

MachairWind Offshore Windfarm

Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan



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Glossary of Acronyms

Abbreviation	Definition
ADR	Alternative Dispute Resolution
ANIFPO	Anglo Northern Ireland Fish Producers Organisation
CaP	Cable Plan
CBRA	Cable Burial Risk Assessment
CFA	Clyde Fishermen's Association
CFLO	Company Fisheries Liaison Officer
CFWG	Commercial Fisheries Working Group
CIFA	Communities Inshore Fisheries Alliance
CMS	Construction Method Statement
CoP	Construction Programme
COLREGs	Convention on the International Regulations for Preventing Collisions at Sea
DoL	Depth of Lowering
DSLPP	Development Specification and Layout Plan
ECC	Offshore Export Cable Corridor
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
EIAR	Offshore Environmental Impact Assessment Report
EMP	Environmental Management Plan
ERCoP	Emergency Response and Cooperation Plan
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables
FIR	Fishing Industry Representative
FLO	Fisheries Liaison Officer
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FU	Functional Unit (Nephrops functional unit)
GIS	Geographic Information System
GPS	Global Positioning System
GW	Gigawatt
IACs	Inter-array Cables
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
ICES	International Council for the Exploration of the Seas
IMO	International Maritime Organization
INNSMP	Invasive Non-Native Species Management Plan
KIS-ORCA	Kingfisher Information Service – Offshore Renewable & Cable Awareness



Abbreviation	Definition
LMP	Lighting and Marking Plan
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MNWFA	Mallaig and North West Fishermen's Association
MPCP	Marine Pollution Contingency Plan
MW	Megawatt
NIFPO	Northern Ireland Fish Producers' Organisation
NLB	Northern Lighthouse Board
NSP	Navigational Safety Plan
NtM	Notice to Mariners
OAA	Option Agreement Area
OFLO	Offshore Fisheries Liaison Officers
O&M	Operation and Maintenance
OnTDA	Onshore Transmission Development Area
OSP	Offshore Substation Platform
REM	Remote Electronic Monitoring
RIFG	Regional Inshore Fisheries Group
SAR	Search and Rescue
SCFF	Scottish Creel Fishermen's Federation
SFF	Scottish Fishermen's Federation
SOLAS	International Convention for the Safety of Life at Sea
SOP	Standard Operating Procedure
SPFA	Scottish Pelagic Fishermen's Association
SPR	ScottishPower Renewables
SWCRIFG	South West Coast Regional Inshore Fisheries Group
SWFPA	Scottish White Fish Producers Association
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
VHF	Very High Frequency
VMP	Vessel Management Plan
VMNSP	Vessel Management and Navigational Safety Plan



Abbreviation	Definition
VMS	Vessel Monitoring System
WDA	Windfarm Development Area
WNoO	Weekly Notice of Operations
WTG	Wind Turbine Generator
s.36	Section 36 (Electricity Act 1989 consent)



Glossary of Terms

Term	Definition
Cable protection	Protective measure to minimise the effects of scour and hazards along the offshore cables (e.g. to prevent cable exposure or snagging of vessel anchors or fishing gear), as well as for protecting these cables at infrastructure crossing points.
Creel	Creel is typically a Scottish term for a pot or trap deployed by an inshore vessel. These are generally rigid structures which fish or shellfish are guided or enticed into through funnels that make entry easy but escape difficult. There are many designs which are created to suit the behaviour of its target species.
Demersal	Living on or near the seabed.
Development Area	Application boundary for consenting purposes which, for the Project, consists of a Windfarm Development Area, Offshore Export Cable Corridor, and Onshore Transmission Development Area. Separate consent and marine licence applications will be submitted for each Development Area where applicable.
Embedded mitigation measure	Mitigation measures, including industry good practice measures, that are directly incorporated into the design for the MachairWind Windfarm Development Area to avoid or reduce environmental effects.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment (EIA) Regulations	A collective term referring to The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.
Fish Stock	Any natural population of fish made up of an isolated and self-perpetuating group of the same species.
Fishery	A group of vessel voyages which target the same species or use the same gear.
Fishing ground	An area of water or seabed targeted by fishing activity.
Fleet	A physical group of vessels sharing similar characteristics (e.g. nationality).
Functional unit	A Nephrops functional unit (FU) is a geographic area used for managing and reporting on Nephrops populations.
Gear type	The method/equipment used for fishing.
Inter-array cables (IACs)	Armoured cable containing electrical and fibre optic cores which link the wind turbine generators to each other and to the offshore substation platform(s).
International Council for the Exploration of the Seas (ICES) statistical rectangles	The International Council for the Exploration of the Seas (ICES) standardise the division of sea areas to enable statistical analysis of data. Each ICES statistical rectangle is 30 min latitude by 1 degree longitude in size (approximately 30 x 30 nautical miles). A number of rectangles are amalgamated to create ICES statistical areas.
Landfall	The area from Mean Low Water Springs to a transition bay(s), where the offshore export cable(s) come ashore.
Landings	Quantitative description of the amount of fish returned to port for sale, in terms of value or weight.
MachairWind Offshore Windfarm	An offshore windfarm capable of exporting around 2 GW of renewable energy to the National Electricity Transmission System. MachairWind Offshore Windfarm comprises three Development Areas: <ul style="list-style-type: none"> The WDA – located on the west coast of Scotland to the northwest of Islay and west of Colonsay;



Term	Definition
	<ul style="list-style-type: none"> The Offshore Export Cable Corridor – a preliminary boundary extending from the WDA to mean high water springs at a landfall location near Girvan, South Ayrshire; and The Onshore Transmission Development Area – a preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. <p>Separate consent and licence applications will be submitted for each Development Area.</p>
Mean High Water Springs (MHWS)	The average, over a year, of the heights of two successive high waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Mean Low Water Springs (MLWS)	The average, over a year, of the heights of two successive low waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Mean sea level	The average level of the sea taking account of all tidal effects but excluding surge events.
Minimum conservation reference size	For the protection and conservation of fisheries resources, minimum conservation reference sizes are applied to certain species of fish and shellfish. The minimum conservation reference size is the size of a living marine aquatic species below which restrictions or incentives apply that aim to avoid capture through fishing activity.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore windfarms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
Offshore cables	The collective term for all offshore cables i.e. IACs, offshore substation platform link cables, offshore export cables and associated fibre optic cables.
Offshore export cable	Armoured cable containing electrical cores between the offshore substation platform(s) and landfall. Offshore export cables will include bundled fibre optic cables. The offshore export cables are subject to Marine Licence applications under the Marine (Scotland) Act 2010. The portion of the offshore export cable(s) located within the WDA is assessed as part of this MachairWind WDA EIA and a marine licence application to construct, alter or improve this portion has been submitted alongside the WDA application. A separate marine licence application will be submitted for the portion of the offshore export cable(s) from the WDA boundary to mean high water Mean High Water Springs.
Offshore export cable corridor (ECC)	The preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located. A separate marine licence application will be submitted for the offshore export cable(s) located within the Offshore ECC.
Offshore Substation Platform (OSP)	An offshore platform with a fixed foundation located within the WDA which houses electrical equipment such as transformers, switchgear, protection and control systems, and enables the windfarm's renewable electricity to be collected via inter-array cables and exported to the National Electricity Transmission System via offshore export cables.
Offshore Substation Platform (OSP) link cables	Electrical cables which link OSPs (if more than one OSP is required). These cables will include fibre optic cores or bundled fibre optic cables. OSP link cables will be wholly located within the WDA.
Onshore Transmission Development Area (OnTDA)	The preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. This Transmission Owner is responsible for consenting the high voltage direct current switching station. Onward connections to the National Electricity Transmission System will be consented by National Grid Electricity Transmission and ScottishPower Transmission. Where relevant, these are considered as part of cumulative effects assessment in the EIA.



Term	Definition
Operational life	The operational life is the expected length of time from final commissioning of the WDA until the cessation of commercial operations. This is anticipated to be 35 years.
Option Agreement Area (OAA)	The seabed area awarded to ScottishPower Renewables in January 2022 through the ScotWind leasing round.
Otter trawl	A net with large rectangular boards (otter boards) which are used to keep the mouth of the trawl net open. Otter boards are made of timber or steel and are positioned in such a way that the hydrodynamic forces, acting on them when the net is towed along the seabed, pushes them outwards and prevents the mouth of the net from closing.
Pelagic	Of or relating to the open sea.
Pelagic trawl	A net used to target fish species in the mid water column.
Potting	Pots (which may be referred to as creels) are generally rigid structures into which fish or shellfish are guided or enticed through funnels that make entry easy but from which escape is difficult. There are many different styles and designs, each one has been designed to suit the behaviour of its target species.
Pre-construction works	Pre-construction works are activities undertaken prior to formal commencement of construction. Examples include survey works such as geotechnical and geophysical surveys and seabed preparation activities.
Quota	A proportion of the total allowable catch for a fish stock.
Recruitment	Recruitment can be defined as the number of fish surviving to enter the fishery or to some life history stage such as settlement or maturity.
Safety zones	An area of water around or adjacent to a wind turbine generator or Offshore Substation Platform and associated substructure which is to be constructed, extended, operated or decommissioned, from which certain or all classes of vessels are excluded and within which activities can be regulated for the purpose of securing safety of the wind turbine generator, substructure or vessels in that vicinity, and individuals on both the wind turbine generator, substructure or vessel, in line with Section 95 of the Energy Act 2004.
Scallop dredge	A method to catch scallop using steel dredges with a leading bar fitted with a set of spring-loaded, downward pointing teeth. The teeth on the bar at the front of the dredge are approximately 120 mm in length, but typically only the front 20 mm penetrate the seabed to dislodge scallops from the sand. Behind this toothed bar (sword), a mat of steel rings is fitted. A heavy net cover (back) is laced to the frame, sides and to the after end of the mat to form a bag.
Scottish Marine Area	The area of Scotland's territorial sea limit (up to 12 nautical miles from baseline) as defined in the Marine (Scotland) Act 2010.
ScotWind	A Crown Estate Scotland seabed leasing round which enabled developers to propose offshore wind projects and apply for seabed rights to plan and build windfarms in Scottish waters.
Scour protection	Protective measures to avoid sediment being eroded away from the base of the wind turbine generator foundations as a result of the flow of water.
Shellfish species	Aquatic invertebrates with a hard outer covering, either a shell or a shell-like exoskeleton, that are commonly eaten as food.
The Applicant	The legal entity submitting consent applications for the MachairWind Offshore Windfarm, namely MachairWind Limited.
The Lighthouse	The Dubh Artach lighthouse.



Term	Definition
The Project	MachairWind Offshore Windfarm including all its Development Areas and associated infrastructure.
Total allowable catch	Total allowable catches are catch limits, expressed in tonnes or numbers, that are set for some commercial fish stocks.
Vessel Monitoring System (VMS)	A system used in commercial fishing to allow environmental and fisheries regulatory organisations to monitor, minimally, the position, time at a position, and course and speed of fishing vessels.
Vivier	Vivier crabbers are generally larger vessels with the ability to retain large numbers of live crab onboard in storage tanks.
Windfarm Development Area (WDA)	The application boundary within the OAA where consent will be sought for the proposed WDA infrastructure. The WDA infrastructure is subject to Section 36 consent and marine licence applications (generation and transmission) which are being applied for separately from the Offshore ECC infrastructure and OnTDA infrastructure.
WDA infrastructure	The offshore generation and transmission infrastructure located within the WDA including but not limited to: WTGs, WTG fixed foundations (and associated scour protection), OSP(s), OSP fixed foundations (and associated scour protection), IACs, OSP link and offshore export cable(s) and their associated external cable protection (insofar as these are located within the WDA) and fibre optic cables.
Wind Turbine Generator (WTG)	A wind turbine generator which converts wind energy into electrical energy. Each wind turbine generator is a complex system composed of a high number of components. Typically, the main components include the rotor assembly (composed of three blades and a hub); the nacelle (containing a generator, shaft and gearbox, power electronic converter and transformer); and the tower (containing lifting equipment and the switchgear).

