Bowdun Offshore Wind Farm Offshore EIA Report

Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan

TWP-BOW-RPS-ENV-RPT-00026 | April 2026

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Glossary

Defined Term	Definition
Additional Mitigation	Also referred to as secondary mitigation which is defined by The Institute of Sustainability and Environmental Professionals (ISEP) (formerly Institute of Environmental Management and Assessment (IEMA)) as: Actions that will require further activity in order to achieve the anticipated outcome. These may be imposed as part of the planning consent, or through inclusion in the Environmental Impact Assessment (EIA) Report (sic).
Array Area	The Array Area is the area in which the Offshore Generation Assets will be located.
Bowdun Offshore Wind Farm Limited (BOWFL)	A Special Purpose Vehicle (SPV) (legal entity) for the purpose of developing the Project. BOWFL are the Applicant for the Offshore Application.
Commercial Fishing	Any form of fishing activity legally undertaken where the catch is sold for taxable profit.
Demersal Fish	Fish which live and feed on or near the seabed.
Demersal Seine	A seine net is a long net, with or without a bag in the centre, which is set either from the shore or from a boat for surrounding a certain area and is operated with 2 (long) ropes fixed to its ends (for hauling and herding the fish).
Demersal Trawl	A demersal trawl is a cone shaped net that is towed on the seabed to target demersal fish species.
Disruption Agreement	A formal agreement between the Applicant and a fisher that seeks to reduce disturbance or displacement to a fishery caused by the Proposed Development. Disruption Agreements may be supported by monetary payment for demonstrable loss of fishery access or economic disadvantage caused directly to active fishing vessels by disturbance or displacement by the Proposed Development.
Effect	Term used to express the consequence of an impact (i.e. the result of change or changes on specific environmental resources or receptors). The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity of the receptor or resource in accordance with defined significance criteria.
Embedded Mitigation	Measures that are adopted as part of the Proposed Development and therefore assessed within the EIA. The proposed approach for the EIA for the Proposed Development is that Embedded Mitigation includes both primary mitigation and tertiary mitigation. These are defined by the ISEP as follows: Primary: Modifications to the location or design of the development made during the pre-application phase that are an inherent part of the project, and do not require additional action to be taken. Tertiary: Actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects.

Defined Term	Definition
Environmental Impact Assessment (EIA)	Process for the assessment of likely significant environmental effects of a project on the physical, biological and human environment during construction, Operation and Maintenance (O&M) and decommissioning.
Environmental Impact Assessment Regulations (EIA Regulations)	Terminology used in this Offshore EIA Report to refer to three sets of regulations: • The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017; • The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; and • The Marine Works (Environmental Impact Assessment) Regulations 2007.
Export Cable Corridor	The area seaward of Mean High Water Springs (MHWS) which connects the Array Area with the Landfall within which the Offshore Export Cables will be installed.
Gear Type	The method/equipment used for fishing.
Impact	A change caused by an action that occurs during a project's lifetime.
Inter-Array Cables (IAC)	Cables which link the Wind Turbines to each other and with the OSPs.
Interconnector Cables	Cables which will connect individual OSPs to each other to provide redundancy against cable failure elsewhere.
International Council for the Exploration of the Seas (ICES) Statistical Rectangles	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 nm). A number of rectangles are amalgamated to create ICES statistical areas.
Landfall	The area in which the Offshore Export Cables make landfall and is also the transitional area between the Offshore Transmission Assets and the Onshore Transmission Assets. Located in the Intertidal Area at Benholm.
Marine Directorate (MD)	The Marine Directorate of the Scottish Government, formerly known as Marine Scotland. The planning and licensing authority for Scotland's seas and custodian of Scotland's National Marine Plan (NMP). The Marine Directorate - Licensing Operations Team (MD-LOT) are specifically responsible for managing Section 36 Consent and Marine Licence Applications seaward of MHWS.
Mitigation	Measures to avoid, prevent, reduce or control effects on the environment. See also definitions for Embedded Mitigation and Additional Mitigation.
Offshore Environmental Impact Assessment (EIA) Report (hereafter, 'Offshore EIA Report')	Document prepared to report the findings of the EIA for the Proposed Development and produced in accordance with the EIA Regulations. The Offshore EIA Report is submitted to support the Offshore Application for the Proposed Development, and to comply with EIA Regulations.
Offshore Export Cables	Subsea cables used to transmit electricity generated offshore by the Wind Turbines from the OSPs to shore. The Transition Joint Bay (TJB) is the location where the Offshore Export Cables terminate, and the onshore cabling begins.

Defined Term	Definition
Offshore Generation Assets	The infrastructure of the Proposed Development required to generate electricity comprising of the Wind Turbines, Wind Turbine foundations and associated infrastructure (e.g. IACs).
Offshore Infrastructure	All of the Offshore Infrastructure associated with the Proposed Development that is located seaward of MHWS, comprising the Offshore Generation Assets and the Offshore Transmission Assets.
Offshore Substation Platform(s) (OSPs)	OSPs comprise the support structure, topside and electrical components used for collecting and/or converting electricity generated by the Wind Turbines for transmission by the Offshore Export Cables.
Offshore Transmission Assets	The infrastructure of the Proposed Development required to transmit the generated electricity comprising of the OSPs, Offshore Export Cables and associated infrastructure up to MHWS.
Operation and Maintenance (O&M)	The phase of the Proposed Development following completion of construction. This phase of development includes routine inspections, repairs and replacement of infrastructure and equipment (including Interconnector Cables and IACs), Scour Protection replenishment or replacement, major component replacement, painting and/or other coating works, removal of marine growth, and replacement of access ladders.
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 Fish	Fish which live within the water column, not on or near the seabed or at the coasts.
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.
Project (the)	An overarching term for the Bowdun Offshore Wind Farm (Bowdun OWF) comprising the offshore and onshore infrastructure required to generate and transmit electricity from the Array Area to the onshore GCP. The Project includes the Offshore Generation Assets, the Offshore Transmission Assets and the Onshore Transmission Assets.
Proposed Development	Term used to define the Offshore Infrastructure associated with the Project seaward of MHWS for which consent is being sought. Further details of the parameters are included in Volume 1, Chapter 3: Project Description.
Safety Zones	An area extending a maximum of 500 m from the central point of a subsea installation in which other vessels are prohibited from entering, except in circumstances outlined within Section 96 of the Energy Act, 2004.

Defined Term	Definition
Scallop Dredge	A method to catch scallop using steel dredges with a leading bar fitted with a set of spring-loaded, downward pointing teeth. 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 Seine	An encircling net shot in the open sea using very long ropes to lay out the net, and ropes on the seabed prior to towing the net closed and hauling from a boat under its own power.
Scour Protection	Protective materials installed to avoid sediment being eroded away from the base of the foundations and/or buried subsea cable due to the flow of water.
Section 36 Consent	Scottish Ministers' consent under Section 36 of the Electricity Act 1989 required to permit the generation and operation of an energy generation station.
Significance	Effect factor that is determined by the magnitude of impact along with the sensitivity of the receptor.
Study Area	For each environmental topic, the baseline environment will be characterised, and the potential environmental impacts will be described within a topic-specific study area. Specific study areas are defined for each topic and are based on the maximum spatial extent across which potential impacts of the Project may be experienced by the relevant receptors (i.e. Zone of Influence).
Thistle Wind Partners (TWP)	Company established for the development of the Project.
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.
Wind Turbines	Structures comprising of a tubular tower, rotor blades, and a nacelle which houses the Wind Turbine generator.

Acronyms

Acronym	Definition
AtoN	Aid to Navigation
CaP	Cable Plan
CBA	Cable Burial Assessment
CBRA	Cable Burial Risk Assessment
CFWG	Commercial Fisheries Working Group
CMS	Construction Method Statement
COLREGS	The Convention on the International Regulations for Preventing Collisions at Sea
CoP	Construction Programme
CSIP	Cable Specification and Installation Plan
CFLO	Company Fisheries Liaison Officer
DSLP	Development Specification and Layout Plan
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response Cooperation Plan
FIR	Fishing Industry Representative
FLOWW	Fisheries Liaison with Offshore Wind and Wet Renewables group
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
IAC	Inter-Array Cable
ICES	International Council for the Exploration of the Seas
IMO	International Maritime Organization
INNS	Invasive Non-Native Species
KIS-ORCA	Kingfisher Information Service – Offshore Renewable and Cable Awareness
LMP	Lighting and Marking Plan
MCA	Maritime & Coastguard Agency
MD-LOT	Marine Directorate-Licensing Operations Team
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MMMP	Marine Mammal Mitigation Plan
MPCP	Marine Pollution Contingency Plan
N&EC RIFG	North and East Coast Regional Inshore Fishery Group
NLB	Northern Lighthouse Board
NSVMP	Navigational Safety and Vessel Management Plan
NtM	Notice to Mariners
O&M	Operation and Maintenance
OFLO	Offshore Fisheries Liaison Officer
OMP	Operation and Maintenance Plan

Acronym	Definition
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
PEMP	Project Environmental Monitoring Plan
SFF	Scottish Fishermen's Federation
SOLAS	The International Convention for the Safety of Life at Sea
SPFA	Scottish Pelagic Fisherman's Association
SWFPA	Scottish White Fish Producers Association
TWP	Thistle Wind Partners Limited
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
VHF	Very High Frequency
VMS	Vessel Monitoring System

Table of Units

Units	Definition
GW	Gigawatts
km	Kilometre
km^2	Square kilometre

1 Introduction

1.1 Overview of the Proposed Development

1.1.1 Bowdun Offshore Wind Farm Limited (hereafter referred to as the 'Developer') is proposing to develop the Bowdun Offshore Wind Farm (OWF) (hereafter referred to as the 'Project'), an estimated 1 GW capacity OWF with its Array Area located approximately 44 km east of Stonehaven, covering an area of 187 km^2. The Project is made up of both offshore and onshore components. The subject of this Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) is the Offshore Infrastructure of the Project seaward of Mean High Water Springs (MHWS), which is hereafter referred to as 'the Proposed Development'.

