

Consultation Responses – April 2025

Maritime and Coastguard Agency

From: [navigation.safety](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [Nick Salter](#); [Vinu John](#); [Vaughan Jackson](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 23 May 2025
Date: 12 May 2025 11:37:18
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good morning, Amy.

Thank you for the opportunity to comment on the Navigation Safety and Vessel Management Plan (NSVMP) for the Culzean Floating Offshore Wind Turbine Pilot Project. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents received. We would like to comment as follows:

The NSVMP has been prepared to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (marine licence number MS-00010921) as summarised in table 1.1. We acknowledge that the plans are effectively 'live documents' and will be updated throughout the lifetime of the project with relevant information as stated in section 1.6. The project state that they will consult MD-LOT where any updates are required. This is welcomed by the MCA and we will be available for comment on these changes if required.

We can confirm that the MCA are content with the provided NSVMP have no further comment at this stage.

If you have any questions regarding this response, then please do get in touch.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation



Maritime &
Coastguard
Agency

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[Redacted]

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Southampton SO15 1EG



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NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 23 May 2025
Date: 20 May 2025 16:52:07
Attachments: [image001.png](#)

Dear Amy,

Thank you for consulting us on the Navigational Safety and Vessel Management Plan (NSVMP) submitted by TotalEnergies as part of post consent plan requirements for the Culzean Floating Offshore Wind Turbine Pilot Project. We have reviewed the NSVMP (document reference: GB-CZT-00-TOTA-000008, revision 01), which has been submitted to satisfy requirements of marine licence conditions 3.2.8 and 3.2.10.

We consider the NSVMP to be generally fit for purpose, subject to the following points and advice included below for further consideration:

- <!--[if !supportLists]-->• <!--[endif]-->The NSVMP should better reflect the need for vessel operators to be made aware of the [Scottish Marine Wildlife Watching Code](#) (SMWWC). We advise that adherence to the guidance and principles of the SMWWC and [Guide to Best Practice for Watching Marine Wildlife](#) will help to further minimise any potential disturbance to marine wildlife, particularly during vessel transit.
- <!--[if !supportLists]-->• <!--[endif]-->Location of 'working ports' are listed in section 6. Indicative vessel transit corridors have not been provided. We advise that vessel transit corridors should follow established shipping routes where practicable, which will also help to further minimise any potential disturbance.
- <!--[if !supportLists]-->• <!--[endif]-->We welcome the inclusion of the Operation and Maintenance (O&M) phase and advise that further revisions to the plan may be required once more is known about this period. Revisions should be submitted prior to the changeover from Construction to O&M activities. Noting section 1.6 which acknowledges that updates and revisions of the NSVMP may be required as the project progresses.
- <!--[if !supportLists]-->• <!--[endif]-->Section 6 confirms use of the Wergeland Halsvik AS port in Norway for the following quayside activities - IAC cable storage, mooring system storage, floater assembly, load out and WTG integration & commissioning. Subject to availability and facility requirements indicative ports for the O&M phase include Wergeland, Nigg and Aberdeen. As highlighted in our advice recently issued (dated 17 April 2025) regarding the Culzean Construction Method Statement (CMS) and Cable Plan (CaP) other relevant post-consent plans may need to be updated to include this updated information on port locations.
- <!--[if !supportLists]-->• <!--[endif]-->We assume that inclusion of Nigg as a potential O&M port refers to the Port of Nigg located in the Cromarty Firth, this port has not

been mentioned in other post-consent plans for the Culzean Pilot Project or during previous correspondence. As such, we highlight that there are several protected sites located in and near to both the Cromarty Firth and Moray Firth (i.e. the Cromarty Firth SPA, Moray Firth SPA and Moray Firth SAC). However, we note that section 9.2 states that for O&M activities the Platform Supply Vessel used to service existing Culzean oil and gas facilities will be used and no additional vessel is proposed. Based on this it is our understanding that there will be no significant increase in vessel trips between this port and the Culzean Floating Offshore Wind Turbine.

I trust this advice is of assistance.