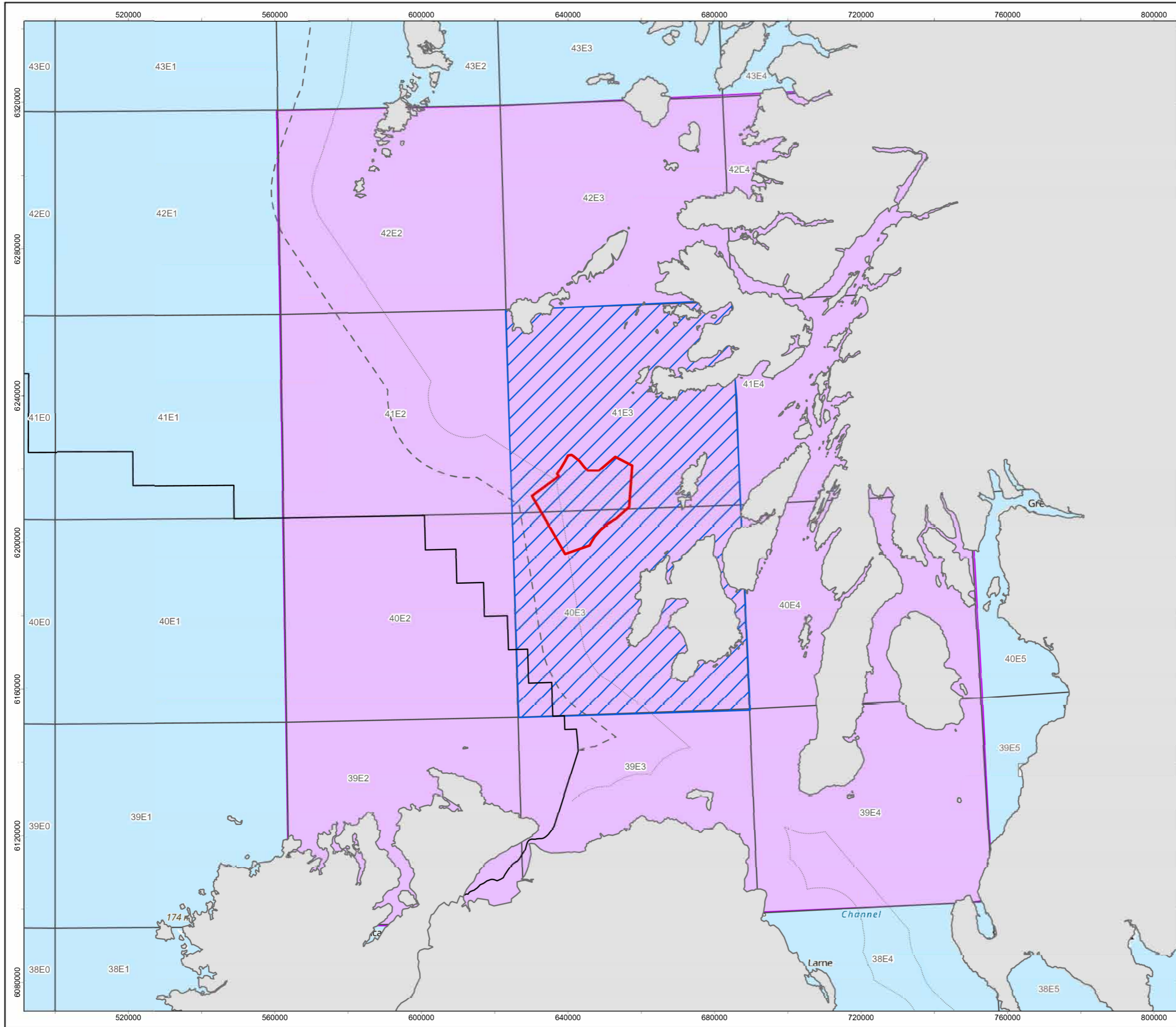


1 INTRODUCTION

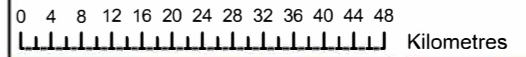
1.1 OVERVIEW OF THE PROJECT

1. MachairWind Limited (the Applicant) is intending to develop the proposed MachairWind Project (the Project). The Project consists of the Windfarm Development Area (WDA) including all permanent and temporary works areas, as well as offshore substation platform(s) (OSPs), inter-array cables (IACs), wind turbine generators (WTG) with fixed foundations, and the portion of the export cable within the WDA. The Project will include up to 144 WTGs, all located within the WDA.
2. The Offshore Export Cable Corridor (ECC), which includes the export cable from the WDA to landfall, is not included as part of this Fisheries Mitigation, Monitoring and Communication Plan (FMMCP). The Offshore ECC will be provided for in a separate FMMCP that will be prepared as part of the ECC consent application which will be submitted in due course.
3. The Project is situated off the northwest of Islay and west of Colonsay and the WDA is approximately 448 km² in size. A portion of the WDA of approximately 51 km² is classified as a restricted build area due to environmental and engineering constraints; proposed WTGs will be located within the remaining 397 km².
4. The location and extent of the Project, together with the Commercial Fisheries Study Areas used for the Environmental Impact Assessment (EIA) are presented in **Figure 1.1**.
5. The Project infrastructure of relevance to this FMMCP includes the following:
 - Up to 144 WTGs with fixed foundations;
 - Up to 2 OSPs on fixed foundations;
 - Up to 572 km of IACs, which connect the WTGs to one another and then to the OSPs;
 - Up to 272 km OSP link cables which connect the OSPs to one another;
 - Up to 200 km of offshore export cable located within the MachairWind WDA, including up to 4 export cables;
 - Cable minimum Depth of Lowering (DoL) (i.e. the distance between mean seabed level and the top surface of the buried cable) will be between 0.3 and 3.0 m for IACs and 1.0 and 3.0 for OSP link and offshore export cables. DoLs of 0.3 m may be used for inter-array cables (IACs) in challenging ground conditions such as shallow outcropping rock, due to the inherent protection it provides the cable at a shallower DoL. However where practicable, the Applicant will seek to achieve DoLs of 1.0 m to 2.0 m for all offshore cable types in seabed substrates consisting of granular material or soft clay; and
 - Scour and cable protection where required.
6. The offshore construction period is estimated to be five-years, and the Project will have an operational lifetime of approximately 35 years.





- Windfarm Development Area
- Local Study Area
- Regional Study Area
- ICES Statistical Rectangles
- 12 NM Territorial Sea Boundary
- UK-Ireland EEZ
- 6 nm Boundary



1	12/11/2025	FN	SM	CC	CG
REV	REV DATE	GIS CREATOR	GIS REVIEWER	TECHNICAL CHECKER	TECHNICAL APPROVER

DRAWING NUMBER MCW-DWF-ENV-MAP-RHS-000030

DATUM	ETRS89	PROJECTION	UTM Zone 29N
SCALE	1:1,000,000	PAGE SIZE	A3

PROJECT TITLE MachairWind

DRAWING TITLE **Figure 1.1:**
Commercial Fisheries Study Areas

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Service Layer Credits: World Topographic Map: Esri, UK, Esri, TomTom, Garmin, FAO, METINASA, USGS
World Ocean Base: OceanWise, Esri, GEBCO, Garmin, NaturalVue
World Ocean Reference: Esri, UK, Esri, TomTom, Garmin, FAO, NOAA, USGS

NOT TO BE USED FOR NAVIGATION



1.2 PURPOSE OF THIS DOCUMENT

7. This FMMCP describes the mitigation, monitoring and communication that will be put in place to avoid or minimise the adverse effects of the Project on commercial fisheries, including how the Applicant will liaise and co-exist with the commercial fishing industry. The FMMCP builds upon the commitments made in the WDA Environmental Impact Assessment Report (EIAR).
8. In support of this aim, the objectives of the FMMCP are as follows:
 - Set out mitigation measures relevant to the fishing industry and describe how these will be delivered;
 - Set out the approach to monitoring fisheries activity in response to the Project;
 - Describe the approach to fisheries liaison, identifying how communication between the Applicant and the fishing industry will take place and confirming liaison roles and responsibilities; and
 - Set out procedures to manage interactions between the Applicant and the fishing industry, including procedures relating to cooperation agreements and associated payments, for potential gear loss and gear relocation or removal.
9. This is a live, iterative document and will be reviewed and updated as the Project design is refined and as ongoing stakeholder consultation and feedback is received.
10. This FMMCP covers the construction and operational phases of the Project. A separate FMMCP will be prepared ahead of decommissioning in line with any conditions of the relevant Marine Licences and the Decommissioning Programme, that may be required at that time under the Energy Act 2004.

1.3 RELEVANT GUIDANCE

11. This FMMCP has been developed in accordance with the following guidance:
 - Marine licensing and consenting: offshore renewable energy projects, Mitigation and Monitoring Plans, Fisheries Mitigation, Monitoring and Communication Plan (hereafter referred to as the Marine Directorate Guidance) (Marine Directorate, 2025);
 - Offshore windfarms - monitoring impacts on the commercial fishing industry: good practice guidance (Scottish Government, 2025);
 - Fishing Liaison with Offshore Wind and Wet Renewables (FLOWW) Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments (FLOWW, 2025);
 - Scottish Government Assessing fisheries displacement by other licensed marine activities: good practice guidance (Marine Scotland Science, 2022);
 - Scottish Government National Marine Plan (Scottish Government, 2015); and
 - Collaborative Offshore Wind Research into the Environment (COWRIE) Options and Opportunities for Marine Fisheries Mitigation Associated with Windfarms (Blyth-Skyrme, 2010).
12. The Scottish Fishermen's Federation (SFF) and its affiliated Associations have withdrawn from the FLOWW process. No alternative SFF endorsed guidance is currently available. The Applicant will have regard to relevant FLOWW 2025 guidance, and the FMMCP is based on Project-specific procedures informed by relevant Scottish guidance (Marine Directorate, 2025 and Scottish Government, 2025), established industry good practice and stakeholder consultation. The Applicant will continue to work with the SFF and its affiliated Associations on the Project FMMCP, which sets out the Project's fisheries liaison, mitigation, monitoring and communication procedures.
13. In preparation of this FMMCP, other relevant guidance and proposals have also been considered, including Moray Firth and Forth and Tay Commercial Fisheries Working Groups (CFWG) Proposal for Consideration of Mobile Gear Disruption Payments for Construction Phase of Fixed Bottom Offshore Renewable Energy Installations (2024) and Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries (Draft) prepared by the United States Bureau of Ocean



Energy Management (2022). Engagement to date with fisheries stakeholders and fishers has also informed the development of this document. A summary of this engagement is detailed in Annex A.

1.4 CONSENTS AND LICENCES

14. The following consents and licences are required for the Project, which are expected to be conditioned to require preparation of and adherence to an approved FMMCP:

- Section 36 consent under the Electricity Act 1989 for generating stations with capacity of >50 Megawatts (MW) (out with 12 nautical miles) and >1 MW (within 12 nautical miles). This consent applies to the WTGs and WTG foundations located within the MachairWind WDA and any scour and cable protection associated with these assets; and
- Marine Licences under the Marine (Scotland) Act 2010 are required for construction or deposition in or over the sea, or on and under the seabed for the OSPs, IACs and OSP link cables, offshore export cable.

1.5 LINKAGES WITH OTHER CONSENT PLANS

15. This FMMCP sets out specific procedures relating to the mitigation of effects on commercial fisheries, the Applicant’s approach to monitoring and the approach to ongoing communication and liaison with the fishing industry. It will form part of a suite of documents that will provide the framework for the management of the construction and operation of the Project.

16. A summary of consistency and linkage of the FMMCP with other Consent Plans is provided in **Table 1.1**. The intention is not to duplicate the same information across several Consent Plans; hence linkages are identified here. Not all of the referenced Consent Plans will be submitted in full as part of the application; where included they may be provided in outline, with the final versions to be developed and issued post-consent in accordance with the relevant consent conditions.

Table 1.1 FMMCP consistency with and links to other Consents Plans and/or Outline Plans

Consent Plan	Consistency with and linkage to FMMCP
Development Specification and Layout Plan (DSLPL)	Sets out the final design and layout parameters associated with the Project.
Environmental Management Plan (EMP)	Sets out the environmental management framework for the construction and operation of the Project. Of relevance to the FMMCP, it confirms the role of the Fisheries Liaison Officer and sets out procedures for reporting of dropped objects and pollution response procedures.
Lighting and Marking Plan (LMP)	Provides details of lighting and marking of the Project during construction and operation. Of relevance to the FMMCP, it confirms how the Project will be marked and lit in terms of aiding safe marine navigation.
Cable Plan (CaP)	Provides details on cable specifications, routeing, installation method and protection. Of relevance to the FMMCP it confirms cable burial and protection details.
Navigational Safety Plan (NSP) and the Vessel Management Plan (VMP) (both forming part of the Vessel Management and Navigational Safety Plan (VMNSP)).	Provides details on the navigational safety measures to be employed during the construction and operation of the Project. Of relevance to the FMMCP, it describes project related vessel activity and how it will be managed, covering use of Safety Zones, promulgation of information to marine users, and a de-confliction notice.
Construction Programme (CoP), and the Construction Method Statement (CMS)	Provides details on the timing and sequencing of construction works and commissioning of the Project. Of relevance to the FMMCP, it confirms when offshore works in the WDA will commence and cease.



1.6 DOCUMENT STRUCTURE

17. This FMMCP has been structured as outlined in **Table 1.2** and as such reflects the requirements of the Marine Directorate Guidance.

Table 1.2 FMMCP document structure

Section	Summary of Content
Section 1: Introduction	Identifies the scope of the FMMCP and provides an overview of the Project.
Section 2: Fisheries Overview	Provides an overview of fishing activity in the Project, including a summary of the impacts on commercial fisheries and fish and shellfish stocks.
Section 3: Fisheries Mitigation	Sets out the Applicant's approach to mitigation, focused on enabling coexistence.
Section 4: Fisheries Monitoring	Sets out the Applicant's approach to monitoring fisheries activity in response to the Project.
Section 5: Communication	Sets out the Applicant's approach to communication with the fishing industry and other relevant stakeholders and describes communication roles and responsibilities.
Section 6: Status, review and update frequency	Explains how and when the FMMCP will be reviewed and updated post-consent to manage, mitigate and monitor the potential impacts of the Project on commercial fishing, subject to agreement with Marine Directorate – Licensing Operations Team (MD-LOT) following consultation with stakeholders.
Annex A: Summary of Stakeholder Engagement	Provides a summary of stakeholder engagement carried out in relation to the FMMCP.

2 FISHERIES OVERVIEW

2.1 FISHING ACTIVITY WITHIN THE WDA

18. This FMMCP has been informed by the data collected to inform the WDA EIA, together with subsequent engagement with commercial fisheries industry stakeholders.
19. Based on the information gathered, **Table 2.1** identifies the commercial fisheries receptors assessed in the EIAR.

Table 2.1 Commercial fisheries fleets / receptors assessed in the EIAR

Fishing Fleet	Target Species	Windfarm Development Area	Local and/or Regional Study Areas
UK Fishing Fleets			
Potting	Brown crab, lobster and other crab species including velvet and green	Predominant fishery in the WDA; moderate to high potting effort across much of the array area	Local: dominant métier and main contributor to landings value. Regional: widespread, major component of activity/value.
Potting	Nephrops or whelk or ballan wrasse	Present but more discrete/localised than crab/lobster potting	Local: present (including landings into local ports). Regional: present and locally important in places, but not the dominant regional driver compared with trawl/pelagic.



Fishing Fleet	Target Species	Windfarm Development Area	Local and/or Regional Study Areas
Demersal otter trawl (TR1 and TR2)	Nephrops and mixed demersal species and/or haddock and mixed demersal species	Negligible within the WDA	Local: activity mainly outside the WDA (generally east/south of WDA). Regional: important component of landings/effort (especially nephrops and mixed demersal).
Dredge	King scallop	Low within the WDA (minimal recorded overlap)	Local: some recorded activity immediately outside WDA in the northeast corner, surrounding the Dubh Artach lighthouse. Regional: present with higher activity north, east and south of the WDA (regional scallop grounds).
Commercial diving	King scallop or razor shell	Negligible within the WDA	Local: negligible within the WDA; diving tends to be very close inshore and coastal. Regional: present but localised and inshore.
Gear with hooks (including jigging, handline, rod and line)	Mackerel	Negligible within the WDA	Local: negligible across the WDA; typically inshore and coastal, and highly seasonal. Regional: limited and dispersed.
Set nets	Mixed demersal species	Negligible within the WDA	Local: small-scale activity around Islay, Colonsay and Mull, generally coastal and out with the WDA. Regional: limited overall.
Pelagic trawl	Sprat, mackerel, herring and blue whiting	Negligible within the WDA	Local: absent in WDA context. Regional: present seasonally in broader-scale offshore patterns; activity generally further offshore than the WDA to the west, with some activity to the south close inshore.
Non-UK Fishing Fleets			
Potting	Brown crab and lobster	Low/occasional use at most (not strongly dependent on the WDA)	Local: occasional presence (not a dominant fleet segment in the WDA/local context). Regional: Activity by Irish potting vessels noted at the Exclusive Economic Zone (EEZ) boundary between UK-Ireland.
Pelagic trawl	Sprat, mackerel, herring and blue whiting	Negligible within the WDA	Regional: present (non-UK pelagic fleets operate at broader/offshore scales; not focused in the WDA).



2.2 SUMMARY OF IMPACTS ON COMMERCIAL FISHERIES AND FISH AND SHELLFISH ECOLOGY

2.2.1 Fish and Shellfish Ecology

20. The fish and shellfish ecology assessment considered temporary physical disturbance, increased suspended sediment concentrations and sediment redeposition, underwater noise and vibration, introduction of marine invasive non-native species, and changes in fishing activity during construction, operation and maintenance, and decommissioning. During operation and maintenance, the assessment also considered permanent habitat loss, electro-magnetic fields and introduction of hard substrate.
21. For the purposes of this FMMCP, the key fish and shellfish receptors of relevance to commercial fisheries include shellfish species such as brown crab, lobster, Nephrops and king scallop, together with commercially important fish species present in the Local and Regional Study Areas including haddock, cod, herring, sprat, whiting, blue whiting and mackerel. The assessment also considered spawning and nursery grounds for relevant fish species.
22. Overall, the fish and shellfish ecology assessment concluded that effects of the WDA would be negligible to minor adverse and therefore not significant in EIA terms, both for the WDA alone and when considered with the offshore export cable corridor based on current information. No significant effects were identified for commercial fish or shellfish species. Cumulative effects were also assessed and were concluded to remain negligible to minor adverse and not significant in EIA terms.