1.1.2 The Offshore Infrastructure of the Proposed Development includes Wind Turbines and associated fixed bottom foundations, the Offshore Substation Platforms (OSPs) and associated fixed bottom foundations, the Inter-Array Cables (IACs), Interconnector Cables, Offshore Export Cables and Scour Protection, cable protection and utility crossings. The Proposed Development, together with the Local and Regional Commercial Fisheries Study Areas used for the Environmental Impact Assessment (EIA) are presented in Figure 1.1.

1.1.3 The Proposed Development infrastructure of relevance to this FMMCP includes the following components:

- up to 67 Wind Turbines (each comprised of three rotor blades, a nacelle housing the generating unit, hub, and tower section) and associated fixed bottom foundations;
- a network of up to 151 km of IACs;
- up to 36 km of Interconnector Cables;
- up to three OSPs with fixed bottom foundations and supporting infrastructure including scour protection (as required);
- up to three Offshore Export Cables, each of approximately 70 km in length and totalling approximately 210 km in length, making landfall near Benholm on the Aberdeenshire coast; and
- Scour Protection, cable protection and utility crossings where required.

1.1.4 Main offshore construction works will take place within a five-year period and the Proposed Development will have an operational lifetime of up to 30 years.

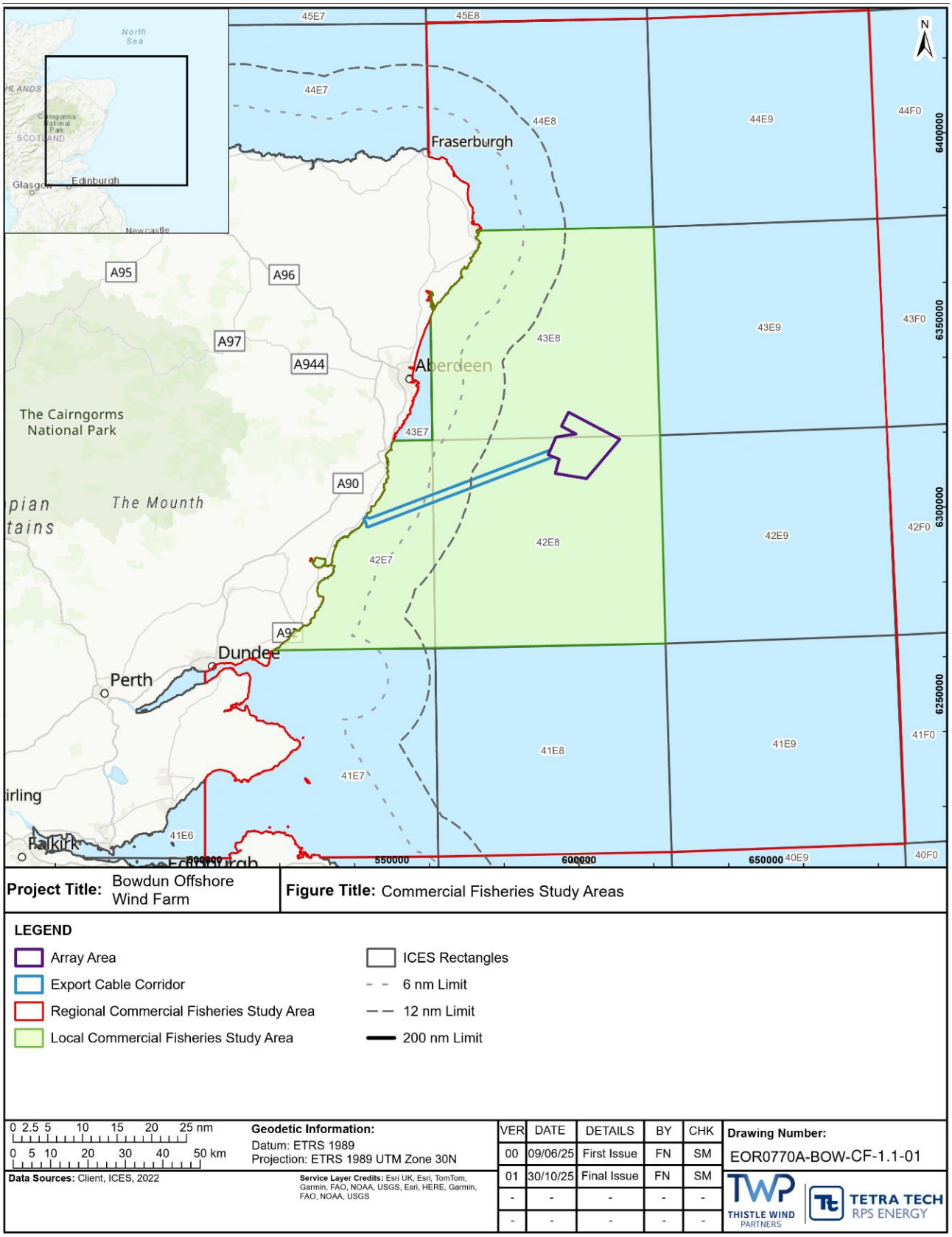

Figure 1.1: Commercial Fisheries Study Areas

1.2 Document Structure

1.2.1 This Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) has been structured as outlined in Table 1.1.

Table 1.1: FMMCP document structure

Section	Summary of Content
Section 1: Introduction	Identifies the scope of the FMMCP and provides an overview of the Proposed Development
Section 2: Fisheries Overview	Provides an overview of fishing activity in the Site Boundary, including a summary of the impacts on commercial fisheries and fish and shellfish stocks.
Section 3: Mitigation[1]	Sets out the Developer's approach to mitigation, focused on enabling coexistence.
Section 4: Monitoring	Sets out the Developer's approach to monitoring fisheries activity in response to the Proposed Development.
Section 5: Communication	Sets out the Developer's approach to communication with the fishing industry and other relevant stakeholders.
Annex A: Summary of Stakeholder Engagement	Provides a summary of stakeholder engagement carried out in relation to the FMMCP.

1.3 Purpose of this Document

1.3.1 This FMMCP aims to document and demonstrate how the Developer will liaise and co-exist with the commercial fishing industry active in and around the Proposed Development and deliver commitments to mitigation and monitoring, which are intended to avoid or reduce potential impacts of the Proposed Development on the commercial fishing industry.

1.3.2 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 Proposed Development;
- describe the approach to fisheries liaison, identifying how communication between the Developer and the fishing industry will take place and confirming liaison roles and responsibilities; and

[1] Section 3 will present both the Embedded and Additional Mitigation that is set out in Volume 2, Chapter 13: Commercial Fisheries

- set out procedures to manage interactions between the Developer and the fishing industry, including procedures relating to Disruption Agreements and associated payments, to gear loss and gear relocation or removal.

1.3.3 The Developer regards coexistence as the joint presence of both industries, working together within and around the Proposed Development and believes that application of measures set out in this FMMCP support opportunities for coexistence.

1.3.4 The success of the FMMCP in helping to deliver coexistence will require constructive and effective communication between the Developer and the fishing industry and the support and engagement of both parties.

1.3.5 This FMMCP covers all phases of the Proposed Development. Where required, the FMMCP will be updated 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 (as amended).

1.4 Relevant Guidance

1.4.1 This FMMCP has been developed having regard to current Scottish Government and Marine Directorate guidance relevant to fisheries mitigation, monitoring and liaison in the context of offshore renewable energy developments. Relevant guidance includes:

- 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 wind farms - monitoring impacts on the commercial fishing industry: good practice guidance (Scottish Government, 2025); and
- Fisheries Liaison with Offshore Wind and Wet Renewables group (FLOWW) Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments (FLOWW, 2025).

1.4.2 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). Engagement to date with fisheries stakeholders and fishermen has also informed the development of this document (see Annex A).

1.4.3 It is noted that established fisheries liaison best practice has historically been developed through the Fisheries Liaison with Offshore Wind and Wet Renewables group (FLOWW). The Scottish Fishermen's Federation (SFF) and its affiliated Associations have withdrawn from the FLOWW process and do not currently endorse that guidance. No alternative SFF-endorsed fisheries liaison guidance is presently available.

1.4.4 In preparing this FMMCP, the Developer has had regard to established fisheries liaison good practice as reflected within current Marine Directorate guidance and industry practice to date. The fisheries liaison, mitigation, monitoring and communication procedures relevant to the Proposed Development are set out directly within this FMMCP, rather than through reliance on cross-reference to external guidance, in order to provide clarity and transparency.

1.4.5 Should new or replacement Scottish-specific fisheries liaison guidance be issued during the lifetime of the Proposed Development, the FMMCP will be reviewed and updated as appropriate.

1.5 Relevant Policy

1.5.1 Marine Directorate guidance (Marine Directorate, 2025) requests that the FMMCP should be in accordance with the National Marine Plan (Scottish Government, 2015). Relevant policy provisions of the NMP are set out in Table 1.2.