Best wishes,

Clare

Clare McCarty (she/her) | **Marine Sustainability Adviser**

Correspondence address: NatureScot | Battleby House | Redgorton | Perth | PH1 3EW | **t:** 01738 458 614

Seòladh puist: NàdarAlba | Taigh Battleby | Ràth a' Ghoirtein | Peairt | PH1 3EW

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Northern Lighthouse Board



Northern Lighthouse Board

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Your Ref: Culzean FOWT Pilot Project – NSVMP
Our Ref: AL/OPS/ML/WIND_037_25

Ms Amy Woodward
Licensing Operations Team – Marine Directorate
Scottish Government
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28 April 2025

MARINE & COASTAL ACCESS ACT 2009

TotalEnergies E&P North Sea UK Ltd – Culzean FOWT Pilot Project – Navigational Safety Vessel Management Plan

Thank you for your e-mail correspondence dated 25th April 2025 relating to the Navigational safety Vessel Management Plan (NSVMP) submitted by **TotalEnergies E&P UK North Sea Ltd** to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (ML Number: MS-00010921).

Northern Lighthouse Board note the references within the document to the Lighting and Marking Plan (GB-CZT-00-TOTA-000002), across both Construction and Operations & Maintenance phases of the project. NLB also welcome Section 5 (Promulgation of Information).

NLB have no objection to the NSVMP document, and no recommendations for alterations.

Yours sincerely

[Redacted]

Peter Douglas
Navigation Manager

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To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notices/

Royal Yachting Association Scotland

From: [Pauline McGrow](#)
To: [MD Marine Renewables](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 23 May 2025
Date: 09 May 2025 11:42:06
Attachments: [image002.png](#)
[image003.png](#)

Hi Amy,

RYA Scotland has no comments to make on the NSVMP.

Kind Regards

Pauline

Pauline McGrow
Senior Administrator

Royal Yachting Association Scotland
T: 07436 296765
E: [Redacted]



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Scottish Fishermen's Federation

Our Ref: OB- Culzean OWT NSVMP/0025/001

Your Ref: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 23 May 2025

E-mail: MD.MarineRenewables@gov.scot
23rd May 2025

Dear Amy Woodward /MD-LOT

Scottish Fishermen's Federation
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SFF Response to TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation

The Scottish Fishermen's Federation (SFF) on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association, we appreciate the opportunity to provide our comments and seek clarifications on the Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 for the Culzean floating offshore wind turbine pilot project in relation to Marine Licence 00010724 / 00010921 to ensure the plan adequately addresses the concerns of the fishing industry.

Mitigation Measures for ERRV During Helicopter Operations¹:

We seek clarification on the mitigation measures in place when the dedicated Emergency Response and Rescue Vessel (ERRV) is engaged in close stand-by cover for Culzean or Ailsa installations, particularly during helicopter crew change operations. During these periods, the ERRV's primary role is to provide immediate emergency response in the event of a helicopter incident, which may reduce its capacity to monitor the Wind Turbine Generator (WTG) safety zone effectively. Given that bridge crews have specific responsibilities during helicopter operations, assigning additional duties such as monitoring the WTG safety zone could compromise their ability to respond effectively to aviation emergencies. We are therefore interested in understanding what risk assessments have been undertaken for such scenarios and what mitigation measures are in place to ensure continuous monitoring of the WTG safety zone during these times.

¹ Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 4.3 Guard Vessels page 18; Section 4.5 RAM Operations page 18-19; Section 7.2 Operation and Maintenance Phase page 26-27

Members:

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

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Additionally, we request clarification on the procedures in place during periods of inclement weather, when the ERRV may be off-station or unable to maintain position. Specifically, how are these contingencies communicated to marine users, including the fishing industry.

Although current fishing activity in the area is not high, this may change due to increasing spatial pressures on the fishing fleet. Displacement of fishing effort into previously unfished areas is a growing concern. We therefore also seek information on how the project intends to address potential displacement of fishing activities and how this will be monitored and mitigated over the operational life of the project.

We respectfully request that these clarifications be incorporated into an updated version of the NSVMP or provided as a supplementary note to ensure transparency, navigational safety.

Promulgation of Information²:

The issuance of Local Notices to Mariners (LNTM) and Kingfisher bulletins is crucial for keeping the fishing community informed. We seek assurance that these communications will be timely and effective, and request details on the protocols for real-time updates. In addition to the standard 14-day notice period prior to the commencement of marine activities, we request that a reminder notice be issued one week (7 days) prior to the start of operations. This additional communication will help ensure that fishers have up-to-date awareness and can take appropriate measures to avoid potential conflicts or disruptions.