2.2.2 Commercial Fisheries

23. The commercial fisheries assessment considered the following impacts during construction, operation and maintenance, and decommissioning: reduction in access to, or exclusion from, the WDA; displacement leading to gear conflict and/or increased fishing pressure; displacement or disruption of commercial resources; increased Project vessel traffic leading to interference; and gear snagging leading to loss of earnings.
24. The assessment identified that the principal commercial fisheries sensitivity within the WDA is associated with potting activity, particularly UK vessels targeting crab and lobster. Other fisheries receptors assessed included potting for Nephrops, whelk or ballan wrasse, demersal otter trawl for Nephrops and mixed demersal species including haddock, scallop dredging for king scallop, hooks for mackerel, and pelagic trawl fisheries for species including mackerel, sprat and herring. Within the WDA, demersal, dredge and pelagic activity is generally low or negligible compared with potting activity.
25. With embedded mitigation in place, the majority of commercial fisheries effects were assessed as negligible or minor adverse and therefore not significant in EIA terms. The only significant effects identified were during construction for UK potting fleets targeting crab and lobster, in relation to Impact 1 (reduction in access to, or exclusion from, the WDA) and Impact 2 (displacement leading to gear conflict and/or increased fishing pressure), both of which were assessed as moderate adverse prior to additional mitigation.
26. Additional mitigation in the form of disruption agreements delivered through this FMMCP is proposed for these construction-phase effects. With this additional mitigation, the residual effect for these receptors reduces to minor adverse. Overall, with implementation of this FMMCP, the assessment concluded that the residual effects of the WDA on commercial fisheries would be minor adverse or less and therefore not significant in EIA terms. Cumulative effects were also concluded to remain negligible to minor adverse and not significant in EIA terms.



2.3 FISHERIES STAKEHOLDERS AND ENGAGEMENT

27. The Applicant has undertaken consultation with fisheries stakeholders in relation to the Project since 2022. A summary of consultation undertaken prior to submission of the Application is provided in Section 12.4 within **Chapter 12 Commercial Fisheries** of the WDA EIAR and is not duplicated here.
28. The Applicant has engaged with the following fisheries stakeholders as part of the consultation process for the Project to date:
- Campbelltown Fisheries Office;
 - Clyde Fishermen’s Association (CFA);
 - Communities Inshore Fisheries Alliance (CIFA);
 - Mallaig and North West Fishermen’s Association (MNWFA);
 - Mull and Iona Fishermen’s Association (MIFA)
 - Scottish Fishermen’s Federation (SFF);
 - Scottish Pelagic Fishermen’s Association (SPFA);
 - Scottish White Fish Producers Association (SWFPA); and
 - South West Coast Regional Inshore Fisheries Group (SWCRIFG).
29. Engagement with local fishers has primarily been undertaken directly with the Applicant’s Company Fisheries Liaison Officer (CFLO)), Brown and May Marine Limited, who have been in post since 2022. The Applicant’s CFLO has made regular port visits to engage with fishers active in the WDA (2023, 2024, and 2025).
30. Engagement and liaison with the fishing industry is ongoing and will continue throughout the lifetime of the Project, including (but not limited to) communication via the CFLO, via the Commercial Fisheries Working Group (CFWG), Notice to Mariners (NtMs) and Weekly Notice of Operations (WNoO).

3 MITIGATION

3.1 OVERVIEW

31. It is the intention of the Applicant to facilitate coexistence wherever possible during the construction, operation and maintenance (O&M) and decommissioning phases of the Project, which will include the implementation of mitigation strategies to reduce the overall impacts of the Project on commercial fisheries.
32. This section of the document presents measures, in addition to fisheries liaison, that will be put in place by the Applicant to promote coexistence between the Project and the fishing industry.

3.2 PRINCIPLES OF MITIGATION

33. Mitigation and liaison will follow the hierarchy to avoid, minimise and/or mitigate impacts on commercial fishing throughout the Project lifecycle. The Applicant will:
- Implement embedded mitigation where practicable to minimise disruption;
 - Where Safety Zones are required, keep their extent and duration to the minimum necessary for safety and clearly communicate whether measures are statutory Safety Zones or advised safe working distances;
 - Ensure safe working practices and effective communications are maintained by all project vessels (including through the CFL)/ Fishing Industry Representative (FIR)/ Offshore Fisheries Liaison Officer (OFLO) and, where applicable, the Marine Coordination Centre);
 - Provide clear procedures for reporting and claiming for loss of/damage to fishing gear associated with project activities; and
 - Ensure timely dissemination of notifications and updates through appropriate channels.



34. The Applicant will seek to facilitate coexistence where reasonably practicable during the construction, O&M and decommissioning phases of the Project, recognising that coexistence cannot be assumed or guaranteed for all gear types. The extent to which fishing activity may continue within or adjacent to the WDA will depend on gear type, the location and nature of Project infrastructure and activities, and relevant safety and operational constraints. The FMMCP therefore recognises that there may be gear-specific constraints and uncertainties and does not present coexistence as an assured outcome. This approach is proportionate to the commercial fisheries baseline and the receptors identified through the EIA, which did not identify material overlap between the WDA and mobile gear activity within the WDA.

3.3 EMBEDDED MEASURES

35. As part of the design process, several embedded mitigation measures were provided within the WDA EIAR. Those embedded mitigation measures of relevance to commercial fishers are described in **Table 3.1**.

Table 3.1 Embedded mitigation measures relevant to commercial fisheries

ID	Parameter	Description of Mitigation Measure	Securing Mechanism
M-4	Environmental Management Plan	Development of, and adherence to, an Environmental Management Plan (EMP) which will be in accordance with an Outline EMP to be submitted with the Section 36 Application. The EMP will include measures to manage the environmental risks associated with the construction and operation of the offshore components of the Project.	Section 36 and marine licence consent conditions. Secured via Appendix 6 Outline Environmental Management Plan .
M-5	Invasive Non-Native Mitigation Plan	Development of, and adherence to, an Invasive Non-Native Species Mitigation Plan (INNSMP). This plan will detail mitigation measures to reduce the introduction and transfer of invasive non-native species.	Section 36 and marine licence consent conditions. Secured via Appendix 8 Invasive Non-Native Species Mitigation Plan .
M-6	Soft-Start and Ramp-Up for Piling	Implementation of soft-start and ramp-up procedure for piling. Each piling event would commence with a soft-start at a lower hammer energy followed by a gradual ramp-up for at least 25 minutes to the maximum hammer energy required. The soft-start and ramp-up allows mobile species to move away from the area before the maximum hammer energy with the greatest noise impact area is reached.	Section 36 and marine licence consent conditions. Secured via Appendix 9 Draft Marine Mammal Mitigation Protocol which sets out the requirements for a Piling Noise Mitigation Plan.
M-7	Marine Pollution Contingency Plan	Development of, and adherence to, a Marine Pollution Contingency Plan (MPCP). The MPCP will provide guidance to the Project personnel, contractors and subcontractors on the actions and reporting requirements in the event of spills and collision incidents. The MPCP will also contain emergency plans and mitigation procedures for a range of potential marine pollution incidents.	Section 36 and marine licence consent conditions. Secured via Appendix 7 Marine Pollution Contingency Plan .
M-8	Cable Plan	Development of, and adherence to, a Cable Plan (incorporating a Cable Burial Risk Assessment). The Cable Plan will confirm	Section 36 and marine licence consent conditions. Secured via the requirement for a Cable Plan, to be



ID	Parameter	Description of Mitigation Measure	Securing Mechanism
		planned cable routing, burial, and any additional external cable protection, and will set out methods for post-installation cable monitoring. Furthermore, this plan will detail environmental sensitivities and design considerations to mitigate, as far as practicable, the effects of IAC laying and associated protection during installation and operation of the Windfarm Development Area (WDA) infrastructure.	developed and submitted to the Scottish Ministers for approval before commencement of construction.
M-10	Unexploded Ordnance	Development of an Unexploded Ordnance (UXO) Threat and Risk Assessment.	Will be secured via a UXO Threat Risk Assessment, which will be submitted as part of a separate Marine Licence application submission prior to construction.
M-18	Navigational Safety Plan	Development of, and adherence to, a Navigational Safety Plan (NSP). This plan will describe measures put in place related to navigational safety, including information on safety zones, charting, construction buoyage, temporary lighting and marking, and means of notification of activities associated with the WDA to other sea users. This will be in accordance with Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan .	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan .
M-19	Notice to Mariners	Advanced warning and accurate location details of construction, maintenance and decommissioning operations, associated Safety Zones and advisory passing distances will be given via Notices to Mariners and Kingfisher webpage. All notices will be uploaded to the Project website and provided at least 14 days prior to works.	Included within NSP content which is a standard Section 36 and marine licence consent condition. An outline NSP has been provided in Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan .
M-20	Lighting and Marking Plan	Development of, and adherence to, a Lighting and Marking Plan (LMP). This plan will set out the marine and aviation navigational lighting and marking measures to be applied during the construction and operation of the WDA. This will be in accordance with Appendix 12 Outline Lighting and Marking Plan .	Section 36 and marine licence consent conditions. An outline LMP has been provided in Appendix 12 Outline Lighting and Marking Plan .
M-21	Best practice guidance related to fisheries	Adherence to best practice guidance with regards to fisheries liaison and procedures in the event of interactions between the WDA and fishing activities.	Section 36 and marine licence consent conditions. Secured via Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan .
M-22	Commercial Fisheries Working Group	A Commercial Fisheries Working Group (CFWG) will be organised to encourage collaborative, proactive and transparent engagement between the Project and fishing industry and communities. The CFWG will be a forum for the Applicant and commercial	Section 36 and marine licence consent conditions. Secured via Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan .



ID	Parameter	Description of Mitigation Measure	Securing Mechanism
		fisheries stakeholders to share updates, requests and suggestions to help inform the Project approach and the Applicant's understanding of any emerging concerns or challenges. Noting the confidential nature of some commercial fisheries information and areas of interest, one-to-one engagement will continue to be offered to fishers throughout the lifetime of the Project, led by the Project's appointed CFLO.	
M-23	Safety Zones	Application for and use of Safety Zones of up to 500 m around surface piercing infrastructure during construction, major repairs and decommissioning phases.	Application submitted under Section 95 and Schedule 16 of the Energy Act 2004. Will also be referenced within the NSP, secured under standard Section 36 and Marine Licence condition.
M-24	Dropped Objects	Dropped objects on the seabed during works associated with the WDA which may pose a hazard will be reported in line with the ScottishPower Renewables Dropped Object Procedure, including actions required by the Marine Directorate - Licensing Operations Team. Objects will be recovered where they pose a hazard to other marine users and where recovery is possible.	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan.
M-25	Marking	All WDA infrastructure will be appropriately marked on the United Kingdom Hydrographic Office Admiralty Charts.	Provision of relevant information to United Kingdom Hydrographic Office (UKHO) required under standard marine licence conditions.
M-27	Emergency Response and Cooperation Plan	Development of, and adherence to, an Emergency Response and Cooperation Plan (ERCoP). This plan ensures co-operation with the MCA by detailing the design parameters of the WDA, emergency contact details, and processes to be followed.	Section 36 and marine licence consent conditions. Secured via an Emergency Response and Cooperation Plan which will be developed and submitted prior to construction.
M-28	Guard Vessels	Where deemed appropriate by risk assessment, guard vessels will be used to ensure awareness with Safety Zones (M-23) or advisory passing distances.	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan.
M-29	Marine Coordination Centre	A marine coordination centre will be implemented to manage Project vessels throughout construction, operation and maintenance and decommissioning.	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan.
M-31	Vessel Marine Regulations	Compliance of all Project vessels with international Marine Regulations as adopted by the Flag State, notably Convention on International Regulations for Preventing Collisions at Sea (COLREGs) IMO, 1972/77) and International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan. The Project will employ a dedicated competent resource to verify



ID	Parameter	Description of Mitigation Measure	Securing Mechanism
			compliance with international Marine Regulations, including a Marine Operations Management Manual and a suite of Project documentation specific to Marine Operations.
M-32	Vessel Management Plan	Development of, and adherence to, a Vessel Management Plan. This plan will provide the procedures for management and coordination of vessels to mitigate the impact of Project vessels.	Section 36 and marine licence consent conditions. Secured via Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan.
M-34	Development Specification and Layout Plan	Development of, and adherence to, a Development Specification and Layout Plan. The layout of the WTGs will be finalised post consent. Consultation with the MCA and Northern Lighthouse Board (NLB) will be undertaken to ensure that the specific WTG layout is compatible with potential SAR activity (M-26).	Section 36 and marine licence consent conditions. Secured via the requirement for a Design Specification and Layout Plan, which will be submitted to Scottish Ministers for approval prior to the commencement of construction.
M-35	Failures of Lighting and Marking	Failures of the lighting and marking in the WDA will be appropriately reported and rectified as soon as practicable. Interim hazard warnings (i.e. Notice to Mariners (M-19)) will be put in place as required.	Section 36 and marine licence consent conditions. Secured via Appendix 12 Outline Lighting and Marking Plan.
M-36	Site Navigation Marking	Marking and lighting of the site following consultation with NLB and in line with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) Guidance G1162 (IALA, 2021) including a buoyed construction area.	Section 36 and marine licence consent conditions. Secured via Appendix 12 Outline Lighting and Marking Plan.
M-46	Decommissioning Programme	Development and adherence to a Decommissioning Programme. This programme will identify all the items of equipment, infrastructure and materials that have been installed or drilled and will describe the decommissioning solution for each, whilst considering the potential environmental effects of each method alongside appropriate mitigation techniques that can be implemented.	Section 36 and marine licence consent conditions. Secured via a Decommissioning Programme, which will be developed and submitted to Scottish Ministers for approval before commencement of construction.

3.4 GOOD PRACTICE MEASURES

3.4.1 Code of Good Practice for Contracted Vessels

36. The Applicant is committed to employing industry standard good practice measures during the construction, O&M and decommissioning phases of the Project.
37. When the Applicant appoints contractors for marine works, they will be contractually required to follow a code of good practice to ensure external communication is accurate and to aid coexistence with the fishing industry. This will include the following considerations when contracted vessels are undertaking works or services relating to the WDA:



- Ensure all vessels adhere to Convention on the International Regulations for Preventing Collisions at Sea (COLREGs; International Maritime Organization, 1972) and The International Convention for the Safety of Life at Sea (SOLAS; International Maritime Organization, 1974) requirements;
- Ensure all vessels do not engage in any commercial or recreational fishing activities;
- All vessels will maintain collaborative, proactive and professional communications with fishing vessels during offshore operations;
- All vessels will monitor at all times the required Very High Frequency (VHF) channels so as to receive communications directly from fishing vessels;
- All vessels will adhere to the Project VMNSP; and
- All vessels will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gears.

3.4.2 Navigational Safety Measures

3.4.2.1 Cable Burial

38. Cable minimum DoL (i.e. the distance between mean seabed level and the top surface of the buried cable) will be between 0.3 m and 3 m but is typically between 1.0 m and 2.0 m in seabed substrates consisting of granular material or soft clay. Where practicable, the Applicant will seek to achieve DoLs of 1.0 m to 2.0 m for all offshore cable types. DoLs of up to 3.0 m may be used for areas experiencing significant seabed mobility or due to an increased external threat, such as crossing shipping lanes. DoLs of 0.3 m may be used for IACs in challenging ground conditions such as shallow outcropping rock, due to the inherent protection it provides the cable at a shallower DoL. OSP link cables and offshore export cables would, as far as practicable, have a minimum DoL of 1 m. Otherwise, external cable protection methods would be considered such as concrete mattresses, rock placement, rock bags and nature inclusive design solutions.
39. Cable burial is the preferred means of cable protection for the IACs, OSP link cables and the portion of offshore export cable within the WDA [noting that the remainder of the offshore export cable to shore is not included within this FMMCP at this time]. Details of planned cable burial will be confirmed in a CaP to be prepared by the Applicant and approved by MD-LOT before commencement of construction of the Project. The CaP will be informed by the Cable Burial Risk Assessment (CBRA) to assess site specific risks considering existing human activities and site soil characteristics. In addition, a seabed mobility study will be provided if applicable using mobile site data and cable route design. These studies will be used to establish the required minimum DoL of each cable to provide a reasonable level of protection for the lifetime of the Project. The seabed mobility study will highlight any sections of the cable subject to exposure to be maintained during operation of the Project.
40. The DoL remains subject to revision within the design envelope following update of the above studies and assessments as the detailed cable routes are developed or completion of detailed pre-construction geotechnical and geophysical investigations.
41. The CaP will also set out an approach to surveys of cables and any protection during the operational life of the WDA, and measures to be taken in the event of cable exposure.