Table 1.2: Summary of Scotland's NMP Relevant to the FMMCP

Summary of relevant policy	How and where considered in this FMMCP
Contains sector-specific policies relevant to offshore wind and commercial fisheries. Policies under Chapter 4 General Policies are of relevance to commercial fisheries, specifically GEN 4 which encourages proposals to enable coexistence and developments that do not result in areas being unsuitable for future use by others.	Reflecting the desire for coexistence, this FMMCP sets out Developer commitments intended to reduce any effects of the Proposed Development on commercial fishing activity. It also sets out a liaison framework that is intended to enable ongoing communication and collaboration between the Developer and the commercial fishing industry.
Policies under Chapter 6 Sea Fisheries ('FISHERIES 1 – 5') are considered relevant to commercial fisheries. Policies seek to safeguard existing fishing opportunities and activities wherever possible and advise that mechanisms for managing conflicts between the fishing sector and other users of the marine environment should be in place. (FISHERIES 1) Preparation of a Fisheries Management and Mitigation Strategy (FMMS) is recommended where existing fishing opportunities and activity cannot be safeguarded (FISHERIES 3). Chapter 6 Sea Fisheries provides principles for interactions with other users (paragraph 6.22), including short-term displacement of fishing during installation, potential damage to fishing equipment and following best practice guidance (paragraph 6.26).	The FMMCP (previously referred to as FMMS in the NMP) sets out measures to mitigate any constraints that the Proposed Development may place on commercial fishing activity.

1.6 Consents and Licences

1.6.1 The following consents and licences are required for the Proposed Development, 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 MW (outwith 12 nm). This consent applies to the Wind Turbines, Wind Turbine foundations, IACs, Interconnector Cables, scour and cable protection associated with these assets; and
- Marine Licences under the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010 are required for construction or deposition in or over the sea, or on and under the seabed. Marine Licences for Proposed Development are being sought for the:
  - Offshore Generation Assets including foundations, Wind Turbines, IACs, Interconnector Cables and the scour and cable protection associated with these assets; and
  - Offshore Transmission Assets including the OSPs, Offshore Export Cables and the scour and cable protection associated with these assets.

1.7 Linkages with Other Consent Management Plans

1.7.1 This FMMCP sets out specific procedures relating to the mitigation of effects on commercial fisheries, the Developer'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 Proposed Development.

1.7.2 A summary of consistency and linkage of the FMMCP with other consent management plans is provided in Table 1.3. The intention is not to duplicate the same information across several consent management plans, hence linkages are identified here.

Table 1.3: FMMCP Consistency with and Links to Other Consent Management Plans

Consent Management Plan	Consistency With and Linkage To FMMCP
Aids to Navigation (AtoN) Management Plan	Provides details of the AtoN, including maintenance and repair of AtoN, associated with the Proposed Development.
Development Specification and Layout Plan (DSLP)	Sets out the final design and layout parameters associated with the Proposed Development.
Environmental Management Plan (EMP)	Sets out the environmental management framework for the construction and Operation and Maintenance (O&M) of the Proposed Development. Of relevance to the FMMCP, it confirms the role of the Fisheries Liaison Officer (FLO) 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 Proposed Development during construction and O&M. Of relevance to the FMMCP, it confirms how the Proposed Development will be marked and lit in terms of aiding safe marine navigation.
Cable Installation Specification Plan (CSIP)	Provides details on cable specifications, routing, installation method and protection. Of relevance to the FMMCP it confirms cable burial and protection details.
Cable Plan (CaP)	Provides details on how cable works comply with regulatory and licence requirements.
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 O&M of the Proposed Development. 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 Proposed Development. Of relevance to the FMMCP, it confirms when offshore works will commence and cease.
Project Environmental Monitoring Programme (PEMP)	Provides details of the environmental monitoring to be undertaken in relation the Proposed Development.
Piling Strategy	Provides details on any piling activity to be undertaken during construction of the Proposed Development, and measures to mitigate the potential environmental effects – including on fish and shellfish stocks - of piling.

2 Fisheries Overview

2.1 Fisheries Activity Within the Site Boundary

2.1.1 This FMMCP has been informed by the data collected to support the Offshore EIA Report (Section 13.5, Volume 2, Chapter 13: Commercial Fisheries), together with subsequent engagement with commercial fisheries industry stakeholders. Information on fishing activity presented in the Offshore EIA Report is not repeated in full here, though a summary is provided.

2.1.2 Commercial fishing activity within the vicinity of the Proposed Development comprises a mix of static and mobile gear fisheries, including potting, scallop dredge, demersal trawl and demersal seine, pelagic trawl and handline fleets. Table 2.1 identifies the fishing fleets with which the Proposed Development may interact. Reference is also included to the Array Area and the Export Cable Corridor to capture fleets working in both inshore and offshore waters.

Table 2.1: Commercial Fishing Fleets Relevant to the Proposed Development

Fishing Fleet	Array Area	Export Cable Corridor
UK fishing fleets		
UK potting	Scottish registered vessels, under and over 10 m length, targeting brown crab *Cancer pagurus* and other shellfish – no/very low levels of activity in the Array Area.	Scottish registered vessels, under and over 10 m length, targeting brown crab and other shellfish – variable levels of activity across discrete sections of the Export Cable Corridor.
UK scallop dredge	Primarily Scottish registered vessels, over 15 m length, targeting king scallop *Pecten maximus* – low levels of activity in the Array Area.	Primarily Scottish registered vessels, over 15 m length, targeting king scallop – high levels of activity across discrete sections of the Export Cable Corridor.
UK demersal trawl	Primarily Scottish registered vessels, over 15 m length, targeting haddock *Melanogrammus aeglefinus* – no activity within the Array Area but present in the wider Local and Regional Commercial Fisheries Study Areas.	Primarily Scottish registered vessels, under and over 15 m length, targeting Nephrops *Nephrops norvegicus* and squid *Loligo* spp. – some activity across discrete sections of the Export Cable Corridor inside of 6 nm limit.
UK demersal seine	Primarily Scottish registered vessels, over 15 m length, targeting haddock – no activity within the Array Area but present in the wider Local and Regional Commercial Fisheries Study Area.	No activity.
UK handline/gear with hooks	No activity.	Scottish registered vessels, under 12 m length, targeting mackerel *Scomber scombrus* – potential for activity across nearshore section of the Export Cable Corridor.
UK pelagic trawl	Scottish registered vessels, over 40 m length, targeting herring *Clupea harengus harengus* – no activity within the Array Area but	Scottish registered vessels, over 40 m length, targeting herring – no activity within the Export Cable Corridor but present in the wider

Fishing Fleet	Array Area	Export Cable Corridor
	present in the wider Local and Regional Commercial Fisheries Study Areas.	Local and Regional Commercial Fisheries Study Areas.
Non-UK fishing fleets		
EU pelagic trawl	Highly sporadic landings of herring and mackerel by vessels registered in Ireland, Denmark, Netherlands, Germany and France. Very unlikely to be active within the Array Area but may be present in the wider Regional Commercial Fisheries Study Area.	Highly sporadic landings of herring and mackerel by vessels registered in Ireland, Denmark, Netherlands, Germany and France. Very unlikely to be active within the Export Cable Corridor but may be present in the wider Regional Commercial Fisheries Study Area.

2.2 Summary of Impacts

2.2.1 Potential impacts of the Proposed Development on commercial fisheries are assessed in the Offshore EIA Report. The following potential impacts, applicable through the construction, O&M, and decommissioning phases of the Proposed Development, have been assessed:

- reduction in access to, or exclusion from established fishing grounds within the Array Area;
- reduction in access to, or exclusion from established fishing grounds within the Export Cable Corridor;
- displacement leading to gear conflict and increased fishing pressure on adjacent grounds;
- disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity;
- increased vessel traffic associated with the Proposed Development within fishing grounds leading to interference with fishing activity;
- additional steaming to alternative fishing grounds for vessels that would otherwise fish within the Proposed Development; and
- increased snagging risk, which could result in loss or damage to fishing gear.

2.2.2 Cumulative effects arising from the Proposed Development in combination with other offshore wind developments and marine activities have also been assessed within the Offshore EIA Report (Volume 2, Chapter 13: Commercial Fisheries.

2.2.3 The conclusions of the impact assessment are presented in Volume 2, Chapter 13: Commercial Fisheries of the Offshore EIA Report (available at: Bowdun Offshore Wind Farm | marine.gov.scot). Assessment outcomes are not duplicated in this FMMCP.

2.3 Fisheries Stakeholders and Engagement

2.3.1 The Developer has undertaken consultation with fisheries stakeholders in relation to the Proposed Development since 2023. A summary of consultation undertaken prior to submission of the Application, including in relation to the development of this FMMCP, is provided in Section 13.4, Volume 2, Chapter 13: Commercial Fisheries of the Offshore EIA Report and is not duplicated here.

2.3.2 Fisheries stakeholders include the following:

- SFF;
- Scottish White Fish Producers Association (SWFPA);
- Scottish Pelagic Fishermen's Association (SPFA); and
- North and East Coast Regional Inshore Fisheries Group (N&EC RIFG).

2.3.3 Engagement with local fishermen has primarily been direct with the Developer and their Fisheries Liaison Officer (FLO), who has been in this post since 2023 and who has made regular port visits to engage with fishermen active in the Site Boundary. It is envisaged that this form of engagement with local fishermen will be ongoing throughout the lifetime of the Proposed Development.

3 Mitigation

3.1 Overview

3.1.1 It is the intention of the Developer to facilitate coexistence wherever possible during all phases of the Proposed Development which will include the implementation of mitigation strategies to reduce the overall impacts of the Proposed Development.

3.1.2 This section of the document presents measures, in addition to fisheries liaison (see Section 5), that will be put in place by the Developer to promote coexistence between the Proposed Development and fishing activity.