Vessel Specifications, Movements, and Tow Operations³:

Detailed specifications and movements of vessels involved in the project are noted. The wind turbine generator and floater components for the Culzean floating wind turbine will be transported from their manufacturing site in Volos, Greece, to a marshalling yard for assembly. The completed turbine will then be towed to the Culzean site for installation, using a lead tow vessel and a backup tow vessel⁴. We recommend deploying chase vessels during the towing phase from port to site to inform fishermen of the navigational hazards and ensure safe operations. This practice is commonly utilized during tow bundle operations and seismic activities, providing an effective means of communication and safety management.

Closest Point of Approach (CPA) and Safety Zone Interpretation

The SFF note the wording in Section 4.5 RAM Operations which states:

“When an unauthorised vessel is detected to have a CPA (closest point of approach) within 0.5nm of the 500m zone, the designated on-site ERRV will make contact using standard marine procedures to inform the vessel it has, or is close to, infringing the safety zone. The vessel will be warned to increase their passing distance and instructed against entering in the future”⁵.

We wish to clarify that the statutory safety zone around the Culzean Floating Wind Turbine is 500 metres, as per the Marine Licence and relevant legislation. The reference to a 0.5 nautical mile CPA buffer (equivalent to approximately 926 metres) should not be interpreted or applied as a de facto 1 km exclusion zone.

² Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 5 Promulgation of Information page 20-24

³ Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 8 Vessel Types and Specifications page 27-31; Section 8.2.2 Floating Wind Turbine (WTG) installation page 28, Section 9 Number and Movements of Vessels page 32-33

⁴ Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 8.2.2 Floating Wind Turbine (WTG) installation page 28, Table 8-2 Tow Vessel Key Details

⁵ Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 4.5 RAM Operations page 19

We object to any implication or operational practice that would extend the exclusion zone beyond the legally defined 500 metres. Fishing vessels operating lawfully outside this zone must not be subject to unwarranted warnings or restrictions. The use of a 0.5 nm CPA threshold for ERRV engagement must be clearly defined as a monitoring precaution, not a boundary for exclusion or enforcement.

The SFF requests that this section of the NSVMP be revised to:

- Clearly reaffirm the 500 m safety zone as the only exclusionary boundary.
- Specify that ERRV contact within 0.5 nm is for situational awareness only, not enforcement.

This clarification is essential to avoid misinterpretation and to ensure fair and lawful access to fishing grounds.

Admiralty Notices to Mariners

The SFF notes the statement in Section 5.2 Admiralty Notices to Mariners which states:

“It is the responsibility of mariners to look up the Weekly Editions of Admiralty NtM, found on the UKHO website, and to make necessary corrections to the charts on board their vessel⁶.”

While we acknowledge that mariners have a legal obligation to maintain up-to-date navigational charts, we are concerned that this wording places disproportionate emphasis on individual mariners, particularly on small-scale fishers without recognising the developer’s parallel responsibility to ensure timely, accessible, and effective communication of navigational risks.

Many fishing vessels, especially those under 24 metres in length, operate under the Code of Practice for the Safety of Small Fishing Vessels of less than 15m Length Overall⁷, or the draft Code of Practice for Fishing Vessels of 24m and Over⁸. These Codes require that vessels carry nautical charts that are of the latest available edition and adequately corrected, but they do not impose the same administrative or technological requirements as those applied to larger commercial vessels.

Additionally, the UK Hydrographic Office (UKHO) has announced that paper nautical charts will be phased out by 2028–2030, with a transition to electronic navigation systems. This shift is supported by guidance such as⁹:

MGN 293 (M+F) – Alternative arrangements for meeting paper chart carriage requirements on vessels under 24m.

MGN 319 (M+F) – Acceptance of electronic chart plotting systems for fishing vessels under 24m and small commercial vessels.

Given the operational constraints faced by many inshore and small-scale fishers who may lack access to digital tools, administrative support, or real-time updates, we request that this section be revised to reflect a shared responsibility model, whereby:

⁶ Navigational Safety and Vessel Management Plan (NSVMP) GB-CZT-00-TOTA-000008 Section 5.2 Admiralty Notices to Mariners page 22

⁷ <https://www.gov.uk/government/publications/the-code-of-practice-for-the-safety-of-small-fishing-vessels-of-less-than-15m-length-overall/the-code-of-practice-for-the-safety-of-small-fishing-vessels-of-less-than-15m-length-overall>

⁸ https://assets.publishing.service.gov.uk/media/5a75c0c4ed915d506ee8138e/Annex_G_Draft_24m_and_Over_Fishing_Vessel_Code.pdf

