the OSWF licence, with specified review terms included.

No party is authorised to enter into any agreement or discussion with the applicant without NIFPO Board approval. The Board will nominate representatives to ensure due diligence and safeguard members interests.

Conclusion

NIFPO advocates for a balanced strategy that integrates thorough planning, environmentally responsible installation practices, and clear, ongoing communication with maritime stakeholders. This approach is critical to protecting marine ecosystems and maintaining sustainable fisheries.

It is well-documented that offshore wind farm (OSWF) development poses significant risks to fisheries due to noise and habitat disturbances, which can disrupt migration and spawning activities. To mitigate these impacts, it is essential that the applicant and planners also implement the following measures:

- Seasonal restrictions on site construction to prevent disruption during critical spawning and migration periods.
- Robust in-field environmental monitoring to assess and address potential impacts in real time with live view data sharing.
- Effective noise reduction strategies in accordance with the latest scientific and regulatory guidelines.
- Full regulatory compliance with all applicable environmental protection frameworks.

Failure to implement these protections could contribute to severe declines in fish populations and broader ecological harm. NIFPO strongly urges the planners to ensure that the applicant adopts these measures and engages in direct negotiations .

As previously stated, NIFPO will evaluate each OSWF development within the Irish Sea and the Firth of Clyde on a case-by-case basis.

Only when NIFPO is fully aware of all elements relating to offshore construction method plans, cable routing and the imposed environmental requirements placed on the applicant by planners, can NIFPO reconsider its position on the Statement of Common Ground. As an industry we need to know all this information well in advance so as we can make informed decisions.

This report is therefore respectfully submitted to the panel on behalf of the NIFPO Board of Directors

Signed: *Jimmy Kelly*

Position: *NIFPO Offshore Safety & Training Director*

Dated this the *27th* **day of** *February* **2025**

Please see “Appendix 1” attached, for a summary of our concerns.

Appendix 1

Report Summary: Offshore Windfarm Development in the Irish Sea – Key Considerations

NIFPO would respectfully ask planners to ensure the following points receive due consideration and that all environment and habitat protection measures are mandated in their Consent Approval for this project.

To minimize risks and ensure a swift response to potential incidents, it is recommended that a dedicated emergency towage vessel be assigned to cover all the Offshore Windfarms in the Irish Sea. A similar vessel was previously deployed in the area by Vroon Offshore to safeguard gas installations, and by expanding its role to cover OSWF installations, would effectively address all navigation safety, collision response and emergency towage concerns.

Planners must take all necessary measures to prevent additional hazards to trawling in the proposed Special Marine Zone (SMZ) or other fishery areas. In this regard, we respectfully request that planners:

- **Ensure full compliance** with CIRIA C754 guidelines for offshore wind farm construction to mitigate environmental risks and uphold best practices.

- **Make available** the full cable specification and installation plan **prior to consent approval** to allow for informed stakeholder review and input.
- **Integrate ecosystem-based management** into decision-making processes to ensure conservation priorities are upheld.

Additionally, specific environmental and regulatory measures should be implemented, including:

- **Marine Noise Mitigation Measures:**
    - Compliance with the **2025 DEFRA Marine Noise Regulations** to minimize disturbance to marine life.
    - Seasonal restrictions on noise-generating activities, particularly during herring spawning periods.
    - Implementation of low-noise technologies.
    - Establishment of buffer zones around known spawning grounds.
    - Continuous acoustic monitoring.
- **Independent Monitoring & Oversight:**
    - Field surveys conducted by recognized marine laboratories such as AFBI during the duration of the licence and the data shared with fishing organisations.
    - Deployment of independent **JNCC-approved marine mammal observers** throughout the construction phase.

These measures are critical to balancing offshore wind development with marine conservation, fisheries protection, and regulatory compliance.

NIFPO respectfully submits our concerns to the panel for consideration and direction.

Jimmy Kelly

NIFPO Offshore Safety & Training Director - 27th February 2025