3.2 Principles of Mitigation

3.2.1 The Developer will adhere to the principles set out immediately below. These principles are aligned with established fisheries liaison good practice as applied within the offshore wind sector:

- the Developer will implement measures to reduce and mitigate as far as practicable, potential impacts to commercial fishers during the lifetime of the Proposed Development;
- the Developer will apply advisory safety distances during works that are appropriately sized and limited in duration, having regard to safety requirements and practical considerations, and will avoid imposing distances that are unnecessarily large or prolonged;
- safe working practices underpinned by appropriate safety management systems are expected from all vessels undertaking operations related to the Proposed Development. Vessels employed by the Developer will only undertake activities prescribed in their line of work;
- the Developer will provide local fishers with procedures for registering claims for loss of/damage to fishing gear resulting from offshore works associated with the Proposed Development construction activities and during the O&M phase of the Proposed Development; and
- vessels involved in the construction, and O&M of the Proposed Development, including guard vessels and construction vessels, will be provided with the relevant lines of communication (as outlined within this FMMCP) to reduce disruption to commercial fishing vessels undertaking their normal activities.

3.3 Embedded Mitigation

3.3.1 As part of the design process, a number of Embedded Mitigation measures were provided within the Offshore EIA Report. The commitments that are relevant to commercial fisheries and the FMMCP are described in Table 3.1 and demonstrate that the FMMCP is in compliance with the Offshore Application.

Table 3.1: Embedded Mitigation Measures of Relevance to Commercial Fisheries

ID	Embedded Mitigation Adopted as Part of the Proposed Development	How Commitment is Secured
1	Development of, and adherence to, a Cable Specification and Installation Plan (CSIP) post-consent.	Secured in the Section 36 Consent and Marine Licences, via the requirement for a CSIP
2	Use of anti-corrosion protective coatings and Scour Protection where there is potential for scour to develop around the Offshore Infrastructure, and it is appropriate to do so.	Secured in the Section 36 Consent and Marine Licences, via the Scour Management Plan
3	Development of, and adherence to, a Piling Strategy. This will detail use of Acoustic Deterrent Devices (ADDs), slow start, soft start, and ramp up procedures, as appropriate, as well as any Additional Mitigation measures, where determined to be required, in consultation with stakeholders including NatureScot and Marine Directorate-Licensing Operations Team (MD-LOT).	Secured in the Section 36 Consent and Marine Licences, via the Piling Strategy
4	Development of, and adherence to, a Cable Burial Risk Assessment (CBRA) and the Cable Burial Assessment (CBA). Implementation, management and monitoring of cable protection, via burial or external protection where adequate burial depth is not feasible, will be undertaken as informed by these assessments. Results of these assessments, and commitments to post construction monitoring, will be provided in the Cable Plan (CaP).	Secured in the Section 36 Consent and Marine Licences, via the CBRA. CBA and CaP.
5	Development of and adherence to an Environmental Management Plan (EMP), including a Marine Pollution Contingency Plan (MPCP) and a Biosecurity Plan with commitments to monitoring and actions to minimise Invasive Non-Native Species (INNS).	Secured in the Section 36 Consent and Marine Licences, via the requirement for an EMP, MPCP and Biosecurity Plan.
7	Development of, and adherence to a Construction Method Statement (CMS) along with a Code of Construction Practice.	Secured in the Section 36 Consent and Marine Licences, via the requirement for a CMS.
8	All relevant Health and Safety Executive procedures will be followed.	Required in accordance with relevant health and safety legislation.
9	Development of, and adherence to, a combined Navigational Safety and Vessel Management Plan (NSVMP), describing Project vessels' requirements, passages, monitoring and controls.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an NSVMP
10	Development of, and adherence to, a Fisheries Mitigation, Monitoring and Communication Plan (FMMCP). The FMMCP includes details of the measures which are proposed to be implemented to reduce impacts on commercial fishing, the approach to monitoring fisheries activity and the approach to fisheries liaison and procedures to manage interactions between the Proposed Development and the fishing industry.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP
11	Appointment of a Company Fisheries Liaison Officer (CFLO). The CFLO will support ongoing liaison and	Secured in the Section 36 Consent and Marine Licences,

ID	Embedded Mitigation Adopted as Part of the Proposed Development	How Commitment is Secured
	ensure clear communication between the Developer and commercial fishers.	via the requirement for an FMMCP appointment
12	Advance warning and accurate location details of planned operations, associated Safety Zones and advisory passing distances will be given via NtMs and Kingfisher Bulletins.	Secured in the Section 36 Consent and Marine Licences, via the requirement for advance warnings
13	Development of and adherence to a Lighting and Marking Plan (LMP). The LMP will confirm compliance with legal requirements with regards to shipping, navigation and aviation marking and lighting.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an LMP
14	Adherence to best practice guidance with regards to fisheries liaison and procedures in the event of interactions between the Proposed Development and fishing activities (e.g. 2025).	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP
15	Participation in relevant commercial fisheries working group.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP
16	Application for and use of Safety Zones of up to 500 m during construction, major maintenance, and decommissioning phases. Advisory safe passing distances of up to 500 m will also be applied for mobile installation vessels.	Secured via an application for Safety Zones prior to construction commencing.
17	Any objects dropped on the seabed during works associated with the Proposed Development will be reported in line with MD-LOT procedures and objects will be recovered where they pose a hazard to other marine users and where recovery is possible.	Secured in the Section 36 Consent and Marine Licences, via the Dropped Object Procedure detailed in EMP
18	All vessels working on the Proposed Development will meet the required certification standards and carriage requirements along with following international marine regulations.	Secured in the Section 36 Consent and Marine Licences, via the requirement for a NSVMP
20	Suitable Aids to Navigation (AtoN) lighting and marking of the Proposed Development including construction buoyage and the use of a Cable Marker Board shall be implemented complying with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) Recommendations G1162 (IALA, 2021), to be finalised and approved in consultation with the Maritime and Coastguard Agency (MCA) and Northern Lighthouse Board (NLB) through a LMP.	International Association of marine AtoN and Lighthouse Authorities (IALA) Recommendations G1162
22	Development of, and adherence to, an Emergency Response Cooperation Plan (ERCoP) in consultation with the Maritime & Coastguard Agency (MCA).	Secured in the Section 36 Consent and Marine Licences, via the requirement for an ERCoP
23	Development and adherence to an O&M Programme (OMP) in conjunction with approved post-consent construction plans.	Secured in the Section 36 Consent and Marine Licences
24	Development of, and adherence to, a Development Specification and Layout Plan (DSLP). The development of the DSLP includes consultation with the relevant	Secured in the Section 36 Consent and Marine Licences and the requirement for a DSLP

ID	Embedded Mitigation Adopted as Part of the Proposed Development	How Commitment is Secured
	authorities for approval, including the MCA and Northern Lighthouse Board (NLB).	
34	Drafting and implementation of a Decommissioning Programme, prepared in accordance with requirements of the Energy Act 2004, which will set out the extent of infrastructure to be removed as well as the methods and processes which will be used.	Secured in the Section 36 Consent and Marine Licences, via the requirement for a decommissioning programme.
40	Creation of a Waste Management Plan (WMP), which will describe the processes for handling and managing any waste materials.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an EMP and WMP.
41	The Proposed Development will be marked on Admiralty charts including an appropriate chart note.	Secured in the Section 36 Consent and Marine Licences
42	Compliance of project vessels with international marine regulations as adopted by the Flag State, including COLREGS (IMO, 1972) and SOLAS (IMO, 1974).	Secured in the Section 36 Consent and Marine Licences
48	Where boulder removal is required during site preparation, the location of large boulders that are relocated and may pose a snagging risk for fishing gear, will be disclosed to the fishing industry within a timely manner and in an accessible format.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP
49	Where appropriate, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances to mitigate any impact which poses risk to surface navigation during construction, O&M and decommissioning phases. Such impacts may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards.	Secured in the Section 36 Consent and Marine Licences
50	MGN 654 Annex 4 (MCA, 2021) requires that hydrographic surveys will fulfil the requirements of the IHO Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager and the UKHO.	Secured in the Section 36 Consent and Marine Licences
54	Development of, and adherence to, a Project Environmental Monitoring Plan (PEMP) to include details of any agreed surveys or monitoring requirements. The PEMP will provide the mechanism to validate the impact assessment, assess the effectiveness of mitigation measures, and inform adaptation of mitigation measures throughout the construction and O&M phases of the Proposed Development.	Secured in the Section 36 Consent and Marine Licences, via the requirement for a PEMP
55	The Developer will enter into Disruption Agreements, where appropriate, to mitigate justifiable disturbance to fishing activity experienced through temporary loss of access due to offshore works associated with the Proposed Development. Agreements will be evidence-based and implemented where demonstrable disruption to fishing activity occurs.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP See text beneath this table for detail.

3.4 Disruption Agreements

Rationale for the Application of Disruption Agreements

3.4.1 The Developer is committed to mitigating justifiable disturbance experienced by fishers through loss of access due to construction activities.

3.4.2 The Developer will enter commercial Disruption Agreements with fishers in relation to the Export Cable Corridor, where there is evidenced construction phase temporary disruption to fishers. The current scope reflects the outcomes of the impact assessment as reported in the Offshore EIA Report, which identified that fishing activity is relatively more concentrated within the Export Cable Corridor and that temporary access restrictions are most likely to arise during cable installation works. On the basis of the current evidence base, Disruption Agreements are expected to apply to the potting and scallop dredge fisheries, which demonstrate the clearest spatial interaction within sections of the Export Cable Corridor. The applicability of Disruption Agreements to specific fleets takes into account the degree of spatial interaction with construction activities within the Export Cable Corridor and the operational characteristics of the fishery. For fisheries with more limited interaction with the Export Cable Corridor and greater operational flexibility to redistribute effort within their normal fishing range, Disruption Agreements are not considered necessary. Fishing activity patterns may evolve over time, and the implementation of Disruption Agreements will therefore remain responsive to evidence of construction-phase disruption where this can be demonstrated.