3.4.2.1.1 Stakeholder Engagement on Cable Burial

42. The Project recognises that subsea export and inter-array cables may interact with commercial fishing activity during both installation and operation. To support safe coexistence and minimise disruption, the Applicant will maintain targeted engagement with commercial fishers and representative bodies specifically on cable route refinement, cable burial planning and the CBRA, alongside the wider fisheries liaison set out in this FMMCP. The Applicant will:



- Seek fishers' local knowledge of fishing activity (e.g., core fishing grounds, local seasonal fishing patterns, gear types and operational constraints) within the cable corridor(s) and at landfall/nearshore approaches, to inform route refinement and construction planning;
- Engage with fishers during development of the cable burial plan and associated CBRA, including discussion of seabed conditions, practicable burial targets, and areas where burial performance may be challenging, so that fisheries risks and mitigation can be considered early in the design and consenting process;
- Discuss cable protection options with the fishing industry where additional protection may be proposed; and
- Engagement will be undertaken through the CFLO and the Commercial Fisheries Liaison Group established for the Project.

3.4.2.1.2 HorizonWatch

43. To strengthen early visibility of proposed cable routes and support navigational safety for fishing vessels, the Applicant also commits to participating in the SFF HorizonWatch initiative, and to providing project cable route information in the format required for HorizonWatch distribution (subject to appropriate controls around versioning and change management). HorizonWatch is intended to share early-stage, proposed subsea cable route information with fishers (including downloadable plotter files), helping to address the information gap before as-laid datasets are available.
44. This commitment is in addition to standard post-installation information sharing routes (e.g., notices and as-laid information), and will be used to complement, rather than replace, direct, two-way liaison with affected fishing interests.

3.4.2.2 **Safety Zones and Advised Safe Working Distances**

45. The Applicant will apply for temporary Safety Zones of up to 500 m around surface piercing infrastructure during construction, during major maintenance undertaken in the operational phase, and during the decommissioning phase; and 50 m Safety Zones will be established around pre-commissioned infrastructure.
46. The Applicant will issue advised safe working distances for other active works where formal Safety Zones do not apply; for example, around construction vessels laying cables. Advised safe working distances will be temporary and up to 500 m radius around vessels undertaking active Project works.
47. Where appropriate, guard vessels will also be used to ensure awareness with Safety Zones or advised safe working distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, O&M, and decommissioning phases.
48. During the construction phase, the WDA will be marked as a buoyed construction area. There will be no restriction on entry into the buoyed construction area other than through any active formal Safety Zones and advised safe working distances, noting the Cardinal Marks (buoys) will advise Mariners to avoid the area.
49. Safety Zones, advised safe working distances, and buoyed areas will be communicated to marine users via NtMs.

3.4.2.3 **Vessel Transit Routeing and Shelter Areas**

50. Project related vessel activity will be managed by the Marine Coordinator via a Permit to Work system, which acts as a Safety Management tool that requires permission for work to be obtained, assesses risks and implements necessary precautions before entering a works area and carrying out specific activities offshore. Prior to the Marine co-ordination centre being in place, the vessel PTW system will be utilised and will be overseen by the client representative appointed by the Project. Once the location of the WDA's construction port(s) is/are confirmed, indicative vessel transit routes to and from the works area will be identified in the VMNSP (which will be subject to



consultation with fisheries stakeholders prior to its approval) and vessels will adhere to these routes wherever practicable. Vessel anchorage areas, and areas to be avoided, will also be identified and Contractors will be instructed to comply where practicable.

51. The designation of preferential shelter areas does not over-ride the authority of any vessel master to take whatever navigational decisions are required for the safe operation of that vessel and/or other sea users.
52. It is also recognised that there is no expectation that indicative transit routes, shelter areas, and holding areas will be cleared of static fishing gear. As such, contracted vessels associated with the Project are always required to maintain a lookout for, and avoid, appropriately marked fishing gear.

3.4.2.4 Marking and Charting

53. During the construction phase, the WDA will be clearly marked as a construction area using buoys. All construction vessels and installed WDA infrastructure will be appropriately lit and marked in accordance with the LMP. All installed infrastructure will be marked on UKHO Admiralty Charts.

3.4.2.5 Dropped Objects

54. The requirement for procedures relating to dropped objects will be set out in the relevant conditions of the Marine Licence(s), and broadly as follows: if the Licensing Authority is of the view that any accidental deposits have occurred and should be removed, then the materials must be removed by the Licensee as soon as is practicable and at the Licensee's expense.
55. Should the dropped object pose a fishing risk or hazard, a NtM and Kingfisher Notice will be issued once the location, and details of the object can be established.
56. The Applicant will set out the process related to dropped objects in a Project specific Dropped Objects Procedure.

3.4.2.6 Boulder relocation

57. The Applicant will provide boulder, significant debris¹ and archaeology relocation information to the fishing industry with outputs in GIS/shapefile format compatible with plotter systems.

3.4.3 Procedures Specific to Fisheries Interactions

3.4.3.1 Procedure in Relation to Gear Fastening or Loss

58. The Kingfisher Information Service - Offshore Renewable & Cable Awareness project (KIS-ORCA) is a joint initiative between Subsea Cables UK and RenewableUK and is managed by the Kingfisher Information Service of Seafish. All details of the Project will be provided within KIS-ORCA data, which should be downloaded by fishers onto a vessel's fishing plotter. To reduce the risks of fishing near offshore structures, it is essential for fishers to hold up to date KIS-ORCA information.
59. As per the Seafish et al. (2016) guidance on reducing the risks while fishing:

“In the interests of fishing safety and to prevent damage to subsea structures, fishermen are advised to exercise caution when fishing in the vicinity of subsea cables and renewable energy structures. If it is suspected that gear has snagged a subsea cable, DO NOT endanger vessel and crew by attempting to recover gear. If gear is snagged and it is thought prudent to slip or cut the fishing gear in an attempt to clear a subsea structure, the gear should always be lowered to the seabed first. To slip or cut anything bearing excessive weight should never be attempted”.

¹ For the purposes of this commitment, “debris” means discrete items of material identified during survey or construction activities that are of a size, nature or location likely to present a material interaction risk to fishing activity; it does not include small, diffuse or immaterial seabed material.



60. The following procedure replicates that which has been in place in respect of the UK offshore oil and gas industry. It reflects Seafish and KIS-ORCA guidance and describes the steps that should be undertaken in the event of fishing gear becoming fastened within the boundaries of the WDA:
- If the fastened gear is not easily retrieved, fishers should not apply excessive winch, line or net hauler loads or engine powers in attempts to retrieve fastened gear;
 - Fishing vessel should advise the coastguard or the Marine Coordinator, giving an accurate position of the vessel and/or lost gear;
 - If the coastguard or the Marine Coordinator, confirms that the vessel is in the immediate vicinity of a cable, serious consideration will be given to the slipping of the gear and buoying and recording its position;
 - After buoying off the gear, the position should be confirmed with the coastguard and the CFLO;
 - On return to port, the local Fishery Office should be contacted, and the incident registered in the normal manner; and
 - On no account should skippers grapple in an attempt to recover fishing gear lost or cut away in the vicinity of the cables associated with the Project.
61. The following procedure, based on Seafish and KIS-ORCA guidance, should be followed in the event of fishing gear becoming lost or damaged within the WDA:
- On discovery of the lost or damaged gear at sea, the fisher must record the date, time, location (coordinates) and description of the gear lost, or the damages sustained within the vessel logbook;
 - On return to port, the fisher must report the incident to the CFLO within five days and if possible, provide photos of the damaged gear;
 - Once the CFLO has been informed of the incident, the CFLO will provide a gear loss or damage claim form to the fisher. The fisher will be asked to complete the fishing gear loss or damage claim form which will provide the relevant details for assessment of the likely cause of the loss of or damage to the gear, the value of the lost or damaged fishing gear and any subsequent loss of earnings which incurred as a result of the incident;
 - Once completed, the fishing gear loss or damage claim form should be sent to the CFLO as soon as possible. This should be supported with photographs of the damaged fishing gear, evidence of the earnings from fishing at the time of the incident, and a quote of the cost for either repair of the damaged fishing gear by a third-party or the costs of labour and materials should the skipper and crew undertake replacement of gear themselves; and
 - Following the receipt of this fishing gear loss or damage claim form, the Applicant will review the information provided and carry out appropriate further investigations. The Applicant will respond to the claim via their CFLO as soon as possible.
62. Claims for loss or damage to fishing gear will not be considered where a skipper of a vessel has ignored notices, guard vessel communications, NtM, CFLO communications, infringed Safety Zones, or in any other circumstances where the damage to or loss of the gear is as a result of the neglect or default of the skipper of a vessel.

3.4.3.2 Procedure for Static Gear Relocated/Removed by Gear Owner

63. During the construction, O&M and decommissioning phases, Safety Zones and/or advised safe working distances around construction/decommissioning and maintenance works respectively will be determined and communicated to the commercial fishing industry. If static gear is set within the offshore Safety Zones and advised safe working distances, the owner of this gear will be requested by the Applicant and/or its related parties or its Contractors to relocate or remove gear from within that area provided that:



- Safety Zones and advised safe working distances are communicated to the affected recipients within a reasonable period to allow gear to be relocated/removed prior to works being undertaken; and
- The gear owner is reimbursed for gear relocation/removal following an evidence-based approach.

64. The reimbursement calculation may, where appropriate, have regard to evidenced and reasonable costs associated with gear relocation or removal.

3.5 ADDITIONAL MITIGATION

3.5.1 Overview

65. The WDA EIAR identified significant effects during the construction phase for the following fleets:

- UK potting targeting crab and lobster.

66. In response to the significant effects, it was identified that additional mitigation specific to identified fleets is required beyond that described in **Sections 3.3** and **3.4**.

67. The Applicant proposes to deliver additional mitigation through disruption agreements, where applicable, which will be implemented to coordinate and agree appropriate co-operation and establish evidence-based disruption payments to fishers.

3.5.2 Disruption Agreements

68. The Applicant will implement a disruption agreement process in relation to the WDA where significant effects remain after minimisation and mitigation efforts have been considered for any construction, or pre-construction phase temporary disruption to fishers. The Applicant will consider evidence-based commercial disruption agreements with fishers as a last resort.

69. The Applicant will consider entering these agreements with those targeting fisheries upon which the WDA has been identified to have a significant impact on within the WDA EIAR during the construction phase. The process will include consideration of eligibility, evidence requirements, indicative timescales and, where necessary, alternative dispute resolution.

70. Disruption payments will only be established based on factually accurate and justifiable claims to achieve a position whereby fishing interests are neither advantaged nor disadvantaged and agreements reflect an individual's economic dependency on the area. Affected commercial fishing businesses will be required to provide evidence to corroborate any claims. Evidence requirements will be proportionate and take into account practicalities associated with providing such evidence. Indicative timelines for the submission and review of claims will be set out as part of the disruption agreement process.

71. If mutual agreement cannot be reached then both parties should seek to undertake Alternative Dispute Resolution (ADR), led by an independent third-party. ADR will form part of the disruption agreement process where agreement cannot otherwise be reached. The Applicant will set out an appropriate process for the submission and review of claims, including indicative timescales, proportionate evidence requirements, and a clear route to independent ADR where matters remain unresolved.

3.5.2.1 Evidence base

72. The following documentation and data are expected to be required to form an evidence base to support consideration of eligibility for a disruption agreement:

- Copy of certificate of registry for each vessel for which a claim is being made;
- Copy of a valid MCA certification or equivalent;



- Copy of the relevant vessel fishing licences and entitlements;
- Sight of vessels' fishing charts or Global Positioning System (GPS) plotter records to provide clear historic evidence in the area of the operations. Alternatively, where such data is not attainable, provide annotated admiralty charts indicating areas fished, this may be undertaken with assistance from the CFLO who will provide graphics and work with the claimant to understand the areas fished;
- Evidence of monthly sales notes for the three-year time period prior to the claim;
- Annual fishing accounts of the vessels concerned for a three-year time period or equivalent evidence of annual earnings (e.g., self-assessment tax return); and
- Monthly fishing vessel landings data or and/or fisheries landings data held by fisheries authorities (requiring declaration from vessel owner for release of individual records).

73. The CFLO will support vessel owners, if required, in developing a suitable evidence base to support consideration of eligibility for a disruption agreement, including where full documentary evidence is not practicable or possible to obtain.

4 MONITORING

4.1 OVERVIEW

74. The aim of commercial fisheries monitoring is to understand variations in commercial fisheries activity that may be in response to the presence of the Project and use this to inform updates to the FMMCP.

75. The key objective of monitoring is to assess, by gear type and with reference to the existing baseline of activity, whether fishing activity resumes within or adjacent to the WDA. The monitoring will involve the following steps:

- Collate and analyse data on commercial fisheries landings and activity by International Council for the Exploration of the Sea (ICES) rectangle, including landing statistics and Vessel Monitoring System (VMS) data with the objective to extend the baseline assessment provided within the EIAR, see **Chapter 12 Commercial Fisheries** and **Appendix 12.1 Commercial Fisheries Technical Report** of the WDA EIAR;
- Collate and analyse data on commercial fisheries landings by port monthly;
- Collate and analyse other sources of evidence of commercial fisheries activity as may be reasonably available on a regular basis including information obtained through engagement with local fishers, fisheries associations and the CFLO, and qualitative evidence such as fisher-led impact reporting and skipper testimony, where available; and
- Monitor and analyse available data and evidence to better understand any variations and patterns in commercial fisheries activity.

76. Any updates to the FMMCP may be informed by an understanding of any changes in fishing activity, within or adjacent to the WDA, as evidenced by the monitoring proposed. The scope and duration of monitoring beyond the early O&M period will be reviewed through the benchmarking process with MD-LOT and relevant stakeholders, in accordance with relevant Scottish monitoring guidance.

4.1.1 Data Sources

77. Monitoring will involve:

- Review of Marine Management Organisation (MMO) landings data across the Commercial Fisheries Regional Study Area by ICES rectangle and port to allow monitoring of target species, tonnage of catch and first sales value monthly;
 - For each port, monthly data will be analysed to determine live weight of key species landed by all vessels, specifically for crab and lobster fisheries; and
 - Inter annual variations between monthly landings will be examined.



- Additional sources of information will be reviewed to corroborate findings of the analysis of the MMO landing statistics and identify trends not detected by the MMO landings data;
- Analysis of OFLO and guard vessel records (where available);
- Analysis of marine traffic surveys in respect of fishing vessel activity (where available);
- Analysis of Marine Coordination Centre records in respect of fishing vessel activity;
- Analysis of VMS data in respect of fishing vessel activity, based on annual geographic datasets produced by MMO for VMS on UK vessels;
- Analysis of inshore VMS data, where available;
- Analysis of Remote Electronic Monitoring (REM) systems data for scallop vessels, where available; and
- Consultation with the commercial fishing industry via the CFLO.

4.1.2 Reporting Deliverables

78. Data will be collated quarterly, to examine monthly landings and activity over that preceding period. It is proposed that reporting outputs will be delivered to cover monitoring results for the following phases:
- Post-consent phase (from consent award onwards provided as a continuation of the baseline presented in the EIAR), with monitoring deliverable: Report 1;
 - Pre-construction phase, with monitoring deliverable: Report 2;
 - During construction phase: Start of construction to end of construction, including reporting on an annual basis, with monitoring deliverables: Reports 3a, 3b, 3c etc.; and
 - Post-construction phase: End of construction to five years after the completion of construction, or as agreed with MD-LOT, with monitoring deliverables: Reports 4a, 4b, 4c etc.
79. Benchmarking and adaptive review will be undertaken, as part of these reporting deliverables, so that the scope and need for ongoing monitoring can be kept under review in light of the evidence obtained.

