From:

Sent: 14 March 2025 09:58

To: XLinks

Cc: point-notification.espoo (RWS WVL) **Subject:** Response Netherlands to Xlinks Morocco-UK Power Project

Follow Up Flag: Follow up Flag Status: Flagged

Categories: EST

Dear sir / madam,

Thank you for the opportunity to react on Xlinks Morocco-UK Power Project, following the letter dated 31 January 2025 with reference number EN010164. Please find below the response from the Netherlands. We would welcome the opportunity to stay involved in the remainder of the process on a regular basis.

1. Ecology

Cables emit electromagnetic fields and potentially have an impact on migratory fish and elasmobranch species. The exact impact is not fully understood, but it is recommended to take this into account. Please consider international collaboration on this aspect. The Netherlands has also published research, please find this on: https://open.rijkswaterstaat.nl/@180353/current-state-knowledge-electromagnetic/

Moreover, effects of electromagnetic fields will be present throughout the duration of the project, not temporary, as claimed in the EIA.

2. Cumulative effects

Many North Sea countries are developing offshore infrastructure in order to meet their net zero goals to combat climate change. When using the seas more intensively, there is an increased need for us all to assess impacts on ecology and implement adequate measures to limit these impacts. This is necessary because we have a shared duty to maintain the important ecological services the North Sea provides us with. As such, North Sea basin-wide cumulative effects ought to be considered adequately.

Assessing cumulative impacts is challenging indeed. The Netherlands, however, has been quite successful in conducting such ecological research. We would therefore like to refer to the Framework for Assessing Ecological and Cumulative Effects in which international cumulative effects of wind farms have been calculated. Please find this on: https://www.noordzeeloket.nl/en/functions-and-use/offshore-wind-energy/ecology/accumulation-ecological-effects/framework-assessing-ecological-cumulative-effects/

3. EIA scope

The environmental impact assessment only seems to cover the part of the electricity cable to be installed in UK waters, whilst it is the full length of the cable across the Channel that creates possible negative transboundary effects for migratory fish and elasmobranch species. If possible, the Netherlands is curious to know whether an environmental impact assessment has been done for the entire scale of the proposed development. If so, we are eager to receive this information.

We hope that our response is helpful to your process. We would appreciate it to keep in touch about the mentioned issues and hope you will provide us with more information on the further process. If there are any questions, please do not hesitate to get in touch.

With kind regards,

Advisor North Sea

Rijkswaterstaat

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