3.4.3 Evidence-based Disruption Agreements with fishers shall only be implemented as a last resort where residual impacts persist despite the application of all other reasonable Embedded Mitigation measures.

3.4.4 Disruption Agreements will adhere to the well-established principles as per existing good practice guidance, and existing Developer procedures. Disruption Agreements shall include protocols for how the parties (i.e. the Developer and the affected fisher) will act during the construction period and, where supported by an appropriate evidence base, a mechanism for payments designed to ensure that affected fishers are neither worse nor better off as a result of Proposed Development activities.

3.4.5 Disruption Agreement payments will only be established based on justifiable claims to achieve a position whereby fishing interests are neither advantaged nor disadvantaged. Affected fishermen will be required to provide evidence to corroborate any disruption claims. Payments will be considered for justifiable claims submitted by individuals only, ensuring that those who are impacted will receive fair payment in line with potential financial losses; the Developer will not consider association agreements.

3.4.6 If mutual agreement cannot be reached, both parties should seek to undertake Alternative Dispute Resolution in accordance with recognised good practice principles for dispute resolution within the offshore wind and commercial fisheries context.

3.4.7 This Developer commitment to Disruption Agreements is considered as Embedded Mitigation. Disruption Agreements are broadly acknowledged to be an appropriate and pragmatic mechanism for mitigating short-term and temporary loss of access impacts experienced by fishing fleets.

Procedure for a Disruption Agreement

3.4.8 All claims must satisfy the following points:

- claims will be paid only for losses caused due to the construction of the Proposed Development;
- there must be a close link between the construction of the Proposed Development and the claimant's losses (e.g. due to exclusion from fishing grounds and/or disruption to normal activities);
- all claims should be reasonable and justified based on demonstrable economic loss;
- evidence must be provided to support the claim; and
- payment will be paid only if business is being carried out in accordance with the relevant legislation (i.e. the vessel is licensed to operate as a commercial fishing vessel and adheres to fisheries legislation).

Evidence Base

3.4.9 The following documentation and data are expected to be required to form an evidence base to support any claim for disruption payment:

- 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 plotter records to provide clear historic evidence of potential disruption 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).

3.4.10 The purpose of the evidence base is to document active fishing across the area of works and demonstrate the level of economic loss that is expected over the period of works.

3.5 Good Practice Measures

Overview

3.5.1 The Developer is committed to employing industry standard good practice measures during all phases of the Proposed Development. Those measures relevant to fisheries coexistence are described below.

Code of Good Practice for Contracted Vessels

3.5.2 When the Developer appoints contractors they will be contractually required to follow a code of good practice to ensure any external communication to other marine users including fishers is accurate and to aid coexistence with the fishing industry. This will include the following considerations:

- ensure all vessels under contract for the Proposed Development adhere to Convention on the International Regulations for Preventing Collisions at Sea ((COLREGs); International Maritime Organization (IMO), 1972) and The International Convention for the Safety of Life at Sea ((SOLAS); IMO, 1974) requirements;
- ensure all vessels working under contract for the Proposed Development do not engage in any commercial or recreational fishing activities;

- all vessels under contract for the Proposed Development will maintain collaborative, proactive and professional communications with fishing vessels during offshore operations;
- all vessels under contract for the Proposed Development will monitor at all times the required Very High Frequency (VHF) channels so as to receive communications directly from fishing vessels;
- all vessels under contract for the Proposed Development will adhere to sensible transit speeds, exercise caution and maintain observation during night working; and
- all vessels contracted to undertake specific work for the Proposed Development will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gears.

Navigational Safety Measures

Cable Burial

3.5.3 Cable burial is the preferred means of cable protection. The target cable burial depth for the Proposed Development will be 1.5 m, subject to the findings of the CBRA. Details of planned cable burial will be confirmed in the CaP to be prepared and approved ahead of the construction of the Proposed Development. The CaP will be informed by the CBRA and will provide detail on the final routing on the seabed of all cables, confirming target cable burial and protection measures where target burial cannot be achieved. The CaP will also set out an approach to surveys of cables and any protection during the operational life of the Proposed Development, and measures to be taken in the event of cable exposure. SFF's preference for rock placement as a means of cable protection (rather than, for example, concrete mattresses) is noted by the Developer and will be taken into account where possible in preparing the CaP.

Safety Zones

3.5.4 The Developer will apply for Safety Zones. Temporary Safety Zones of up to 500 m will be sought during construction, major maintenance, and decommissioning phases. Where appropriate, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, O&M, and decommissioning phases.

3.5.5 During the construction (and decommissioning) phase, the Array Area 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 Safety Zones, noting the Cardinal Marks (buoys) do advise Mariners to avoid the area.

3.5.6 Safety Zones and buoyed areas will be communicated to other marine users via Notice to Mariners (NtMs).

Vessel Transit Routing and Shelter Areas

3.5.7 Project related vessel activity will be managed by the Marine Coordinator via a Permit to Work system, which in essence is a health and safety management tool that requires obtaining permission, assessing risks and implementing

necessary precautions before entering a works area and carrying out specific activities offshore. Once the location of the Proposed Development working port(s) is confirmed, indicative vessel transit routes to and from the works area will be identified (in the NSVMP which will be subject to consultation with SFF prior to its approval) and vessels will adhere to these routes wherever possible. Vessel anchorage areas, and areas to be avoided, will also be identified and contractors will be instructed to comply.

3.5.8 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 other sea users.

3.5.9 It is also recognised that static fishing gear may be located anywhere in the east coast and there is no expectation that indicative transit routes or shelter areas will be cleared of static fishing gear. As such, contracted vessels associated with the Proposed Development are always required to maintain a lookout for, and avoid, appropriately marked fishing gear.

Marking and Charting

3.5.10 During the construction phase, the Proposed Development construction area will be clearly marked using buoys. All construction vessels and installed Offshore Infrastructure will be appropriately lit and marked. All installed Offshore Infrastructure will be marked on United Kingdom Hydrographic Office (UKHO) Admiralty Charts.

Dropped Objects

3.5.11 The requirement to set out procedures relating to dropped objects is set out in the relevant conditions of the Section 36 consent and associated Marine Licences, particularly the requirement to prepare, for approval, an EMP. The EMP confirms that any objects dropped on the seabed during works associated with the Proposed Development will be reported, and objects will be recovered where they pose a hazard to fishing or safe navigation, and where recovery is practicable. Further details on the dropped objects reporting procedure are provided in the EMP. All Contractors will be required to comply with the approved EMP.

3.5.12 Should the dropped object pose a navigational risk, a NtM and Kingfisher Notice will be issued once the location, and details of the object can be established.

Cable Protection Surveys

3.5.13 The Developer commits to surveys across areas of cable protection deployed across static portions of IACs and Offshore Export Cables to establish that fishing can resume safely post construction. The nature and extent of these surveys, which may include over-trawl surveys or studies, will be determined within the CaP following confirmation of final cable installation plans and consultation with commercial fishing industry.

Procedures Specific to Fisheries Interactions

Procedure in Relation to Gear Fastening or Loss

3.5.14 The Kingfisher Information Service - Offshore Renewable & Cable Awareness project (KIS-ORCA) is a joint initiative between Subsea Cables UK and RenewableUK and is being managed by the Kingfisher Information Service of Seafish. Details of the Proposed Development's physical infrastructure will be provided within KIS-ORCA data, which should be downloaded onto a vessel's fishing plotter. To reduce the risks of fishing near offshore structures, it is essential to be up to date with KIS-ORCA information.

3.5.15 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".

3.5.16 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 Proposed Development:

- if the fastened gear is not easily retrieved, fishermen should not apply excessive winch, line or net hauler loads or engine powers in attempts to retrieve fastened gear;
- fishing vessel should advise the HM 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 or the FLO;
- 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 Proposed Development.

3.5.17 The following procedure, based on the same sources of guidance as referenced above, should be followed in the event of fishing gear becoming lost or damaged within the boundaries of the Proposed Development:

- on discovery of the lost or damaged gear at sea, the fisherman 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 fisherman must report the incident to the FLO within five days and if possible, provide photos of the damaged gear;
- once the FLO has been informed of the incident, the FLO will provide a gear loss or damage claim form to the fisherman. The fisherman 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 FLO as soon as possible after the incident. 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 for the cost of repair or replacement of the gear, whether undertaken by a third-party or by the vessel's crew; and
- following the receipt of this fishing gear loss or damage claim form, the Developer will review the information provided and carry out appropriate further investigations. Where appropriate, this may include engagement with the claimant and relevant parties to establish the circumstances of the incident through a transparent and proportionate fact-finding process. The Developer will respond to the claim via their FLO as soon as possible.

3.5.18 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, FLO 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, as determined through the review and investigation process described above.

Procedure for Gear Relocated/Removed by Gear Owner

3.5.19 During the construction and O&M phases, Safety Zones around construction and O&M works will be determined and communicated to the commercial fishing industry. The owner of gear within the offshore Safety Zones and works areas will be requested by the Developer and/or its related parties or its contractors to relocate or remove gear from within the Safety Zone provided that:

- Safety Zones 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 reasonable and evidenced costs associated with relocation or removal of gear, in accordance with an evidence-based approach.