5 COMMUNICATION

5.1 PRINCIPLES OF LIAISON

80. The Applicant regards coexistence as the presence of both industries at the Project. An approach of avoiding and reducing impacts to the fishing industry is regarded as the most sustainable approach to coexistence and the Applicant considers effective communication and information transfer to be a key mechanism for coexistence.

5.2 ROLES AND RESPONSIBILITIES

81. This section sets out the roles and responsibilities that the Applicant and key Contractors will adopt to support its commitment to coexistence, including the appointment of a CFLO, OFLO, and FIR as necessary.
82. Details of the roles and responsibility of the Applicant and its future Contractors, as far as relevant to this FMMCP, are detailed in **Table 5.1**, with an organogram of key liaison roles provided in **Plate 5.1**.

Table 5.1 Roles and responsibilities of the Applicant and its future contractors

Role	Responsibility
The Applicant	The Applicant has overall responsibility to construct and operate the Project with due regard to minimising disturbance to fishing activities and facilitating successful coexistence.



Role	Responsibility
The Applicant's Project Director	Overall responsibility for the FMMCP, including approval of the FMMCP for submission to MD-LOT.
	Responsible for requiring sufficient resources and processes are in place to deliver the FMMCP, including maintaining employment of the CFLO.
The Applicant's Development and Stakeholder Teams	Liaising with CFLO, OFLO and FIRs, and fisheries stakeholders, in the interest of preventing conflict and facilitating coexistence.
	Facilitating any updates to the FMMCP.
Contractors and Subcontractors	Work with the Applicant to implement the FMMCP, as appropriate to their scope.
Company Fisheries Liaison Officer (CFLO)	Provide the Applicant with support and guidance regarding communication and coexistence with the fishing industry.
Fisheries Industry Representative (FIR)	Work with the CFLO and the Applicant to provide support and guidance regarding the fishing industry.
Offshore Fisheries Liaison Officer (OFLO)	Communication point between the Applicant's contractors and the fishing industry on site during offshore works.

5.2.1 The Applicant

83. The responsibilities of the Applicant in relation to this FMMCP are:

- Maintain the on-going employment of a CFLO and procure that their relevant contractors appoint an OFLO where appropriate;
- Aid in the prevention of conflict through the timely provision of information to the CFLO, FIR and the fishing industry, including in relation to construction activities, the type and location of cable protection measures where this may be required, and the timing of construction works;
- Produce and ensure implementation of Standard Operating Procedures (SOPs) to minimise and appropriately manage potential interactions with fishing vessels; and
- Communicate details of any dropped objects to the fishing industry. Dropped objects should be reported to stakeholders within 24 hours of the event occurring (or otherwise as soon as practicable); Establish suitable and evidence-based cooperation agreement and disruption payment methodologies.

5.2.2 Company Fisheries Liaison Officer (CFLO)

84. The Applicant has appointed Brown and May Marine Limited as CFLO during the development phase. The CFLO reports to the Applicant's Development Team and Stakeholder Manager. The CFLO will liaise regularly with the OFLOs and FIRs as required.

85. The CFLO's responsibilities will include:

- Being the key point of contact for fisheries stakeholders; communicating clearly and accurately with the fishing industry on behalf of the Project;
- Preparing and maintaining a project-specific register of local fishers and associations;
- Engaging in consultation with the fishing community to understand any requests and suggestions associated with the Project;
- Arranging or attending as necessary, fisheries meetings (with local fishers, fisheries associations) to:



- Promulgate information on the design envelope, construction programme, and provide updates on any changes to the Project throughout the pre-construction phase;
- Gather fishers' views on effects of projects on their working practices; and
- Work with fishers to resolve any issues or conflicts arising where practicable.
- Provide advice to the Applicant on fisheries liaison throughout the construction and operation of the proposed development;
- Develop and maintain a strong positive working relationship with the local fishing industry;
- Have and maintain a strong knowledge of the fishing industry local to the proposed development;
- Understand the interactions likely to occur between the local fishing industry and the proposed development, and any potential impacts on the fishing industry during construction and operation of the Project;
- Ensure that information is made available and circulated in a timely manner to minimise interference with fishing operations and other users of the sea; and
- Maintain availability to receive and respond to fisheries stakeholders and client enquiries, including resolution of fisheries related issues as they arise.

86. In line with the above responsibilities, the main duties of the CFLO are to:

- Maintain the fisheries stakeholder database that contains information on fishing vessel operations (e.g. vessel name, registration and port base, and skipper) within and around the Project;
- Organise, prepare updates and attend fisheries meetings, local fisheries stakeholder events and meetings with regulators, as required;
- Prepare and distribute the required information and notices of all activities associated with the Project which could affect fishing stakeholders;
- Instruct contractors on the fishing activities in the areas of work and provide details on the fishing activities and gear types that may be present, and any relevant sensitivities;
- Manage and coordinate OFLOs that are supporting works at sea, including liaising on any fisheries issues at sea, such as facilitating the relocation or removal of static fishing gear where this may be required;
- Communicate details of exposed cables and any other safety and fishing hazards to the fishing industry;
- Coordinate the activities and responsibilities of the FIRs (if required); and
- Provide monthly reporting to the Applicant during the construction phase of the Project.

87. In addition, the CFLO will support the Applicant in facilitating discussions with affected commercial fishing businesses where temporary pre-construction and construction activities require movement of static gear. The CFLO should always act professionally and not make any disclosures or commitments regarding financial arrangements without the Applicant's approval.

88. It should be noted that the CFLO is shore-based, typically working standard office hours, and is therefore not the appropriate point of contact for any offshore, non-emergency fisheries-related incident which requires an immediate or very short-term response.

89. If the incident is an emergency at sea, the fishing vessel should contact His Majesty's Coastguard via the emergency normal channels (e.g., Very High Frequency Channel 16 / Digital Selective Calling or by dialling 999/112 and asking for the Coastguard).

5.2.3 Offshore Fisheries Liaison Officer (OFLO)

90. When required, the Applicant will procure the appointment of suitably qualified OFLOs by its contractors throughout the construction and maintenance phases of the Project. This will ensure that key vessels associated with the Project include suitably skilled and experienced OFLOs who have relevant local knowledge of the fisheries which could be affected. Where reasonably practicable, an



OFLO will normally be located on the active construction or maintenance vessel undertaking the relevant activity to support situational awareness and timely communication.

91. The primary responsibility of the OFLO is to act as an effective communication point between the Applicant's Contractors and the fishing industry on site during offshore works to ensure navigational and operational safety. The OFLO will be the first point of contact for fishers at sea whilst activities are taking place. The OFLO will be in communication with the Applicant's commercial fisheries manager and the FLO to communicate with the local fishing industry the ongoing activities.
92. The primary responsibilities of the OFLOs are to:
- Maintain regular contact with the CFLO and the Applicant's personnel, Contractors and sub-contractors, as required, concerning marine traffic and fishing vessel activity in the vicinity of the Project;
 - Maintain watch for marine traffic and fishing vessel activity during marine operations and maintain regular contact with guard vessels and support vessels;
 - Communicate with the vessel master in respect of providing any relevant information on fishing vessels, and, when the Project-related vessel is not engaged in marine operations, work with the vessel master to avoid, where reasonably practicable, any fishing vessels actively engaged in fishing operations;
 - Liaise with any fishers who may have static gear deployed in the vicinity of the Project or along vessel transit routes;
 - Provide the required support to the CFLO in the handling of any claims by fishers who may have static gear deployed in the vicinity of the Project;
 - Work with the vessel master to ensure adherence with relevant aspects of the FMMCP;
 - Develop and provide training for all vessel personnel to include induction and training for staff with specific fisheries liaison responsibilities;
 - Record details of any fishing activity in and around the Project (including fishing vessels, gear and communications with fishers) and of any events of infringement or movement or damage to static gear;
 - When engaged in OFLO duties, provide daily update reports via email to the CFLO; and
 - Attend meetings, when required, with the Applicant's personnel and the CFLO.
93. Where practicable, and subject to meeting all required competency, certification, safety and contractual criteria, the Project will seek to appoint suitably qualified local fisheries advisors to undertake OFLO duties.

5.2.4 Fishing Industry Representatives (FIR)

94. To further aid the establishment of effective communication channels and to benefit from extensive local knowledge, one or more FIR(s) may be employed. FIRs can be helpful when communicating information across a wide geographic area to assist the CFLO in delivering face-to-face information dissemination. An FIR will support activities that would otherwise be undertaken by the CFLO (if a FIR is not in position).
95. FIRs will make skippers of fishing vessels aware of any forthcoming operations and other on-going activities related to the proposed development. The roles and responsibilities of FIR and CFLO can be very similar and often delivered by one individual, dependent on knowledge and resource requirements.
96. The primary responsibilities of the FIRs are:
- Liaise with fishing skippers with the objective to provide details of fishing activities in the area and particular sensitivities;
 - Maintain mutually productive relationships between the Applicant and fisheries stakeholders;



- Be the local conduit for liaison, providing the day-to-day point of contact for fishers to transmit all their relevant concerns in relation to activities associated with the Project;
- Log all concerns raised by the fishers, including date, individual and details related to the type, nature and location of the concern and regularly provide this log to the CFLO; and
- Assist the CFLO at a local level in undertaking the tasks listed above, including:
 - Assist the Applicant’s representatives to identify areas of concern or conflict at an early stage so that as far as is practicable appropriate measures can be implemented to address these;
 - Assist with the liaison between OFLOs and CFLO where necessary, including liaising on any fisheries issues at sea;
 - Assist in the distribution of notices and relevant project information to local fisheries stakeholders;
 - Regularly update the contacts database; and
 - Maintain availability as required for addressing local fisheries issues if they arise.

97. Any FIR(s) will be contracted by the Applicant subject to a Terms of Reference and contract Terms and Conditions. While a FIR may be associated with a specific organisation or association, they will not be acting to the sole benefit of that association. Should an instance arise whereby an industry association or individual fishers does not wish to communicate via the FIR for that area, the CFLO will undertake such direct responsibilities to ensure that the association/fishers still have a line of communication to the Applicant and vice versa.

98. Where practicable, and subject to meeting all required competency, certification, safety and contractual criteria, the Project will seek to appoint suitably qualified local fisheries advisors to undertake FIR duties.

5.2.5 Guard Vessels

99. During construction and maintenance, the Project may have guard vessel(s) on site. The role of the guard vessel(s) is to facilitate safe construction through liaison with other sea users in the vicinity of the works.

100. Guard vessel(s) will also be in regular communications with the OFLO and CFLO to exchange information on fishing activity and any static fishing gear in the vicinity of the Project.

101. Where practicable, and subject to meeting all required competency, certification, safety and contractual criteria, the Project will seek to appoint suitably qualified local vessels and crews to undertake guard vessel duties.

5.2.6 Marine Coordination

102. In addition to CFLO, FIR(s) and OFLO, a Marine Coordinator for the Project will be appointed. The Marine Coordinator will ensure the marine coordination function is delivered continuously (i.e., 24/7). The Marine Coordinator coordinates all marine operations relating to the Project; including monitoring and managing all construction vessel activity. For dissemination of Project activity information to other vessels offshore in the vicinity of the Project, including fishing vessels, the Marine Coordinator shall act as the principle point of reference for the CFLO/FIRs/OFLOs, and shall be a point of contact for vessels navigating close to the Project.

5.2.7 Commercial Fisheries Working Group

103. To facilitate collaborative, proactive and transparent engagement with the fishing industry and communities, the Applicant has committed to working together with key commercial fisheries stakeholders, as part of a MachairWind CFWG.

104. During a project update meeting on 09 December 2025, agreement was met between the Applicant and below stakeholders to engage together in relation to the Project:



- Clyde Fishermen's Association (CFA);
 - Communities Inshore Fisheries Alliance (CIFA);
 - Scottish Fishermen's Federation (SFF);
 - Scottish Pelagic Fishermen's Association (SPFA);
 - Scottish White Fish Producers Association (SWFPA); and
 - South West Coast Regional Inshore Fisheries Group (SWCRIFG).
105. The CFWG will be led by the Project's appointed FLO, with the Applicant and above stakeholders present.
106. The purpose of the CFWG is to:
- Ensure Project information is shared in a timely manner, allowing for discussion and stakeholder input;
 - Enable stakeholders to share updates, questions and requests of relevance to their members;
 - Identify and address challenges and/or concerns that may arise, by facilitating two-way dialogue between the Applicant and commercial fisheries industry and communities;
 - Share learnings to maximise fishers' participation in the engagement process, such as the preferred methods, timings and platforms for communicating with members; and
 - Enhance decision making by listening to commercial fisheries expertise and local knowledge.
107. Ultimately, the key objective of the CFWG is to facilitate meaningful engagement, enabling coexistence wherever possible during the construction, O&M and decommissioning phases of the Project, to reduce the overall impacts of the Project on commercial fisheries.



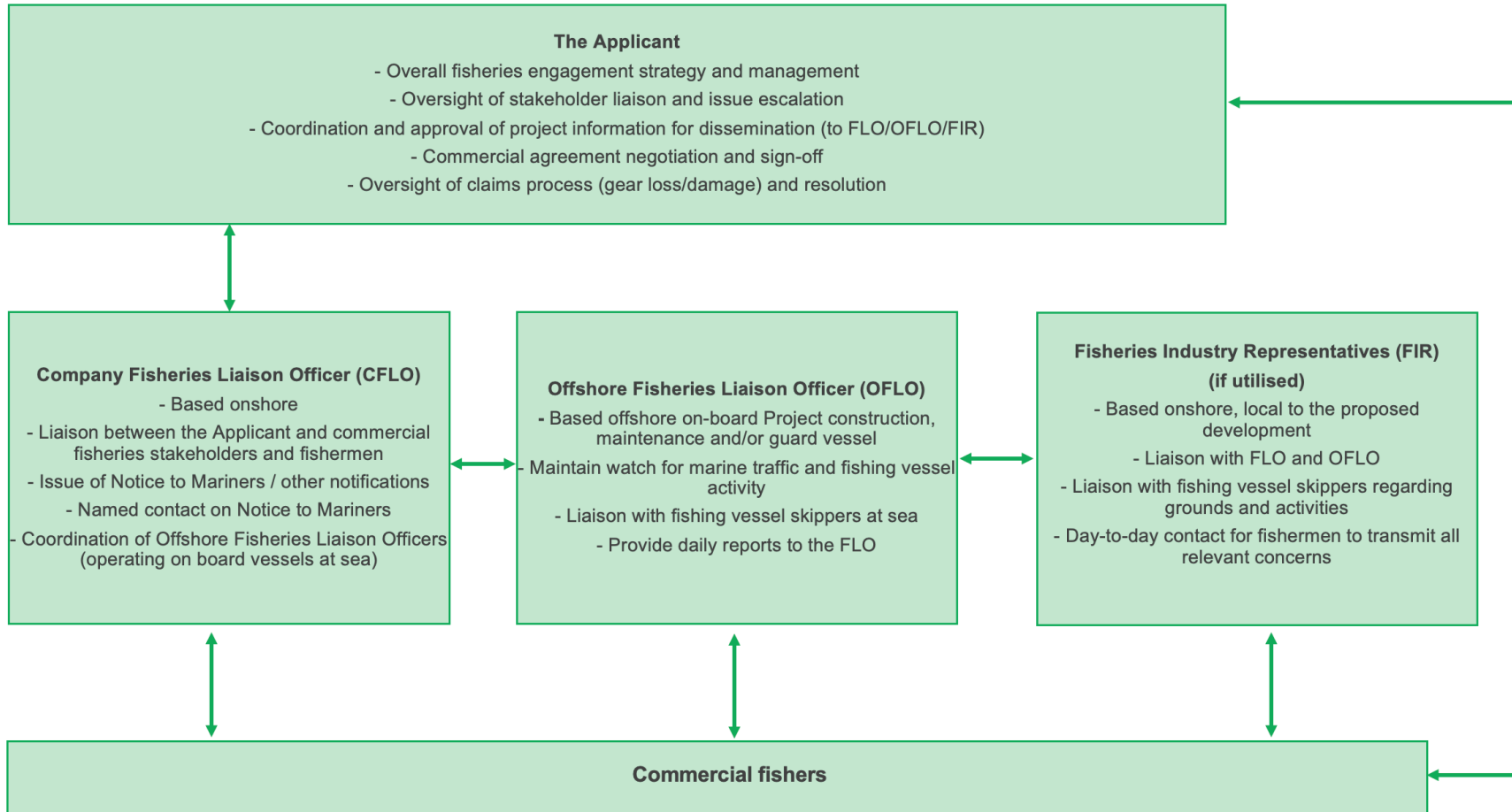


Plate 5.1 Roles and responsibilities of the Applicant, CFLO, OFLO and FIR and communication links to fisheries stakeholders