⁹ <https://www.gov.uk/government/publications/the-code-of-practice-for-the-safety-of-small-fishing-vessels-of-less-than-15m-length-overall/the-code-of-practice-for-the-safety-of-small-fishing-vessels-of-less-than-15m-length-overall>, section 9.7 Nautical Publications

- The developer ensures that all relevant navigational information is submitted promptly to the UKHO in accordance with licensing conditions;
- Key updates are communicated directly to fishing organisations and local mariners through accessible and appropriate channels, such as Kingfisher bulletins, Local Notices to Mariners (LNtMs), and direct email alerts, at least 14 days in advance of any activity;
- A summary of relevant Admiralty Notices to Mariners affecting the project area is included in regular project communications, particularly during periods of active construction, maintenance, or changes to navigational status.

This approach would help ensure that all marine users, including the fishing community, are adequately informed and not exposed to unnecessary risk due to procedural or communication gaps.

For and on behalf of the Scottish Fishermen's Federation

[Redacted]

Oliwia Biros
Offshore Consents Assessments Manager
Scottish Fishermen's Federation

Consultation Responses – July 2025

Maritime and Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [Nick Salter](#); [Vinu John](#); [Vaughan Jackson](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 29 July 2025
Date: 24 July 2025 10:35:42
Attachments: [image002.png](#)
[image003.png](#)
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Good morning, Toni-Marie.

Thank you for the opportunity to comment on version 2 of the Navigation Safety and Vessel Management Plan (NSVMP) for the Culzean Floating Offshore Wind Turbine Pilot Project. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents received. We would like to comment as follows:

The NSVMP has been prepared to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (marine licence number MS-00010921) as summarised in table 1.1. We note that this is version 2 and includes updates as per the changelog at the beginning of the document.

We acknowledge that the plans are effectively 'live documents' and will be updated throughout the lifetime of the project with relevant information as stated in section 1.6. The project did state that they will consult MD-LOT where any updates are required and we are encouraged to see that this has been acted upon for this version. This is welcomed by the MCA and we will be available for comment on further changes to the NSVMP in due course.

We can confirm that the MCA are content with the provided updated NSVMP have no further comment at this stage.

If you have any questions regarding this response, then please do get in touch.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation



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Coastguard
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Maritime & Coastguard Agency

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NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [MARINEENERGY](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 29 July 2025
Date: 25 July 2025 13:25:38
Attachments: [image001.png](#)

Dear Toni-Marie,

Thank you for requesting our advice on the on the revised Navigational Safety Vessel Management Plan (NSVMP) for the Culzean Floating Offshore Wind Turbine Pilot Project (Document Reference: GB-CZT-00-TOTA-000008; Rev.002).

We note the revisions made in this version of the NSVMP (as summarised in the detailed change log on page 3) and have no substantive comments to make.

I trust this is of assistance.

Kind regards,

Clare McCarty (she/her) | **Marine Sustainability Adviser**

Correspondence address: NatureScot | Battleby House | Redgorton | Perth | PH1 3EW | **t:** 01738 458 614

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Northern Lighthouse Board



Northern Lighthouse Board

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Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: Culzean FOWT Pilot Project – NSVMP (V2)
Our Ref: AL/OPS/ML/WIND_057_25

Ms Toni-Marie Woodward
Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
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24 July 2025

MARINE & COASTAL ACCESS ACT 2009

TotalEnergies E&P North Sea UK Ltd – Culzean FOWT Pilot Project – Navigational Safety Vessel Management Plan (NSVMP (v2))

Thank you for your e-mail correspondence dated 25th April 2025 relating to Version 2 of the Navigational Safety Vessel Management Plan (NSVMP) submitted by **TotalEnergies E&P UK North Sea Ltd** to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (ML Number: MS-00010921).

Northern Lighthouse Board note the amendments made, and have no objection to the NSVMP document, and no recommendations for alterations.

Yours sincerely

[Redacted]

Peter Douglas
Navigation Manager

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In Salutem Omnium
For the Safety of All

Royal Yachting Association Scotland

From: [Pauline McGrow](#)
To: [MD Marine Renewables](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety Vessel Management Plan (NSVMP) - Consultation - Response Required by 29 July 2025
Date: 28 July 2025 10:15:14
Attachments: [image002.png](#)
[image003.png](#)

Hi Toni-Marie,

I write to inform you that RYA Scotland has no objections to this consultation.