4 Monitoring

4.1 Rationale for and Approach to Monitoring

4.1.1 Consideration has been given by the Developer to the potential role that commercial fisheries monitoring may have in contributing to an improved understanding of how fishing activity may respond to the presence of the Proposed Development in combination with other OWF developments in the region. This reflects the scale and complexity of potential cumulative effects on commercial fisheries receptors, alongside recognised limitations in the publicly available evidence base relating to long-term changes in fishing activity in areas subject to multiple OWF developments.

4.1.2 The assessment of the Proposed Development alone identifies no significant effects on commercial fisheries in EIA terms. As such, the Proposed Development in isolation does not give rise to a specific requirement for monitoring. Consideration of monitoring in this context is instead related to the potential value of strategic, regionally coordinated approaches that may support the validation of cumulative effects assessments and contribute to the wider evidence base. Any contribution by the Developer would be proportionate to the limited contribution of the Proposed Development to cumulative effects and would focus on participation in any regionally coordinated monitoring initiatives that may be developed.

4.1.3 It is recognised that, where commercial fisheries monitoring is undertaken in the context of cumulative OWF development, it may be more effectively addressed through a holistic and inclusive regional approach, rather than through isolated project-specific monitoring programmes. Any monitoring arrangements, should they be progressed, would therefore be expected to be developed collaboratively, where appropriate, with other offshore wind developers and relevant stakeholders.

4.1.4 In this context, the Developer would seek to engage with the East Region Commercial Fisheries Working Group and other relevant parties to discuss opportunities to contribute to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring. Such an approach may seek to make appropriate use of existing data sources and industry knowledge to improve understanding of spatial and temporal patterns in commercial fishing activity over time, in a manner that is consistent across developments and proportionate to the scale of effect. The Developer will participate in these regional discussions where they occur and will consider proportionate contributions to any agreed collaborative monitoring framework.

4.1.5 Any participation in a strategic monitoring initiative would be proportionate and non-substitutive, such that the withdrawal or non-delivery of individual projects from a group initiative would not result in additional monitoring obligations being placed on remaining developments.

4.1.6 Monitoring outputs, where available and relevant, could be considered for use in informing future iterations of the FMMCP, subject to consultation and agreement. The scope, methodology, duration and governance of any monitoring

would be determined through the collaborative process and would reflect relevant guidance, the evolving evidence base, and the cumulative development context.

4.1.7 The approach outlined above is consistent with Scottish Government guidance on commercial fisheries monitoring and reflects consideration of evidence gaps identified through Scottish Marine Energy Research in relation to commercial fishing activity in the vicinity of offshore wind farms and associated infrastructure.

4.1.8 Intended Developer monitoring commitments are presented in Table 4.1

Table 4.1: Commercial Fisheries Monitoring Commitments

Potential environmental effect	Monitoring commitment	Means of implementation
Cumulative reduction in access to, or exclusion from established fishing grounds	Contribution to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring to support understanding of cumulative effects.	Engagement with the East Region Commercial Fisheries Working Group and relevant stakeholders to inform the scope, data sources, and governance of monitoring; implementation through the FMMCP, where appropriate and proportionate.
Cumulative displacement leading to gear conflict and increased fishing pressure on adjacent grounds		

5 Communication

5.1 Principles of Liaison

5.1.1 The Developer regards coexistence as the presence of both industry's within and around the Proposed Development. Use of the term coexistence does not imply full compatibility, acceptability, or the absence of interaction between the two sectors. An approach of avoiding and reducing impacts to the fishing industry is regarded as the most sustainable approach to coexistence and the Developer considers effective communication and information transfer to be a key mechanism for coexistence.

5.1.2 This section sets out the roles and responsibilities that the Developer and key contractors will adopt to support its commitment to coexistence, including the appointment of a CFLO, OFLOs, and Fishing Industry Representatives (FIRs) as necessary.

5.2 Roles and Responsibilities

5.2.1 Details of the roles and responsibility of the Developer 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 Figure 5.1.

5.2.2 The roles described within this section relate to fisheries liaison and marine coordination functions only and do not supersede statutory responsibilities of vessel masters or applicable maritime legislation.

Table 5.1: Roles and Responsibility of the Developer and its Future Contractors

Role	Responsibility
The Developer	The Developer has overall responsibility for the FMMCP.
Project Director	Approval of the FMMCP for submission to MD-LOT. Responsible for requiring sufficient resources and processes are in place to deliver the FMMCP.
Development Team	Liaising with CFLO, OFLO and FIRs; and Facilitating any updates to the FMMCP.
Contractors and Sub-contractors	Work with the Developer to implement the FMMCP, where applicable.
CFLO	Provide the Developer with support and guidance regarding communication and coexistence with the fishing industry.
FIR	Work with the CFLO and the Developer to provide support and guidance regarding the fishing industry.
OFLO	Communication point between the Developer's contractors and the fishing industry on site during offshore works.

The Developer

5.2.3 The responsibilities of the Developer in relation to this FMMCP are:

- progress the construction of the Proposed Development with the least disturbance practicable to the local fishing activities;
- maintain the ongoing employment of a CFLO and OFLO (as required when there is offshore works that could interact with existing fishing activities) throughout the lifetime of the Proposed Development;
- aid in the prevention of conflict through the timely provision of information to the CFLO, FIR and the fishing industry, including in relation to boulder relocation, cable laying, 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 to reduce and appropriately manage potential interactions with fishing vessels; and
- establish suitable and evidence-based cooperation agreement methodologies in line with FLOWW guidelines (and forthcoming updates to that guidance).

Company Fisheries Liaison Officer (CFLO)

5.2.4 A CFLO will be appointed by the Developer for all phases of the Proposed Development, where required. The CFLO reports to the Developer's Development Team. The CFLO will liaise regularly with the OFLOs and FIRs, as required.

5.2.5 In accordance with Section 3.1.1 of the FLOWW (2025) guidance, the CFLO's duties will include:

- preparing and maintaining a Proposed Development-specific register of local fisher's groups and associations;
- engaging in consultation with the fishing community to understand any concerns with the Proposed Development and associated survey and construction activities;
- arranging or attending as necessary fisheries meetings (with local fisher's, fisheries associations) to:
  - promulgate information on the design envelope, construction programme, and provide updates on any changes to the Proposed Development throughout the pre-construction phase;
  - gather fisher's views on effects of projects on their working practices; and
  - work with fisher's to resolve any issues or conflicts arising where practicable.
- provide advice to the Developer on fisheries liaison throughout the construction and operation of the Proposed Development;

- develop and maintain a strong beneficial 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 Proposed Development;
- 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.

5.2.6 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 Proposed Development;
- 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 Proposed Development 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, any relevant sensitivities and contact details for communicating with the fishing vessels at sea;
- 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 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);
- communicate details of exposed cables and any other safety hazards to the fishing industry;
- coordinate the activities and responsibilities of the FIRs (if required); and
- provide monthly reporting to the Developer's Environmental Manager during the construction phase of the Proposed Development.

5.2.7 In addition, the CFLO will assist the Developer should there be a need for financial arrangements, such as Disruption Agreement payments for fishers if requests for the temporary movement of static gear are made. This process will

need to be carried out according to recognised standards throughout the UK territorial waters. The CFLO should always act professionally and not make any disclosures or commitments regarding financial arrangements without the Developer's approval.

5.2.8 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. Contact in any such non-emergency incident should initially be made with the OFLO at the time, who together with the vessel master can provide a response 24 hours per day. Details of how to contact the OFLO are included in all NtMs from the Developer.

5.2.9 If the incident is an emergency at sea, the fishing vessel should contact the coastguard through the normal channels.

Offshore Fisheries Liaison Officer (OFLO)

5.2.10 When required, the Developer will utilise suitably qualified OFLOs throughout the construction and O&M phases of the Proposed Development. This will ensure that key vessels associated with the Proposed Development include suitably skilled and experienced OFLOs who have relevant local knowledge of the fisheries which could be affected.

5.2.11 The primary responsibility of the OFLO is to act as an effective communication point between the Developer's contractors and the fishing industry on site during offshore works. The OFLO will be the first point of contact for fishermen at sea whilst activities are taking place. The OFLO will be in communication with the Developer's commercial fisheries manager and the CFLO in order to communicate with the local fishing industry about the ongoing activities.

5.2.12 OFLOs will be deployed on the survey or construction vessels undertaking the relevant offshore works, where liaison is most effective. Deployment of an OFLO on a guard vessel will only occur where placement on the working vessel is genuinely unavoidable. This approach ensures that real-time communication between the working vessel and fishing vessels is maintained and that the effectiveness of the liaison function is not diminished.

5.2.13 The primary responsibilities of the OFLOs are to:

- maintain regular contact with the CFLO and the Developer's personnel, contractors and sub-contractors, as required, concerning vessel traffic and fishing vessel activity in the vicinity of the Proposed Development;
- maintain watch for vessel 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 Proposed Development-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 Proposed Development 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 Proposed Development;
- 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 Proposed Development (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 Developer's personnel and the CFLO.

Fishing Industry Representatives (FIR)

5.2.14 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. A FIR will support activities that would otherwise be undertaken by the CFLO. FIRs may be employed to engage with fisheries within a particular geographical area or have specialist knowledge of certain types of fishing activity.

5.2.15 If FIR(s) are utilised, and the CFLO is not undertaking the responsibility, they will make skippers of fishing vessels aware of any forthcoming operations and other ongoing activities related to the Proposed Development. The roles and responsibilities of FIR and CFLO can be very similar and often delivered by one individual, dependant on knowledge and resource requirements.

