Queiros J (Joao)

From:	><a <="" href="mailto:asfb.org.uk" th="">
Sent:	29 November 2013 14:05
To:	MS Marine Licensing
Cc:	Brian Davidson
Subject: Attachments:	Seagreen Seagreen Addendum to ES.doc
Dear Joao,	
Please find attached a respo me if you require any furthe	onse to the Seagreen development on behalf of ASFB. Please do not hesitate to contact or information.
Best regards,	
	nning Director Association of Salmon Fishery Boards Canning Street, Edinburgh, EH3 8EG @asfb_scotland
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Association of Salmon Fishery Boards

Capital Business Centre, 24 Canning Street, Edinburgh, EH3 8EG
Tel: | www.asfb.org.uk

29 November 2013

Mr Joao Queiros Marine Scotland Licensing Operations Team Marine Laboratory PO Box 101 375 Victoria Road Aberdeen AB11 9DB

Dear Mr Queiros,

ASFB response to Seagreen Addendum to Environmental Statement

ASFB welcome the further detail provided, and recognise the willingness of the developers to consider contributing to strategic monitoring and potentially building mitigation into the construction schedule. However, we maintain our belief that there remains insufficient information to make an adequate assessment of the potential effect on salmonid populations. We recognise that these information gaps can only reasonably be filled by large-scale, strategic research, but until such time as we are able to assess risk in the light of such information we maintain our objection to this development. We recognise that it would not be reasonable for developers to deliver such strategic research in isolation, but we also believe that it is reasonable to expect developers to contribute to the funding of such research.

ASFB are members of the steering group overseeing the national strategy into strategic research for offshore marine renewables and anadromous fish. We will continue to engage positively with this process, in order to develop and help deliver a credible and effective research strategy. It is clear that the strategy will not be developed in time to inform several of the developments currently in the consenting process. We would emphasise the importance of developing a finalised, agreed research plan, with a clear time schedule for delivery, at the earliest possible date. It is vital that adequate resources are made available to this work, in order that these key questions can be answered, in a robust and timeous manner. This would allow migratory fish interests to approach the consenting process in the knowledge that a strategy is in place to address the legitimate concerns relating to possible negative interactions resulting from the construction and on-going operation of these developments. In the absence of such a strategy, it is not possible for ASFB to withdraw our outstanding objection to the Seagreen development.

Finally, we would emphasise the importance of the process adopted towards consent being flexible enough to take into account relevant information relating to migratory fish, as and when such information becomes available. It is therefore important that conditions are included which allow appropriate additional mitigation to be put in place, should negative interactions prove to be more likely than set out in the ES.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,



ASFB Policy and Planning Director