Kind Regards

Pauline

Pauline McGrow
Business Support Lead

Royal Yachting Association Scotland
T: 07436 296765
E: [Redacted]



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Scottish Fishermen's Federation

Our Ref: OB- Culzean OWT NSVMP/0025/002

Your Ref: TotalEnergies E&P North Sea UK Limited - Post Consent Plans -
Navigational Safety Vessel Management Plan (NSVMP) - Consultation -
Response Required by 29 July 2025

E-mail: MD.MarineRenewables@gov.scot
30th July 2025

Dear Toni-Marie McGinn/MD-LOT

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SFF Response to TotalEnergies E&P North Sea UK Limited - Post Consent Plans – Revised Navigational Safety Vessel Management Plan (NSVMP) v2 - Consultation

The Scottish Fishermen's Federation (SFF) on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association, we appreciate the opportunity to review the updated Navigational Safety and Vessel Management Plan (NSVMP) Version 2 for the Culzean Floating Offshore Wind Turbine Pilot Project in relation to Marine Licence 00010921 to ensure the plan adequately addresses the concerns of the fishing industry. We appreciate the incorporation of several key stakeholder comments, particularly those related to ERRV roles, vessel specifications, and safety zone monitoring.

However, following a detailed review, we respectfully submit the following outstanding points for further clarification or revision to ensure the NSVMP fully reflects stakeholder concerns and maintains the highest standards of navigational safety and transparency:

1. ERRV Availability During Helicopter Operations and Adverse Weather

We note that the NSVMP does not address our request for clarification on how the ERRV will maintain effective monitoring of the Wind Turbine Generator (WTG) safety zone during helicopter operations or periods of inclement weather. Given the ERRV's critical role in aviation emergency response, we request:

- A summary of risk assessments undertaken for these scenarios;
- Mitigation measures to ensure continuous monitoring of the WTG safety zone;
- Communication protocols to inform marine users, including the fishing industry, when the ERRV is off-station or unavailable.

2. Fishing Activity Displacement and Monitoring

The NSVMP does not currently address the potential for displacement of fishing activity due to increasing spatial pressures. We request that the plan:

- Acknowledge the potential for future fishing activity in the area;

Members:

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

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- Outline how displacement will be monitored over the operational life of the project;
- Describe any mitigation or engagement strategies to support affected fishers.

3. CPA Threshold and Safety Zone Interpretation

While Section 4.5 has been updated, it does not explicitly reaffirm that the 500m safety zone is the only legally enforceable boundary. We request that the NSVMP be revised to:

- Clearly state that the 500m zone is the statutory exclusion zone;
- Clarify that the 0.5nm CPA threshold is used solely for situational awareness and not enforcement;
- Ensure that lawful fishing activity outside the 500m zone is not subject to unwarranted warnings.

4. Promulgation of Information – Reminder Notices

We appreciate the commitment to 14-day advance notices. However, our request for a 7-day reminder notice prior to the commencement of marine activities has not been addressed. We recommend this be included to enhance real-time awareness among fishers.

5. Tow Operations – Use of Chase Vessels

The NSVMP does not include provisions for chase vessels during the tow of the floating turbine. We strongly recommend their deployment to:

- Alert fishing vessels of the tow route and associated hazards;
- Enhance communication and safety during this critical operation phase.

6. Admiralty Notices to Mariners – Shared Responsibility

We acknowledge the removal of the sentence placing sole responsibility on mariners. However, we request that the NSVMP be further revised to reflect a shared responsibility model, including:

- A commitment to timely submission of navigational updates to UKHO;
- Direct communication of key updates to fishing organisations and local mariners;
- Inclusion of relevant Admiralty NtM summaries in project communications during active phases.

We trust these recommendations will be considered in the next revision of the NSVMP or addressed through a supplementary note. We remain committed to constructive engagement and ensuring that the Culzean Floating Wind project proceeds with full regard for navigational safety and the interests of the fishing community.

For and on behalf of the Scottish Fishermen's Federation

Oliwia Biros
Offshore Consents Assessments Manager
Scottish Fishermen's Federation

Consultation Responses – September 2025

Maritime and Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [Nick Salter](#); [Vinu John](#); [Vaughan Jackson](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety and Vessel Management Plan (NSVMP) - Consultation - Response Required by 25 September 2025
Date: 18 September 2025 14:29:32
Attachments: [image002.png](#)
[image003.png](#)
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[image007.png](#)
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Good afternoon, Amy.