5.2.16 The primary responsibilities of the FIR(s), if employed, are to:

- 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 Developer 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 Proposed Development;
- 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;

- assist the CFLO at a local level in undertaking the tasks listed above, including:
  - assist the Developer'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.

5.2.17 The FIR(s) will be contracted by the Developer 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 has a line of communication to the Developer and vice versa.

Guard Vessels

5.2.18 During construction and O&M, the Proposed Development 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.

5.2.19 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 Proposed Development. The OFLO will normally be deployed on the survey or construction vessels undertaking offshore works. Deployment of an OFLO on a guard vessel will only occur where placement on the working vessel is not reasonably practicable.

Construction Vessels

5.2.20 During pre-construction, construction, O&M and decommissioning activities, vessels engaged in works at the Proposed Development will operate in accordance with applicable maritime legislation and the relevant provisions of this FMMCP. The master of each vessel will retain overall responsibility for safe navigation and vessel operations. Construction vessels will, as appropriate and where reasonably practicable, maintain awareness of fishing activity in the vicinity of the works, communicate with fishing vessels where necessary, facilitate the deployment of an OFLO in accordance with this FMMCP, and cooperate with the OFLO, CFLO and Marine Coordinator in relation to fisheries liaison, incident reporting and the management of potential interactions with fishing vessels and static fishing gear.

Marine Coordination

5.2.21 In addition to CFLO, FIR(s) and OFLO, a Marine Coordinator for the Proposed Development 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 Proposed Development; including monitoring and managing all construction vessel activity. For dissemination of Proposed Development activity information to other vessels offshore in the vicinity of the Proposed Development, including fishing vessels, the Marine Coordinator shall act as the principle point of reference for the CFLO/FIR(s)/OFLOs, and shall be a point of contact for vessels navigating close to the Proposed Development.

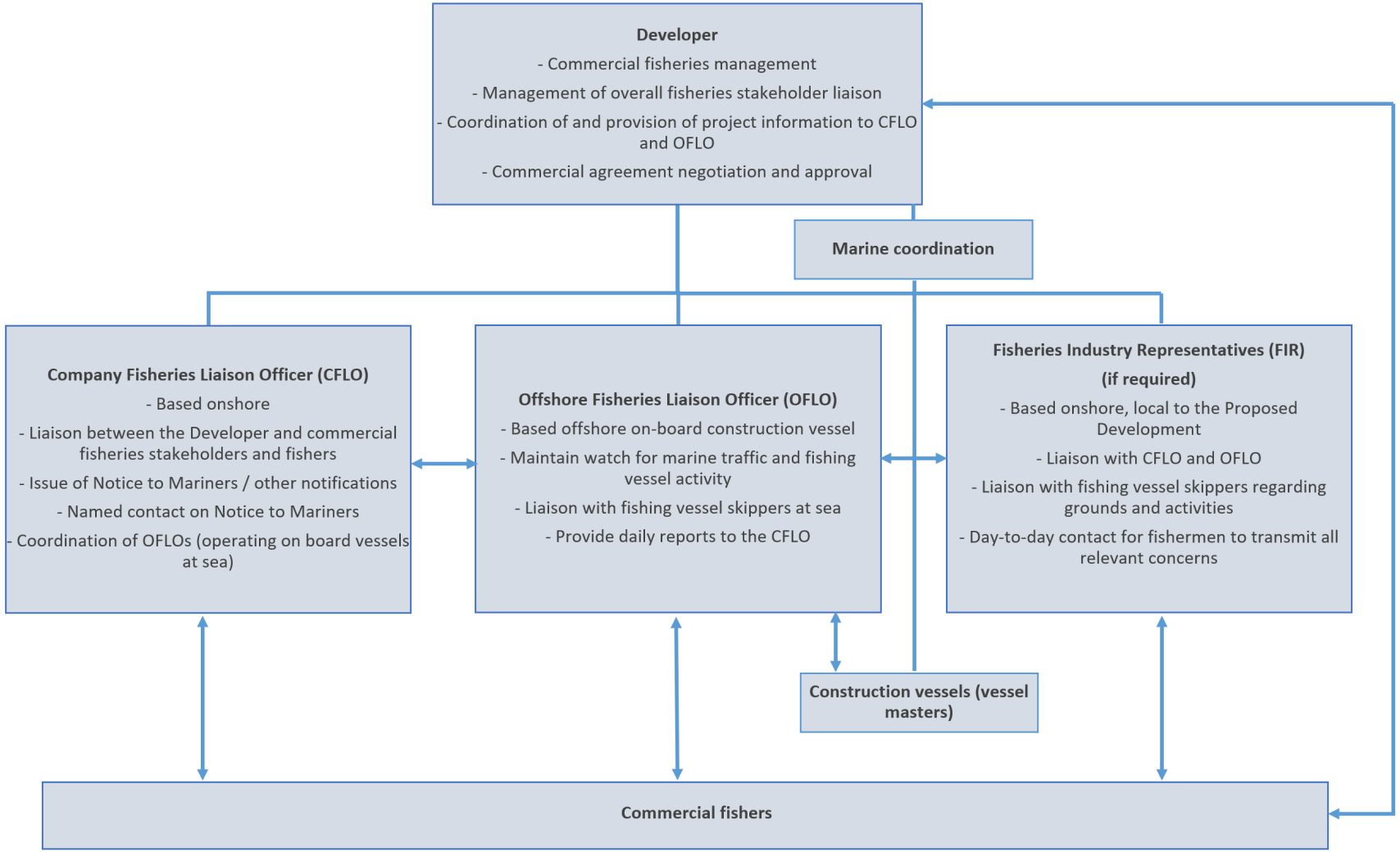

Figure 5.1: Team Organogram and Consultation Links to Fisheries Stakeholders

5.3 Ongoing Engagement

5.3.1 Throughout all phases of the Proposed Development, the Developer will remain committed to maintaining open dialogue and effective communications with the fishing industry. This is key to supporting the Developer's commitment to coexistence where possible to enable both the Proposed Development and the relevant commercial fisheries to manage works through awareness of upcoming activities, for example notification of planned construction works.

5.3.2 Example liaison scenarios are presented in Figure 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 Developer should contact the relevant FIR and/or CFLO; where they are offshore and working in the vicinity of the Proposed Development with a more immediate issue or concern, they should contact the CFLO and/or the OFLO.

5.3.3 Contact details of the CFLO will be included within NtMs that will be issued 14 days prior to the commencement of works, where feasible.

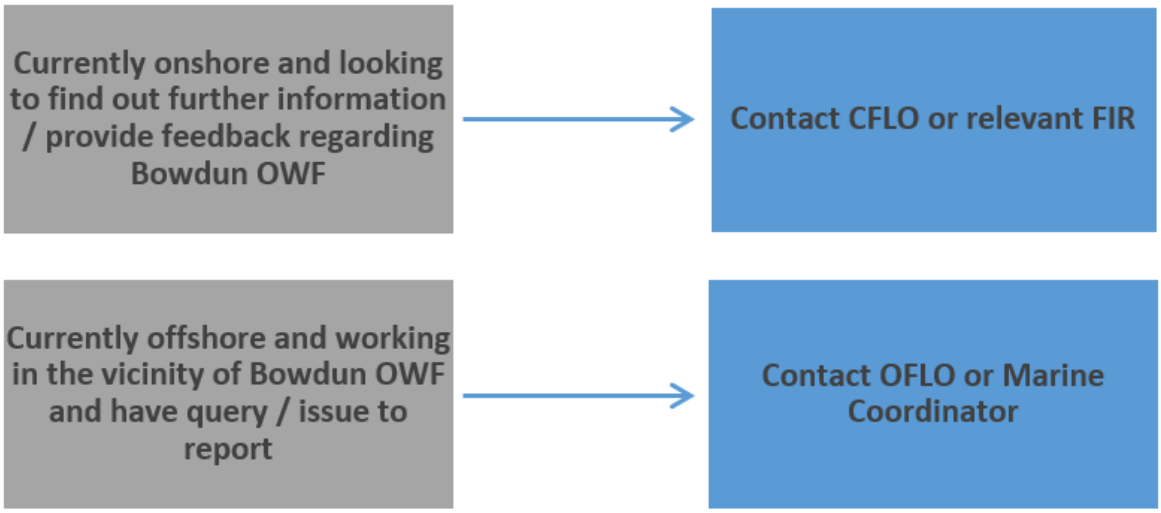

Figure 5.2: Fisheries Contacts in Specific Scenarios

5.3.4 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.

5.3.5 The Developer is supportive of the SFF-led Horizon Watch initiative, an information bulletin intended to assist Scottish fishermen by providing advance awareness of proposed subsea cable routes and other installations. The Developer will continue to monitor the development of Horizon Watch and engage with the initiative where it is considered appropriate.

Table 5.2: Proposed Development Information Communication Summary

Communication	Information Promulgated
NtM **Kingfisher Bulletin**[2]	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 Developer'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.
Surveys which may require gear relocation or may cause significant disruption to fishing activity	Notices and information distributed 14 days prior to survey mobilisation (where feasible).
Dropped Objects[3]	In the event of a dropped object offshore, the Developer will notify MD-LOT as soon as practicable after becoming aware of the event. Should the dropped object pose a hazard to fishing or navigational safety, a NtM will be issued once the location, and details of the object can be established. Furthermore, the Developer 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. Any further steps as required in consultation with MD-LOT will be notified through an NtM where applicable.
Regional CFWG meetings	Regular meetings, with frequency to be determined in a future CFWG Terms of Reference, at which the Applicant can updates on the Proposed Development and engage with stakeholders on strategic, regional issues, including cumulative effects and the development of proportionate, regionally coordinated approaches to commercial fisheries monitoring.
Marine Coordination	The Marine Coordinator will provide a direct point of communication for fishing vessels when active in areas relevant to the Proposed Development. Fishermen can contact the Marine Coordinator via marine radio channels or the Marine Coordinator phone line.
Unscheduled and ad hoc liaison	Additional unscheduled liaison and consultation will be undertaken by either the CFLO or the FIR(s) as required to address issues and fishermen's concerns as they arise.