5.3 ONGOING ENGAGEMENT

- 108. Throughout all phases of the Project, the Applicant will remain committed to maintaining open dialogue and effective communications with the fishing industry. This is key to supporting the Applicant’s commitment to coexistence where possible to enable both the Project and the relevant commercial fisheries to manage works through awareness of upcoming activities, for example notification of planned construction works.
- 109. Example liaison scenarios are presented in **Plate 5.2**. It is understood that alternative or more specific scenarios may occur, but the principles remain that a fisheries stakeholder or fishers currently onshore and wishing to communicate with the Applicant should contact the relevant FIR and/or CFLO; where they are offshore and working in the vicinity of the Project with a more immediate issue or concern, they should contact the CFLO and/or the OFLO.
- 110. Contact details of the CFLO will be included within NtMs that will be issued a minimum of 14 days prior to the commencement of works, where feasible. Contact details for the CFLO will also be disseminated to fisheries stakeholders as well as Kingfisher/KIS-ORCA.
- 111. In the pre-application stage, the Applicant has sought consensus in regard to fishers’ preferences for continued engagement, with agreement that in person meetings were the preferred approach. The Applicant will continue to engage in person, where possible. To maximise meaningful engagement with fishers, the Applicant will also continue to seek fishers’ engagement preferences, noting they may change over the lifetime of the Project.
- 112. Throughout the development phase, different methods of communication will be used to promulgate project information to the fishing industry. The project information to be communicated and the methods of communication are summarised in **Table 5.2**.

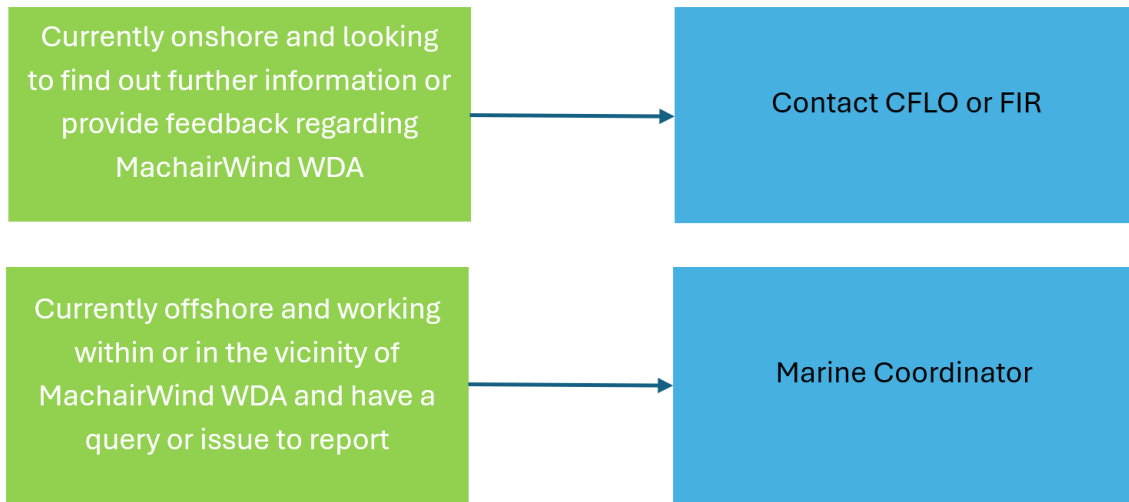


Plate 5.2 Fisheries contacts in specific scenarios

5.3.1 Weekly Notice of Operations

- 113. During the construction phase, the Applicant will issue a WNoO to fisheries stakeholders to provide a clear, regular overview of planned and ongoing activities within the WDA. The WNoO will set out the anticipated programme for the week ahead, including the location/working areas, the nature of works (e.g., foundation installation, cable lay/burial, survey activities), and the Project vessels expected to be active.
- 114. To support identification at sea and improve situational awareness for fishers, the WNoO will also include images of Project-related vessels (and/or representative vessel types) together with a short description of their typical operations and interaction risks (e.g., cable lay, anchor patterns, guard



vessel activities). The Applicant will disseminate the WNoO via the CFLO distribution list and other agreed channels, and the WNoO will complement (rather than replace) formal NtMs and any other required notifications.

Table 5.2 Project information communication summary

Communication	Information Promulgated
NtM, Kingfisher Bulletin	A NtM will be issued to provide information such as the nature of activity, location and vessels involved prior to the commencement of new activities. The NtM will be circulated to the local distribution list, uploaded to the Kingfisher Bulletin and made available on the Applicant’s website 14 days in advance of the commencement of new activities, where possible. The CFLO will further distribute this NtM to the fisheries distribution list. NtMs will include information on vessels, their operators and contact details etc. planned to engage in activities throughout works.
WNoO	Upon commencement of construction and during active construction activities, a weekly notice of operations and activities will be provided to fisheries stakeholders. This will include details of the activities completed, the forthcoming planned construction activities and the Project vessels undertaking these activities.
Activities which may require gear relocation or may cause significant disruption to fishing activity	Notices and information distributed not less than 14 days prior to survey mobilisation (where feasible).
Dropped Objects	<p>In the event of a dropped object offshore, the Applicant will notify MD-LOT within 24 hours of the event occurring (or otherwise as soon as practicable). Should the dropped object pose a fishing risk or fishing hazard, a NtM will be issued once the location, and details of the object can be established. Furthermore, the Applicant will issue a ‘dropped objects’ form to MD-LOT and other relevant stakeholders as required (including the SFF), in the template issued by the MD-LOT, as soon as reasonably practicable following the event.</p> <p>The Applicant will retrieve the dropped object where practicable to do so.</p> <p>Any further steps as required in consultation with MD-LOT will be notified through an NtM where applicable.</p>
Spatial information	Relevant spatial information for key hazards, such as boulder relocations, cable exposures, rock placement, dropped objects, temporary obstructions, safety zones and as-laid cable positions, will be provided in GIS-compatible and plotter-ready formats where appropriate, for example OLEX, Sodena and/or Maxsea formats, as utilised in Horizon Watch.
CFWG	Regular meetings led by the Project’s appointed FLO, to enable collaborative and transparent discussions between the Applicant and the commercial fisheries stakeholders. Information that will be shared includes, but is not limited to, Project information and updates, fisheries engagement findings and lessons learned, association members’ requests, questions and suggestions, emerging challenges and/or concerns relating to the commercial fisheries industry and communities.
Marine Coordination	The Marine Coordination Centre will provide a direct point of communication for fishing vessels when active in areas relevant to the Project.
Unscheduled and ad hoc liaison	Additional unscheduled liaison and consultation will be undertaken by either the CFLO or the FIR as required to address issues and fishers’ concerns where practicable as they arise.



6 STATUS, REVIEW AND UPDATE FREQUENCY

115. The FMMCP will be maintained throughout the Project lifecycle and will be updated post-consent to ensure it remains accurate, aligned with stakeholders' needs and expectations where practicable, and updated based on the Project's final design and programme as details are confirmed (e.g., key construction ports, vessel strategies, construction methodologies, and the final sequencing and timing of activities).
116. The FMMCP will be reviewed at intervals agreed with MD-LOT (e.g., prior to construction commencing, prior to operational phase and every five-years thereafter), and updated where necessary, subject to agreement with MD-LOT following consultation with stakeholders.

6.1 PLANNED REVIEW POINTS

117. The FMMCP will be reviewed and, where necessary, updated at the following points:
- Post-consent / pre-construction: to incorporate project details that are defined following consent (e.g., confirmed construction ports and logistics arrangements) and to align with any consent conditions and agreed monitoring and engagement arrangements; and
 - Start of each Project phase:
 - Construction phase (including mobilisation/early works where relevant);
 - O&M phase; and
 - Decommissioning phase (at this phase a separate FMMCP will be produced).
118. Updates at phase commencement will confirm phase-specific fisheries mitigation, monitoring and communication arrangements, including roles/responsibilities, contact points and any planned fisheries-related activities.

6.2 GOVERNANCE AND COMMUNICATION OF UPDATES

119. Where updates are proposed, the Applicant will:
- Share the rationale and proposed changes with MD-LOT and relevant fisheries stakeholders as appropriate;
 - Record changes and issue the updated FMMCP in a controlled manner (e.g., version control and summary of amendments); and
 - Ensure any revised measures are implemented and communicated through established fisheries liaison channels.



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ANNEXES

Annex A - Summary of stakeholder engagement carried out in relation to the FMMCP

In addition to ongoing stakeholder engagement on the Project, the **Table A.1** below provides a summary of the stakeholder engagement carried out specifically in relation to this FMMCP.

Table A.1 Stakeholder engagement activities in relation to the FMMCP

Date	Stakeholder and Type of Engagement	Summary of engagement activity, including how stakeholder views have informed the FMMCP	Applicant response where stakeholder views did not affect a change (where applicable)	Reasons for divergence of views between parties
09 December 2025 (online and face to face)	Fisheries Update meeting (in person in Aberdeen and hybrid set up) with SFF, SWFPA/M&NWFMA, SPFA, Clyde FA/CIFA, SWCRIFG and Project team (SPR and consultants)	FLOWW references removed: SFF and SWFPA requested no reference to FLOWW (old or updated) in the FMMCP; preference expressed for referencing “general good practice guidance” instead. Document format: preference for a shorter, bullet-point FMMCP recognised as a live document. Dropped objects: reporting section to distinguish navigation vs fishing risk and to emphasise that any seabed object is a fishing hazard; include retrieval expectation where practicable. Comms: add a weekly fisheries update. Navigation/safety: revisit wording on 500 m advisory safe passing distance definitions; ensure OFLO role is included in navigational/operational safety; add HorizonWatch to navigation/lighting compliance section. Data sharing: commit to provide boulder relocation outputs as GIS/shapefile suitable for conversion to plotter files. Monitoring: request for fish/shellfish or fisheries activity monitoring noted for internal consideration.	Fisheries monitoring request: feasibility not confirmed at meeting, Applicant to review internally rather than commit within FMMCP at this stage. Safety zones: requirement for 500 m safety zone for vessel transfer of personnel on structures not confirmed, Applicant to check regulatory/consent requirements before changing text.	Monitoring expectations vary (industry seeks reassurance/longer-term evidence; Applicant constrained by scope, proportionality and consent requirements). Safety zone triggers depend on regulatory interpretation and operational scenarios, requiring confirmation before committing to specific measures.
09 December 2025 onward	Follow-up actions between Project team and fisheries reps (examples/material sharing)	Actions to implement stakeholder requests: weekly update added and examples of weekly updates shared; advisory safe passing distance definitions revisited; check on personnel-triggered 500 m safety zone requirement (SPR); HorizonWatch inclusion progressed; boulder relocation data packaging as shapefile/plotter-ready to be reflected in procedures.	Any items dependent on third-party requirements (e.g., exact safety zone triggers; vessel management plan distribution mechanism) may remain “to be confirmed”.	Some measures depend on external frameworks (marine licensing/consent conditions, contractor vessel procedures), creating timing differences between stakeholder desire for certainty and developer ability to confirm.



Date	Stakeholder and Type of Engagement	Summary of engagement activity, including how stakeholder views have informed the FMMCP	Applicant response where stakeholder views did not affect a change (where applicable)	Reasons for divergence of views between parties
Feb 2026	Formal stakeholder consultation on draft FMMCP (circulation for comment, up to ~1 month)	Commitment made to share the draft FMMCP for industry comment pre-consent, with an understanding it can be updated prior to construction. Consultation will allow stakeholders to confirm acceptability of revised wording (e.g., removal of FLOWW references) and validate practicality of comms/claims/safety measures.	See Table A.2 .	Stakeholders provided further feedback on the draft FMMCP. This feedback, together with the Applicant's response is detailed in Table A.2 below.
Feb 2026	Fishers update meeting including draft FMMCP discussion (in person on Islay and hybrid set up), with fishers and Project team (SPR and consultants)	Consensus sought in regard to fishers' preferences for continued engagement, with agreement that in person meetings were the preferred approach. The FMMCP has been updated to reflect this preference and, to maximise meaningful engagement with fishers, the Applicant will continue to seek fishers' engagement preferences, noting they may change over the lifetime of the Project.	Fishers' communication preferences have been acknowledged and incorporated into the FMMCP, as outlined in Section 5.3 .	Consensus was reached, no divergence.
March 2026	Fishers consultation on draft FMMCP (circulation for comment, up to ~1 month)	Commitment made to share the draft FMMCP for fishers' comment pre-consent, with an understanding it can be updated prior to construction. Consultation will allow fishers to review draft FMMCP in full and provide advice and feedback on specific parts or as a whole.	No comments received at the time of writing (May 2026).	N/A

Table A.2 Feedback and comments received on the FMMCP and how these have been addressed within the FMMCP

Date and stakeholder	Stakeholder comment	Applicant's response
24 March 2026, Scottish Fishermen's Federation (SFF)	<p>1. FLOWW references</p> <p>The December meeting included a clear agreement that the FMMCP would not rely on FLOWW guidance. However, the current draft still embeds FLOWW as a central operational framework:</p> <p>Section 1.3 states: "The Applicant will follow the FLOWW 2025 guidance."</p>	<p>The Applicant notes SFF's position in relation to FLOWW and acknowledges the concerns raised regarding its status and endorsement in the Scottish context. In response, the FMMCP has been amended so that FLOWW is no longer presented as a mandatory operational basis in Section 1.3 or Table 3.1 (Mitigation Item M21). Instead, the FMMCP relies on Project-specific procedures, informed by</p>



