



Our Ref: MM/amg 16-045

Your Ref:

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Dear Sirs

BOWL Post Consent Cable Plan

The Scottish Fishermen's Federation (SFF), is pleased to comment on this plan on behalf of the 500 plus fishing vessels and businesses in membership of its Constituent Associations: the Anglo-Scottish Fishermen's Association, the Clyde Fishermen's Association, the Fife Fishermen's Association, the Fishing Vessel Agents & Owners Association (Scotland) Limited, the Mallaig and North-West Fishermen's Association Ltd, the Orkney Fishermen's Association, Scallop Association, the Scottish Pelagic Fishermen's Association Ltd, the Scottish Whitefish Producers' Association Ltd and the Shetland Fishermen's Association.

The SFF would consider the plan as offered is deficient in that it provides no actual description of where the 20km of exposed cable actually lie. For the fishing industry to consider the plan properly that information is essential.

Further in 6.3.1 and 6.3.2, despite table 5.1 showing that there have been 5 previous surveys in the area, the developer is unable to state with certainty that there are no hazards on their proposed route and still has an allowance for micro siting. Again this lack of specific details is of no use to the fishing industry for consideration of the detail of the cable.

The cable vessel deployment needs to be specific about whether or not it uses anchors and therefore also needs to describe how they will deal with any mounds or berms caused by this activity.

The paragraph 10.1.2 gives the fishing industry insufficient satisfaction about burial and must include the provision of proof in one form or another that burial has occurred and berms are not a hazard, and include the fishing industry in any decision as to the need for CCTV or other work needed.

Members:

Anglo Scottish Fishermen's Association • Clyde Fishermen's Association • Fife Fishermen's Association • Fishing Vessel Agents & Owners Association (Scotland) Ltd • Mallaig & North-West Fishermen's Association Ltd • Orkney Fisheries Association • Scallop Association • Scottish Pelagic Fishermen's Association Ltd • The Scottish White Fish Producers' Association Ltd • Shetland Fishermen's Association

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With regard to 10.1.5 the fishing industry needs to be satisfied that the over trawl trials have been done with sufficient credibility that vessels can safely use the area.

Finally, there is no mention of any use of local Guard Vessels during the cable laying, which the SFF would consider essential if at any time unburied cable is to be left unattended on the seabed.

Yours faithfully



Bertie Armstrong
Chief Executive
Scottish Fishermen's Federation