[2] https://kis-orca.org/

[3] https://www.gov.scot/publications/offshore-renewables-accidental-deposit-of-an-object-at-sea-form-and-guidance/

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A1 Annex A – Summary of stakeholder engagement carried out in relation to the FMMCP

A1.1.1 In addition to ongoing stakeholder engagement on the Proposed Development, the table below provides a summary of the stakeholder engagement carried out specifically in relation to this FMMCP at the date of document issue. Further engagement on the FMMCP is anticipated.

Date, consultation type and stakeholder	Stakeholder comment	Summary of How Stakeholder Views Informed FMMCP	Developer Response Where Stakeholder Views Did Not Affect a Change (Where Applicable)	Reasons for Divergence of Views Between Parties
15/01/2026 **Draft FMMCP issued to:** • N&EC RIFG • SFF • SPFA • SWFPA **30/01/2026** **Written feedback on draft FMMCP received from SFF**	1. FLOWW guidance reliance - FMMCP relies heavily on FLOWW guidance despite SFF withdrawal; recommend removing references and noting forthcoming Scottish-specific guidance. 2. Representation of fishing activity - Fishing activity within the Array Area and ECC is understated; statements such as “no/very low activity” do not reflect seasonal and dynamic fleet behaviour. 3. “No significant effects” conclusions - Repeated reliance on EIA “non-significant” conclusions may understate practical impacts such as displacement, congestion and increased operating costs. 4. Disruption Agreements scope - Disruption Agreements limited to the ECC; recommend broader applicability across the project area and removal of reliance on FLOWW guidance. 5. Compensation scope - Compensation provisions appear focused on static gear and do not clearly accommodate mobile gear interactions or displacement-related economic loss. 6. Monitoring proposals - Monitoring framework is regional with no project-specific commitments; recommend clearer triggers and responsibilities for project-level monitoring. 7. Cumulative effects - Cumulative impacts referenced only broadly; stronger acknowledgement of east coast cumulative displacement pressures requested. 8. Cable burial depth - No target burial depth specified; SFF recommend a design aspiration of 1 m minimum burial. 9. Navigational vs fishing hazards – Risk references focus on navigation; procedures should explicitly recognise hazards to fishing gear (e.g. snagging/dropped objects). 10. OFLO deployment location - FMMCP allows OFLO placement on guard vessels; recommend primary deployment on construction/survey vessels consistent with OGUK guidance.	1. Minor FMMCP edits made to reduce reliance on cross-reference to previously established fisheries liaison guidance. Existing references to FLOWW retained; FMMCP wording clarifies that procedures are set out directly within the document and will be reviewed should Scottish-specific guidance emerge. 2. Very minor amendment to the FMMCP made to incorporate a slightly expanded commercial fisheries baseline description. It is noted that, at the time of engagement with fishing industry representatives, the Offshore EIA Report had not yet been published. The FMMCP is now presented in the context of the published Offshore EIA Report, which provides the full evidence base for the fisheries baseline and assessment. 6. Minor amendment to the FMMCP to confirm the Developer’s intended participation in regional CFWG discussions relating to strategic, regionally coordinated commercial fisheries monitoring initiatives. 7. Minor addition to the FMMCP to acknowledge cumulative effects are considered within the Offshore EIA Report and have been considered in development of the FMMCP. 8. Amendment to the FMMCP to confirm that the assessed design envelope assumes a target cable burial depth of 1.5 m (subject to CBRA). Final target burial depth will be confirmed post-consent through the Cable Plan. 9. Minor amendment to the FMMCP to ensure consistent reference to risks to fishing activity and fishing gear, alongside navigational safety, within dropped objects procedures. 10. Amendment to the FMMCP to clarify that deployment of the OFLO on the survey or construction vessel undertaking the works is the preferred approach wherever practicable. 11. Amendment to Figure 5.1 to reference “construction vessel and/or guard vessel” to clarify communication hierarchy.	1. Some acknowledgement of FLOWW has been retained in parts of the FMMCP. 3. No amendment to the FMMCP. The terminology reflects the outcome of the statutory EIA process. The Offshore EIA Report distinguishes between project-alone effects and cumulative effects identified for certain fleets. 4. No amendment to the FMMCP. Disruption Agreements remain focused on temporary loss of access due to offshore works associated with the Proposed Development. Consistent with the conclusions of the EIA, Disruption Agreements are expected to primarily be applicable in the Export Cable Corridor. Agreements will be evidence-based and implemented where demonstrable disruption to fishing activity occurs. 5. No amendment to the FMMCP. The document sets out the circumstances in which Disruption Agreements may be considered in relation to evidenced temporary disruption arising from construction activities. The approach reflects established offshore wind industry practice and the conclusions of the EIA regarding the nature and duration of potential disruption. To be clear, Disruption Agreements do accommodate mobile gear where relevant. 6. No monitoring commitments are made on the basis of project-alone effects, which are not significant in EAI terms.	1. Some acknowledgement of FLOWW has been retained in recognition that FLOWW remains the only established fisheries liaison guidance referenced within current Scottish Government guidance and the National Marine Plan. 3. Stakeholder concern about potential operational implications for fishing activity is noted. The FMMCP reflects the regulatory terminology and outcomes of the formal EIA assessment process. 4. Stakeholder preference for broader disruption arrangements across the project area. The Developer position reflects the relative concentration of fishing activity within the Export Cable Corridor compared with the Array Area. Disruption Agreements are therefore focused on Export Cable Corridor construction activities where temporary disruption to fishing activity may arise. 5. Stakeholder view that displacement effects may warrant broader compensation mechanisms. The Developer approach reflects established industry practice whereby disruption arrangements address evidenced temporary construction-phase disruption. 6. Monitoring detail divergence reflects differing expectations between stakeholders seeking project-specific commitments and the Developer’s preference for proportionate, regionally coordinated monitoring frameworks.

Date, consultation type and stakeholder	Stakeholder comment	Summary of How Stakeholder Views Informed FMMCP	Developer Response Where Stakeholder Views Did Not Affect a Change (Where Applicable)	Reasons for Divergence of Views Between Parties
	11. Organogram wording - Figure 5.1 should reference “construction vessel and/or guard vessel” to clarify communication hierarchy. 12. Early cable route notification - Recommend commitment to early notification of ECC routing (e.g. via Horizon Watch) prior to publication on KIS-ORCA. 13. Gear-loss reporting - Current wording may place disproportionate evidentiary burden on fishermen; recommend a more balanced process including joint fact-finding.	12. Text addition to FMMCP noting that additional early-notification mechanisms (such as Horizon Watch) may be considered where appropriate as part of the communication strategy. 13. Minor amendment to the FMMCP wording to clarify that the Developer’s review of gear loss incidents may involve proportionate engagement with claimants to establish the circumstances of the incident.		
05/03/2026 **Second round of written feedback on draft FMMCP received from SFF, following Developer response to the first round of SFF feedback**	SFF confirmed no further comments on Points 8–13 (as per numbering in above table row). For Points 2–3, SFF noted that full consideration will occur once the Commercial Fisheries EIA Report chapter is available at application stage. Additional comments were provided on Points 1 and 4–7 relating to: 1. Continued concern regarding reliance on FLOWW guidance; 4. Scope of Disruption Agreements; 5. Clarity regarding compensation for mobile gear; 6. Absence of project-specific monitoring commitments; and 7. The need for stronger commitments relating to cumulative effects.	SFF follow-up comments were reviewed and considered in finalising the FMMCP. Minor clarifications previously incorporated in relation to the fisheries baseline description, monitoring participation in regional initiatives, cumulative effects acknowledgement, hazard terminology, liaison arrangements and gear-loss procedures remain unchanged. No additional amendments were made in response to the follow-up comments.	1. The Developer notes SFF’s continued position regarding FLOWW guidance. In the absence of formally adopted Scottish-specific alternative guidance, the FMMCP retains some reference to established fisheries liaison good practice reflected in current Marine Directorate guidance but has sought to minimise repeated reference to FLOWW. 4. The scope of Disruption Agreements remains focused on Export Cable Corridor construction activities, reflecting the relative concentration of fishing activity within the ECC and the EIA conclusions regarding where temporary access restrictions are most likely to occur. 5. The FMMCP does not preclude consideration of claims from mobile gear fleets where demonstrable economic loss can be evidenced. 6. Monitoring proposals remain focused on participation in strategic, regionally coordinated monitoring initiatives given that significant effects identified in the assessment relate to cumulative rather than project-alone impacts. 7. Cumulative effects are addressed within the Offshore EIA Report. The FMMCP focuses on mitigation, liaison and monitoring measures that can reasonably be implemented at the project level.	Differences in position remain regarding the continued reference to FLOWW guidance, the spatial scope of Disruption Agreements, the extent to which displacement effects should be addressed through compensation mechanisms, the role of project-specific monitoring where effects are assessed as non-significant in EIA terms, and the extent to which project-level mitigation can address wider regional cumulative pressures.