Date and stakeholder	Stakeholder comment	Applicant's response
	<p>Table 3.1 (M-21) commits to “Adherence to FLOWW in the event of interactions...”</p> <p>SFF’s position remains that reliance on FLOWW Guidance is not appropriate. SFF and its constituent associations have formally withdrawn from FLOWW which was communicated. FLOWW has no statutory or policy status in Scotland and carries no endorsement from Scottish fleets. Retaining it risks embedding a framework that the affected sector does not recognise or support, which in turn undermines the procedural adequacy of the FMMCP. We strongly suggest that FLOWW be removed as an operational basis and replaced with project specific, Scottish appropriate procedures and neutral non-FLOWW based mechanisms for dispute resolution and liaison.</p>	<p>relevant Scottish guidance, established industry good practice and stakeholder consultation.</p> <p>However, the Applicant also notes that FLOWW remains one of the currently available sources of industry guidance relevant to offshore wind and fisheries interactions. The Applicant will continue to have regard to such guidance where relevant and appropriate, while recognising that SFF and its constituent associations no longer endorse FLOWW. The intention of the revised drafting is therefore to ensure that the FMMCP is not dependent on FLOWW as its governing framework and instead provides a Project-specific and Scottish-appropriate basis for liaison, mitigation and dispute resolution.</p>
<p>24 March 2026, SFF</p>	<p>2. Assumption that fishing will resume in the WDA</p> <p>Monitoring objective in Section 4.1 “The key objective... is to validate the assumption of the EIA that fishing will resume within the WDA.”</p> <p>While we recognise that current fishing activity within the WDA appears limited, the wording explicitly embeds an assumption of long-term coexistence within a 144 WTGs with fixed foundation array covering nearly 400 km². SFF cannot accept “resumption” as a baseline assumption when no evidence is provided that mobile gears can safely operate inside the array footprint, irrespective of current levels of activity. This assumption should therefore be reframed as the SPR’s position, not an accepted baseline or industry expectation.</p>	<p>The Applicant acknowledges the point raised and agrees that the wording should not imply that resumption of fishing within the WDA is an agreed industry position or that gear types not currently active within the WDA are expected to operate there in future.</p> <p>In response, Section 4.1 has been revised so that monitoring is framed to assess whether fishing activity resumes within or adjacent to the WDA, by gear type, with reference to the existing baseline of activity. This is intended to reflect current patterns of fishing activity, rather than to assume that gear types not already active within the WDA will become operational within the array area. The EIA assumption will therefore be presented as the Applicant’s assessment, rather than as an agreed baseline or industry expectation.</p> <p>The Applicant also notes that the scope and duration of monitoring beyond the early O&M period will be reviewed with MD-LOT and relevant stakeholders through the benchmarking process, in accordance with Scottish monitoring guidance.</p>
<p>24 March 2026, SFF</p>	<p>3. Coexistence assumptions lack evidence</p> <p>Section 3.1 of the draft FMMCP expresses an intention to “facilitate coexistence wherever possible,” but provides no technical evidence to demonstrate that commercial fishing particularly mobile gears could safely operate within the</p>	<p>The FMMCP has been revised to avoid implying that coexistence is assured and acknowledges gear-specific uncertainty and constraints. However, the plan remains proportionate to the WDA baseline and assessed receptors, which do not indicate overlap for mobile gears within the WDA.</p>

Date and stakeholder	Stakeholder comment	Applicant's response
	<p>proposed footprint. The FMMCP does not assess or address how demersal trawl, seine, dredge or even potting fleets would interact with:</p> <ul style="list-style-type: none"> Rock-protected cables Cable crossings Scour protection High-intensity vessel traffic during O&M Turbine spacing and array layout constraints <p>Given the scale and design of the MachairWind project, these elements represent material and long-term barriers to access for multiple fishing methods. Simply asserting coexistence without analysing these factors risks presenting an outcome that is not technically deliverable. SFF's position is that the FMMCP should acknowledge that coexistence cannot be assumed in the absence of clear, evidence-based analysis. The FMMCP should reflect the uncertainties and risks associated with fishing activity inside the array rather than presenting coexistence as an expected or likely outcome.</p>	<p>The following has been added to Section 3.2 of the FMMCP:</p> <p><i>"The Applicant will seek to facilitate coexistence where reasonably practicable during the construction, O&M and decommissioning phases of the Project, recognising that coexistence cannot be assumed or guaranteed for all gear types. The extent to which fishing activity may continue within or adjacent to the WDA will depend on gear type, the location and nature of Project infrastructure and activities, and relevant safety and operational constraints. The FMMCP therefore recognises that there may be gear-specific constraints and uncertainties and does not present coexistence as an assured outcome. This approach is proportionate to the commercial fisheries baseline and the receptors identified through the EIA, which did not identify material overlap between the WDA and mobile gear activity within the WDA."</i></p>
<p>24 March 2026, SFF</p>	<p>4. OFLO deployment on appropriate vessels</p> <p>The draft FMMCP does not currently commit to placing Offshore Fisheries Liaison Officers (OFLOs) on the vessels where operational decisions are actually made. In Section 5.2, OFLOs are described primarily as a point of contact but there is no requirement for them to be stationed onboard active construction or survey vessels, where real-time liaison is essential. Likewise, Plate 5.1 presents OFLOs within a structure that appears external to the working vessels and it allows for OFLO deployment on guard vessels rather than on the vessels undertaking the activity itself. This is inconsistent with established industry practice. Under long-standing OEUK standards for fisheries liaison, FLOs/OFLOs are expected to be located on the construction or survey vessel carrying out the work as this is the only place where the liaison role can operate effectively, ensure situational awareness and support timely communication with fishing vessels. Assigning OFLOs to guard vessels weakens the liaison function and reduces their ability to identify, prevent or resolve issues as they arise. For these reasons, the FMMCP should be revised to include a clear and explicit</p>	<p>The Applicant acknowledges the importance of locating OFLOs where liaison can be most effective and responsive to live operations. In response, Section 5.2 and Plate 5.1 have been revised to make clear that OFLOs will normally be located on the active construction or survey vessel undertaking the relevant activity. This reflects the Applicant's intention that fisheries liaison should, wherever reasonably practicable, be embedded alongside the operation itself to support situational awareness and timely communication.</p> <p>The revised text also clarifies that placement of an OFLO on a guard vessel would only be used where location on the active construction or survey vessel is not reasonably practicable, and where that approach is justified having regard to the nature of the activity and the practical arrangements for liaison.</p>

Date and stakeholder	Stakeholder comment	Applicant's response
	<p>commitment that OFLOs will be placed on the construction or survey vessel undertaking the relevant activity, with guard-vessel placement used only where it is demonstrably unavoidable.</p>	
<p>24 March 2026, SFF</p>	<p>5. Communication formats lack mandatory specifications</p> <p>The draft FMMCP does not currently provide the level of precision required for operationally safe information sharing. Several sections refer only to providing information in an “accessible format” - for example Table 3.1 (M-19) which states that construction information will be distributed “in an accessible format”. However, “accessible” is not defined and therefore does not provide clarity on what formats will actually be supplied to working fishing vessels. Similarly, while Section 3.5 commits to providing boulder relocation information in GIS/shapefile form, this is the only dataset for which a specific format is defined, and it is not carried through into the communications summary in Table 5.2 The communications table does not include any commitment to provide plotter-compatible formats, nor does it cover the full range of operational hazards that fishermen need to see. For safe and practical use at sea, critical information must be issued in both GIS formats and plotter-ready formats (e.g. TimeZero, .txt, .dxf, .gpx). This applies to all datasets that represent risks to fishing activity, including:</p> <ul style="list-style-type: none"> • Boulder relocations • Cable exposures • Rock placement • Dropped objects • Temporary obstructions • Safety zones • All as-laid cable positions <p>At present, the FMMCP only partially commits to this standard and leaves substantial ambiguity around what formats fishers will actually receive. To ensure information is usable and in line with established practice, we ask that the FMMCP is updated to include a clear, binding commitment to provide all relevant spatial data in:</p>	<p>The Applicant acknowledges the importance of ensuring that spatial information is provided in formats that are practically usable by fishing vessels at sea, as well as by fisheries organisations and wider fleet systems. The draft FMMCP already includes commitments in relation to weekly updates, HorizonWatch, and the provision of GIS/shapefile and plotter-compatible outputs for certain datasets. In response to this comment, those commitments will be extended so that key fishing-relevant hazard datasets are covered more clearly and consistently.</p> <p>The Applicant will therefore revise the FMMCP to make clear that relevant spatial information for key hazards, such as boulder relocations, cable exposures, rock placement, dropped objects, temporary obstructions, safety zones and as-laid cable positions, will be provided in GIS-compatible and plotter-ready formats where appropriate. It is understood that Horizon Watch utilises OLEX, Sodena and Maxsea formats.</p>



Date and stakeholder	Stakeholder comment	Applicant's response
	<p>Plotter-compatible formats (TimeZero/MaxSea/OD/Shipmate; .txt/.dxf/.gpx as applicable), and</p> <p>GIS shapefiles for integration into fleet-wide systems and early-warning platforms.</p> <p>This level of clarity is essential to support safe operations, timely hazard awareness, and accurate integration into vessels' navigation systems.</p>	
<p>24 March 2026, SFF</p>	<p>6. Dropped-object communication omits fishing risk</p> <p>The current wording on dropped object reporting does not adequately reflect the risks faced by fishing vessels. In Table 3.1 (M-24) and the communications summary in Table 5.2, dropped objects are described primarily as navigational hazards. However, this framing overlooks the fact that dropped objects present distinct and significant fishing specific risks, including:</p> <ul style="list-style-type: none"> • Gear snagging • Gear loss or damage • Uncharted seabed obstructions • Entanglement hazards for mobile gears <p>These risks were highlighted during the December meeting, where SFF emphasised that “anything dropped on the seabed is a hazard for fishing” and requested explicit differentiation between navigation and fishing hazards in all notices. To ensure the FMMCP meets Scottish regulatory expectations and is operationally useful to fishing vessels, all dropped-object notifications must explicitly reference fishing related risk pathways, not just navigational safety. This includes updating both the mitigation text and the communications framework to ensure that fishing specific hazards are always identified, described and communicated in formats usable by the fleets affected.</p>	<p>The Applicant notes that the draft FMMCP already recognises that dropped objects may present a fishing risk or fishing hazard, rather than treating them solely as navigational hazards, and also provides for notification and recovery where practicable.</p> <p>As set out in Section 5.3, Table 5.2 states:</p> <p><i>“Should the dropped object pose a fishing risk or fishing hazard, a NtM will be issued once the location, and details of the object can be established. Furthermore, the Applicant will issue a ‘dropped objects’ form to MD-LOT and other relevant stakeholders as required (including the SFF), in the template issued by the MD-LOT, as soon as reasonably practicable following the event. The Applicant will retrieve the dropped object where practicable to do so.”</i></p> <p>The Applicant considers that this wording already captures the need to identify and communicate dropped objects as potential fishing hazards, including in relation to gear interaction risks, and to notify relevant stakeholders accordingly.</p>
<p>24 March 2026, SFF</p>	<p>7. Disruption Agreements limited to WDA construction only</p> <p>The approach to Disruption Agreements in Section 3.5 of the draft FMMCP is too narrow and not sufficiently defined to meet regulatory expectations. The plan limits Disruption Agreements to construction-phase impacts and only where the EIAR identifies “significant impacts,” with no clear commitment to compensate</p>	<p>The Applicant notes the points raised in relation to the scope and drafting of Section 3.5. In response, Section 3.5 has been edited to clarify that, where disruption agreements form part of the committed mitigation, the relevant framework is defined more clearly, including eligibility, evidence requirements, indicative timelines and the approach to alternative dispute resolution. The revised drafting is intended to</p>



Date and stakeholder	Stakeholder comment	Applicant's response
	<p>mobile gear fleets or to address effects arising in the operational phase. This creates several issues.</p> <ul style="list-style-type: none"> • It introduces an artificial separation between impacts within the WDA and those occurring in the ECC. • It does not recognise displacement of mobile gears (trawl, seine, dredge) during array construction, despite these fleets being active in the wider region. • The current wording that SPR “may consider” entering into agreements is non-binding and therefore not a deliverable mitigation measure. • There is no provision for long-term or operational-phase displacement even though fixed foundation array and cable protection measures can restrict access for the full 30–35-year operational life. <p>Under the Marine Works (EIA) Regulations 2017 mitigation must be specific, deliverable and capable of reducing significant effects. Non-binding, discretionary language such as “may consider,” “where practicable,” or “as appropriate” cannot be relied upon to conclude that impacts have been mitigated “as far as practicable.” And under Electricity Works (EIA) (Scotland) Regulations 2017, mitigation measures must be defined at the point of consent. To ensure this FMMCP meets regulatory requirements and reflects the practical realities of fishing activity, SFF asks that Section 3.5 be revised to:</p> <ul style="list-style-type: none"> • Explicitly include mobile-gear fleets (demersal trawl, seine, dredge) as eligible for Disruption Agreements. • Apply to both the WDA and the ECC, in line with how fishing operations interact with the project as a whole. • Cover all project phases: survey, construction, O&M and decommissioning. • Replace discretionary wording with clear commitments, including defined eligibility criteria, evidence requirements and timelines. <p>These changes are necessary to ensure that the Disruption Agreements framework is workable, fair and aligned with both Scottish regulatory expectations and established EIA principles.</p>	<p>ensure that the relevant provisions are set out as a defined mitigation process, rather than in purely discretionary terms.</p> <p>The Applicant also highlights that the FMMCP applies to the WDA and does not extend across the Offshore ECC-to-shore, which will be subject to a separate application and associated assessment and mitigation, as appropriate.</p>
24 March 2026, SFF	<p>8A. Lack of independent/fair dispute resolution</p> <p>The gear-fastening and loss procedures set out in Section 3.4 give the SPR full control over the assessment and determination of claims. The draft process includes no defined timelines, no independent route of arbitration, no appeals</p>	<p>The Applicant notes the importance of ensuring that claims procedures are transparent, time-bound and capable of independent escalation where agreement cannot be reached. The draft FMMCP already provides for independent alternative dispute resolution where mutual</p>

Date and stakeholder	Stakeholder comment	Applicant's response
	<p>mechanism and no external oversight. As written, this structure is not fit for purpose. A fair and credible dispute resolution mechanism particularly where economic loss is at stake must include:</p> <ul style="list-style-type: none"> • An independent arbitrator, not a developer-controlled decision maker • Clear and transparent evidence pathways, including what constitutes sufficient proof • Defined response timelines, so that fishers are not left without clarity • Documented decision rules, ensuring consistent and non-discretionary outcomes • Neutral third-party oversight, to maintain confidence in the process <p>These elements reflect established good practice across other offshore sectors and are essential for a process that fishers can trust. SFF therefore asks that Section 3.4 be revised to incorporate an independent, transparent claims process, ensuring that decisions are not solely controlled by the SPR and that appropriate checks and balances are in place.</p>	<p>agreement is not achieved. However, the Applicant agrees that it would be helpful to provide further clarity on the claims process, including defined timelines, evidence requirements and escalation steps. While it is appropriate for the initial assessment of a claim to be undertaken by the Applicant in the first instance, the Applicant recognises that this process should not remain open-ended or without a clear route to independent resolution. Accordingly, Section 3.5 has been updated to provide additional detail on the ADR process and associated procedural steps.</p>
<p>24 March 2026, SFF</p>	<p>8B. Monitoring commitments too limited</p> <p>The monitoring framework set out in Section 4 of the draft FMMCP is currently too limited to meet Scottish Government good practise expectations for fisheries related monitoring. The draft focuses primarily on landings data and VMS analysis but does not commit to several key components identified in the 2025 Scottish monitoring guidance. In particular, the FMMCP does not provide for:</p> <ul style="list-style-type: none"> • Operational-phase monitoring to understand long-term changes in fishing activity • Gear type specific monitoring, despite distinct interaction pathways for potting, trawl, seine and dredge fleets • Spatially resolved fishing effort analysis, which is needed to detect displacement patterns • Species specific stock monitoring, including where project activities may affect sensitive stocks such as herring <p>Given the scale of the development and the assumptions made about post-construction fishing resuming within the WDA, the monitoring proposed is not sufficient to verify those assumptions or detect changes attributable to the project. SFF's position is that the monitoring commitments in Section 4 should</p>	<p>The Applicant notes that the Scottish guidance does not require monitoring automatically in all cases and considers that monitoring should be objective-led and targeted to the fisheries receptors and interaction pathways identified through the assessment process. In this case, the Applicant's view is that monitoring should be proportionate and gear/fleet specific to those receptors for which relevant impacts have been identified, including in relation to the resumption of fishing activity for the potting fleet. The Applicant also considers that the proposed reporting deliverables from post-consent through post-construction and into the first five years of operation, together with annual reporting, are consistent with a benchmarking and review process. In response to this comment, Section 4 has been updated to state more explicitly that benchmarking and adaptive review will be undertaken, so that the scope and need for ongoing monitoring can be kept under review in light of the evidence obtained.</p>