Thank you for the opportunity to comment on revision 3 of the Navigation Safety and Vessel Management Plan (NSVMP) for the Culzean Floating Offshore Wind Turbine Pilot Project. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents received. We would like to comment as follows:

The NSVMP has been prepared to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (marine licence number MS-00011197) as summarised in table 1.1. We note that this is version 3 and includes updates as per the changelog at the beginning of the document.

We acknowledge that the plans are effectively 'live documents' and will be updated throughout the lifetime of the project with relevant information as stated in section 1.6. This is welcomed by the MCA and we will be available for comment on further changes to the NSVMP in due course.

We can confirm that the MCA are content with the provided updated NSVMP on this occasion and have no further comment at this stage.

If you have any questions regarding this response, then please do get in touch.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation



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Coastguard
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www.gov.uk/mca

NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [MARINEENERGY](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety and Vessel Management Plan (NSVMP) - Consultation - Response Required by 25 September 2025
Date: 24 September 2025 16:44:24
Attachments: [image001.png](#)

Dear Amy,

Thank you for consulting us on the revised Navigational Safety and Vessel Management Plan (NSVMP) for the Culzean Floating Wind Pilot Project (document reference: GB-CZT-00-TOTA-000008, revision: 03, dated: 15/09/2025).

We have reviewed the change log provided on pages 3 – 4 of the revised NSVMP and have no further substantive comments to make on this version.

As recommended in our replies regarding the revised PEMP and CaP we would find tracked-changes versions useful in assisting our review of any further revisions to the Culzean post consent plans, if possible.

Kind regards,

Clare

Clare McCarty (she/her) | **Marine Sustainability Adviser**

Correspondence address: [NatureScot](#) | [Battleby House](#) | [Redgorton](#) | [Perth](#) | [PH1 3EW](#) | **t:** 01738 458 614

Seòladh puist: [NàdarAlba](#) | [Taigh Battleby](#) | [Ràth a' Ghoirtein](#) | [Peairt](#) | [PH1 3EW](#)

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Northern Lighthouse Board



Northern Lighthouse Board

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Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: Culzean FOWT Pilot Project – NSVMP (Rev 3)
Our Ref: AL/OPS/ML/WIND_068_25

Ms Amy Woodward
Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

19 September 2025

MARINE & COASTAL ACCESS ACT 2009

TotalEnergies E&P North Sea UK Ltd – Culzean FOWT Pilot Project – Navigational Safety Vessel Management Plan (NSVMP (Rev 3))

Thank you for your e-mail correspondence dated 18th September 2025 relating to Revision 3 of the Navigational Safety Vessel Management Plan (NSVMP) submitted by **TotalEnergies E&P UK North Sea Ltd** to satisfy the requirements of condition 3.2.8 and 3.2.10 of the marine licence (ML Number: MS-00010921).

Northern Lighthouse Board note the amendments made, and have no objection to the NSVMP document, and no recommendations for alterations.

Yours sincerely

Peter Douglas
Navigation Manager

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In Salutem Omnium
For the Safety of All

Royal Yachting Association Scotland

From: [Pauline McGrow](#)
To: [MD Marine Renewables](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety and Vessel Management Plan (NSVMP) - Consultation - Response Required by 25 September 2025
Date: 24 September 2025 13:50:35
Attachments: [image002.png](#)
[image003.png](#)

Hi Amy,

Many thanks for your email. I write to inform you that RYA Scotland has no comment that they wish to make on this consultation.

Kind Regards

Pauline

Pauline McGrow
Business Support Lead

Royal Yachting Association Scotland
T: 07436 296765
E: [Redacted]



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Scottish Fishermen's Federation

From: [Oliwia Biros](#)
To: [MD Marine Renewables](#)
Cc: [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [Mohammad Fahim Hashimi](#)
Subject: Re: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Navigational Safety and Vessel Management Plan (NSVMP) - Consultation - Response Required by 25 September 2025
Date: 25 September 2025 14:07:18
Attachments: [image001.png](#)
[Outlook- Users_alj](#)

Hi Amy,

Thank you for the opportunity to participate in the statutory consultation regarding the Revised Navigational Safety and Vessel Management Plan (NSVMP) submitted by TotalEnergies E&P North Sea UK Limited. After reviewing the materials provided, we have no comments or suggestions to offer at this time.

Please consider this as a formal nil response from the SFF.

Regards,
Oliwia

Oliwia Biros

Offshore Consents Assessments Manager

Scottish Fishermen's Federation

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