Date and stakeholder	Stakeholder comment	Applicant's response
	<p>be expanded to align with the Scottish Government 2025 good practice guidance, including appropriate operational phase monitoring, gear-specific analysis, and stock-level monitoring where relevant. These additions are necessary to ensure that monitoring is robust, proportionate, and capable of informing future updates to the FMMCP.</p>	
<p>24 March 2026, SFF</p>	<p>9. Weekly fisheries update omitted</p> <p>The December 2025 meeting included a clear commitment that the FMMCP would incorporate a weekly update to fishing stakeholders with an explicit action recorded for the Project team to add this to the Communication and Engagement section. The minutes note “FNI to add weekly news update point to Communication and Engagement section in FMMCP.” However, the draft FMMCP does not yet include this measure. There is no reference to a weekly fisheries update in Section 5 (Communication) or in the project information summary in Table 5.2 which currently lists NtMs and Weekly Notices of Operations but not the fisher specific weekly update that was agreed.</p>	<p>The Applicant notes that the draft FMMCP already includes provision for a Weekly Notice of Operations in Section 5.3.1 and Table 5.2. This Weekly Notice of Operations is intended to provide a weekly update on operations that are ongoing and/or planned and will be issued prior to construction commencing. For the avoidance of doubt, the Applicant confirms that the term “operations” includes construction activities. The Applicant therefore considers that the weekly fisheries update referred to in the December 2025 meeting is already captured through this measure.</p>
<p>24 March 2026, SFF</p>	<p>10. Governance / existing group vs new CFLG</p> <p>The draft FMMCP establishes a new Commercial Fisheries Liaison Group (CFLG) in Section 5.3 but does not reflect the agreement made during meeting back in December 2025 that the existing group should remain the primary governance forum for MachairWind. The meeting minutes record that “Given the lack of other windfarms in the area there is unlikely to be a need for a formal CFWG to be created and this group should remain as the de-facto CFWG for the Project, “with SPR representatives confirming this approach was acceptable. However, the draft FMMCP does not acknowledge this commitment and instead introduces a newly constituted CFLG without clarifying its relationship to the current group. This risks creating parallel structures. SFF’s position is that Section 5.3 should be amended to explicitly state that the existing fisheries stakeholder group established through ongoing engagement and confirmed at the December meeting will continue as the primary governance mechanism for fisheries liaison throughout the project lifecycle with any formalisation aligning with that structure rather than replacing it.</p>	<p>The Applicant clarifies that the existing fisheries stakeholder forum established through ongoing engagement will continue as the primary MachairWind forum for fisheries liaison, and that the reference to a “CFLG” in the draft FMMCP was not intended to establish a separate or parallel structure. In response to this comment, the Applicant agrees to return to the term Commercial Fisheries Working Group (CFWG), reflecting the existing forum and the approach discussed with stakeholders. The FMMCP has been updated on this basis.</p>



Date and stakeholder	Stakeholder comment	Applicant's response
27 March 2026, Communities Inshore Fisheries Alliance (CIFA) and Clyde Fishermen's Association (CFA)	1. FLOWW For reference CIFA and its national associations are in discussions with the UK FLOWW regarding potential membership. We will consider other potential options too but we are not involved in any other frameworks at the moment. However CIFA will work in good faith with Machair to obtain suitable outcomes for both parties and in particular our fishing members	The Applicant notes this position and welcomes CIFA's commitment to engage in good faith in seeking suitable outcomes for all parties.
27 March 2026, CIFA and CFA	2. Cable routes and seasonality of local fishing As stated in meetings we are just as interested in the Cable routes and would urge consideration of factors such as seasonality of local fishing in respect to the timing of project work.	The Applicant highlights that Section 3.4.2.1 already includes stakeholder engagement in relation to cable routes within the WDA, including seeking fishers' local knowledge of fishing activity, seasonal patterns, gear types and operational constraints to inform route refinement and construction planning. To further address this comment, the FMMCP has been updated to include specific reference to local seasonal fishing patterns.
27 March 2026, CIFA and CFA	3. Involve local fishermen and trusted local people We would always recommend involving local fishermen and those trusted by the local community in the project development. Fisheries observers on survey vessels where possible or in discussions after survey routes where space does not allow.	The Applicant agrees that local knowledge is important. The FMMCP has been updated in Sections 5.2.3 and 5.2.4 to include direct local fisher engagement and the use of local fisheries observers or advisors, where practicable and safe, in relation to the OFLO and Fishing Industry Representative roles.
27 March 2026, CIFA and CFA	4. Prefer localised observers on project vessels during cable laying/digging/protection We would definitely recommend preferably localised observers on project vessels during cable laying/digging and protection etc. In previous projects in our experiences are that issues come when the project leaves the development table and goes to practical routes and protection work. Any way we can help to assist the project going forward for the long-term benefit of both parties, then we are more than happy to do so. Particularly when it comes to advising on ground composition, routes, hazards and suitable protections.	The Applicant appreciates this comment and agrees that local fisheries input can be particularly valuable during practical offshore works, including cable laying, trenching and protection activities. The FMMCP has been updated to support local fisher engagement and local fisheries observers or advisors, where practicable and safe, so that local knowledge can help inform routeing, seabed conditions, hazards and protection measures during Project delivery.
27 March 2026, CIFA and CFA	5. Burial preferred; involve fishers early if mattresses/rock dump are possible; include exposure reporting and rapid remediation. Our preferences are always buried wherever possible, but obviously if any mattresses or rock dump is a possibility we hope to be involved as early as	The Applicant confirms that cable burial is the preferred means of cable protection and that stakeholder engagement on cable burial and protection measures is included in the FMMCP in Section 3.4.2.1 . The FMMCP also includes measures relating to communication of hazards,

Date and stakeholder	Stakeholder comment	Applicant's response
	<p>possible to prevent the loss of ground or potential loss of life re snagging risks etc. In advance of work minimum burial guarantees, fisheries sign-off on protection types and ongoing exposed cable reporting and rapid remediation would be advised through strong lines of communication. A similar process of informing hazards and in relation to dropped objects.</p>	<p>including cable exposure and dropped objects, and recovery or remediation where appropriate.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>6. Guardship should be offered to local boats As in all cases we always recommend guardship is offered to local boats from the area.</p>	<p>The Applicant highlights that the draft FMMCP already confirms that the Project will seek suitably qualified local vessels and crews for guard duties where practicable, as set out in Section 5.2.5.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>7. "Coexistence" and spatial squeeze / loss of grounds Coexistence" is promised — but not guaranteed. Wherever possible we would like to ensure fishing can continue at site locations and cable corridors. Fishing is a legitimate marine use practiced for generations. It is also vital to local coastal socio-economics and national food security. In recent years spatial squeeze has become pronounced for fishermen through cumulative closures and new sectors, therefore we want to be sure that co-existence does not mean more spatial squeeze and long term loss of fishing grounds.</p>	<p>The Applicant notes this position and highlights that the purpose of the FMMCP is to support coexistence between the Project and commercial fisheries, recognising fishing as a legitimate and important long-established marine use. The Applicant also recognises the concerns raised in relation to spatial squeeze and the potential for longer-term loss of access to fishing grounds. Through the FMMCP, the Applicant is seeking, where reasonably practicable, to minimise disruption and support the continuation of fishing activity alongside the Project where this can be achieved safely and appropriately.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>8. Increased marine traffic and harbour-space Increased marine traffic from the construction of the project and its maintenance should be considered in relation to use of harbour space and any potential knock on negative impacts to fishing.</p>	<p>The Applicant notes this position. Decisions on construction and O&M ports are not yet finalised and any relevant interactions with harbour use will be considered as port arrangements are developed.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>9. Cumulative exclusion Cumulative exclusion must be assessed, not just individual zones. If significant disruption is encountered during development work compensation should be discussed in advance across the fleet gear types. Scheduling of projects will be important to minimise impact to seasonal fishing.</p>	<p>The Applicant highlights that cumulative effects, including the potential for cumulative exclusion and disruption to commercial fisheries, have been assessed through the EIA process. That assessment concluded that, with embedded and additional mitigation in place, no residual significant cumulative effects are predicted. The Applicant is committed to delivering Project-specific mitigation through the FMMCP, including disruption agreements where appropriate in relation to disruption to fishing fleets identified through the EIA process. The Applicant also recognises the importance of project scheduling in minimising disruption, particularly in relation to seasonal fishing patterns, and this</p>



Date and stakeholder	Stakeholder comment	Applicant's response
		will continue to be considered through ongoing fisheries engagement and construction planning, where reasonably practicable.
27 March 2026, CIFA and CFA	<p>10. Compensation</p> <p>Regarding compensation when it is appropriate we would argue for inclusion of effort displacement, not just loss. Also a recognition that small vessels without full data records may find it more difficult to prove valid losses.</p>	<p>The Applicant appreciates this position. Section 3.5.2.1 of the FMMCP has been updated to confirm that the CFLO will support vessel owners, where required, in developing a suitable evidence base to support consideration of eligibility for a disruption agreement, including where full documentary evidence is not practicable or possible to obtain.</p> <p>The primary focus is on mitigating the effects of reduced access through project planning, engagement and, where required, additional mitigation via disruption agreements. By seeking to avoid, minimise and mitigate reduced access, the Applicant also aims to minimise the potential for displacement.</p>
27 March 2026, CIFA and CFA	<p>11. Gear-snagging</p> <p>Regarding gear snagging, in many cases the burden of fault cannot be laid just at the fishermen's end. In the past we have found mattressing and rock dump to be in the wrong areas in relation to the data provided, and so a neutral approach to each incident is essential. Also it must be noted that some fishermen may not have received Notices (NtMs, emails, etc, liaison with FIR/FLO.) in realistic timescales or helpful formats depending on the vessel. We will do all we can to help circulate messages when we can as an organisation.</p>	<p>The Applicant agrees that, in the event of gear snagging, loss or damage, it is important that each incident is considered on a neutral, evidence-led basis and not on any presumption of fault on the part of the fisher. The Applicant's position is that each case will be reviewed on its own facts, including consideration of the location of Project infrastructure and protection measures relative to the most up-to-date available installation records, together with any information provided by the claimant and other relevant evidence.</p> <p>We also recognise the importance of timely and accessible communication with fishers. The Applicant will seek to ensure that relevant Notices to Mariners, guard vessel communications and CFLO/FLO liaison are issued as early as reasonably practicable and, where possible, in formats that are helpful and accessible to affected fishers. This will be supported by ongoing, proactive engagement with fisheries organisations and local representatives to help maximise awareness of Project activities and changes on the water.</p>
27 March 2026, CIFA and CFA	<p>12. Independent arbitration</p> <p>We support local working groups being involved in the project in a format local fishermen and the developers feel works best. We do feel where possible these groups may help to provide arbitration, but we also recognise there may be</p>	<p>The Applicant agrees that local working groups can play an important role in providing a practical forum for dialogue, feedback and escalation of fisheries issues during Project development and delivery, in a format that works for both local fishers and the Applicant.</p>

Date and stakeholder	Stakeholder comment	Applicant's response
	<p>instances where independent arbitration overseen by an agreed party makes sense</p>	<p>However, the Applicant considers that formal dispute resolution, including the determination of individual claims, should remain independent and should not be decided by a stakeholder group. Where formal arbitration or dispute resolution is required, this should be undertaken through an appropriate independent process overseen by an agreed party.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>13. Disruption agreements</p> <p>If fishing gear does have to be removed to accommodate the project then operational disruption to fishing and cashflow burdens must be considered. These are generally small scale family businesses with less resilience than large scale companies, and so discussion on requirements and any compensation can be time critical for the survival of the fishing business. Where appropriate payment for time, fuel, and lost fishing opportunity (not just gear handling) should be considered. Mitigation does not mean no impact in many cases.</p>	<p>The Applicant acknowledges that, where static gear must be relocated or removed to accommodate Project activities, the effects may extend beyond the physical handling of the gear itself and may include wider operational disruption. The Applicant therefore agrees that, where evidenced and appropriate, reimbursement should consider the reasonable costs directly associated with gear relocation/removal, including vessel time, fuel and any demonstrable lost fishing opportunity arising from the relocation/removal requirement.</p> <p>Therefore, the following text has been added to Section 3.4.3.2:</p> <p>The reimbursement calculation may, where appropriate, have regard to evidenced and reasonable costs associated with gear relocation or removal.</p>
<p>27 March 2026, CIFA and CFA</p>	<p>14. Monitoring</p> <p>Monitoring of projects and their impacts often looks at data such as Landings data, VMS and port statistics rather than real life impacts. Under 12m boats are often not captured via VMS/AIS and the data pings are not always reflective of fishing. We would always recommend speaking with local boats and associations. We would want to see the realistic capture of lost opportunity, displacement stress and gear conflict. Economic and spatial displacement must be measured directly with Fisher-led impact reporting, inclusion of qualitative evidence (skipper testimony).</p>	<p>The Applicant acknowledges the limitations of relying solely on landings, VMS/AIS and port statistics to understand fisheries activity and potential effects, particularly in relation to smaller inshore vessels and the interpretation of fishing activity from spatial tracking data alone. The Applicant agrees that monitoring should, where reasonably available, draw on a broader range of quantitative and qualitative evidence, including local fisheries knowledge, to help understand potential lost opportunity, displacement, gear conflict and other lived impacts.</p> <p>In response, the Applicant notes that local and fisher-informed evidence is intended to be captured under the existing bullet referring to "other sources of evidence of commercial fisheries activity as may be reasonably available on a regular basis". However, to make this clearer, the Applicant proposes to expand this text to make explicit reference to</p>



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		<p>evidence obtained through engagement with local fishers and fisheries associations, including qualitative information and fisher-led reporting where available. The Applicant also proposes that the list of monitoring evidence should include inshore VMS data, where available, and REM data for scallop vessels, where appropriate and reasonably available.</p> <p>The FMMCP has been updated in Section 4.1:</p> <p>“Collate and analyse other sources of evidence of commercial fisheries activity as may be reasonably available on a regular basis, including <i>information obtained through engagement with local fishers, fisheries associations and the CFLO, and qualitative evidence such as fisher-led impact reporting and skipper testimony, where available.</i>”</p> <p>The FMMCP has been updated in Section 4.1.1 as follows:</p> <ul style="list-style-type: none"> • “<i>Analysis of inshore VMS data, where available;</i> • “<i>Analysis of Remote Electronic Monitoring (REM) systems data for scallop vessels, where available;</i>”
<p>27 March 2026, CIFA and CFA</p>	<p>15. CFLO/OFLO/Fisheries Liaison Group</p> <p>We would support sensible liaison structures with CFLOs, OFLO and Fisheries Liaison Groups as agreed by local stakeholders. We would want these groups carry weight to improve projects for all parties</p>	<p>The Applicant appreciates and supports the value of sensible liaison structures involving the CFLO, OFLO and Fisheries Liaison Groups, developed in a way that reflects what is agreed by local stakeholders. The Applicant considers that such structures can play an important role in helping to identify issues early, improve communication and support better outcomes for all parties.</p> <p>This approach is supported through the FMMCP, which provides the framework for ongoing fisheries liaison and engagement throughout the Project.</p>

