

Consultation Responses – April 2025

Maritime and Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [Vaughan Jackson](#); [Nick Salter](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Cable Plan (CaP) - Consultation - Response Required by 30 April 2025
Date: 15 April 2025 16:13:30
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon, Toni-Marie.

Thank you for the opportunity to comment on the Cable Plan (CaP) for Culzean Floating Wind. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents, and would like to comment as follows:

The CaP has been produced to satisfy the requirements of condition 3.2.11 of the marine licence (marine licence number MS-00010921) and includes the following key components:

- One WTG;
- One floating substructure;
- Up to six mooring lines
- Up to six drag anchors;
- One 2.5 km long IAC cable; and
- Associated scour and cable protection (if required).

The intention is that the WTG will have a design life of 10 years and installation of the cables is planned to start from July 2025 through until September 2025 as presented in table 4-1. We have no objection to this period being modified as long as notification is given to relevant stakeholders, MD-LOT, NLB and MCA.

MCA are content with the cable installation sequence as per 5.4.2 and welcome the commitment from the applicant to seek variations to the licence in the event of alternative cable protections, that are not already covered, being required as outlined in section 6.

provided all maritime safety legislation is followed, and the original conditions of consent and advisories are adhered to, the MCA confirms that we are content with the proposed CaP and have no further comment.

If you have any questions on this response, please let us know.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation

[Redacted]

[Redacted]



Maritime &
Coastguard
Agency



Maritime & Coastguard Agency

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www.gov.uk/mca

NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [MARINEENERGY](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Cable Plan (CaP) - Consultation - Response Required by 30 April 2025
Date: 17 April 2025 14:20:38
Attachments: [image001.png](#)

Dear Toni-Marie,

Thank you for the consultation on the Cable Plan (CaP) for the Culzean Floating Offshore Wind Turbine Pilot Project (document reference: GB-CZT-00-TOTA-000010), submitted in order to satisfy condition 3.2.11 of the marine licence.

We note the information provided regarding the 11kV Inter Array Cable (IAC), which is approximately 2.5km in length and will connect the floating turbine to existing Culzean oil and gas facilities. It is stated that the final route and trenching engineering for the IAC is currently ongoing, however an indicative location is provided in Figure 2-1. Furthermore, a summary of completed and anticipated site investigation surveys is included in Table 3-1 and construction work timings are set out in Table 4-1. Cable inspections post-installation are discussed in section 7.1 and reporting measures (including an as-built report by way of Notice to Mariners and overtrawl survey reporting) are set out in Table 8.1.

Following review of the CaP, we provide the following points for further consideration:

<!--[if !supportLists]-->• <!--[endif]-->Section 4.1 includes technical specifications of the IAC and states that the cable will be buried to a depth between 0.5m – 1m. We note that within the Environmental Assessment (Chapter 4 - Project Description) minimum target depth was stated as 0.6m. Rationale for this change in minimum target depth from that in the EA has not been clearly provided. Section 6 goes on to detail protection where trenching cannot be achieved.

<!--[if !supportLists]-->• <!--[endif]-->Regarding Electromagnetic Fields (EMF), whilst section 4.1 includes some technical detail of the IAC, information is not provided on expected EMF levels, noting the following statement “*as the cable is being buried to a depth of between 0.5 – 1 m deep, the Electromagnetic Field impact is minimal and therefore would not affect marine life*”. We highlight that throughout the EA (i.e. Chapter 8 - Benthic Ecology, Chapter 9 Fish & Shellfish Ecology and Chapter 10 Marine Mammals & Other Megafauna) it is reiterated that EMF recorders will be implemented as part of the Culzean Scientific Research and Development (R&D) Programme. We note that reference to EMF recorders or the wider Scientific R&D Programme commitment is not included within the CaP. In addition, we understand that ScotMER are preparing a project to improve collective understanding of potential electromagnetic field (EMF) impact pathways and help validate underlying assumptions, and so we wish to highlight that there may be potential synergies with this project in relation to the Culzean IAC and also the Culzean Scientific R&D Programme.

<!--[if !supportLists]-->• <!--[endif]-->We note that section 5.3 on Unexploded Ordnance (UXO) has been marked 'N/A'. It is not clear to us why information regarding UXO has been considered not applicable to the CaP. Although it is our understanding the UXO is not expected in the proposed IAC route. We note the following paragraph has been included within the Construction Method Statement (CMS; doc ref - GB-CZT-00-TOTA-000005): *"No Unexploded Ordnance (UXO) were detected during site-specific surveys with a magnetometer or during any other surveys undertaken within the Culzean Field over the last 15 years. The 2023 surveys also confirmed that that boulder movement will not be required prior to anchor installation. Pre-installation surveys took place in 2024 and will continue in 2025. These will consist of visual inspections (using Remotely Operated Vehicle (ROVs)) of the mooring locations and cable routes to confirm the exact routing and determine the need for any seabed preparation. These surveys are likely to take up to a day. All survey equipment will utilise ultrashort baseline positioning equipment to ensure precise subsea locations. More details on the surveys are included in the Cable Plan."* For clarity and continuity we suggest a similar explanation regarding UXO should also be included within the CaP.

<!--[if !supportLists]-->• <!--[endif]-->Section 1.5 sets out that updates and amendments will be made to the CaP as relevant and in line with other post-consent plans. We note that section 5.4.1 of the CaP outlines that IAC load-out will be undertaken at a marshalling yard in either Norway or the UK. Following our review of the CMS it is our understanding that the marshalling yard is located in Norway, it would be expected that the information contained in the CaP and CMS is aligned.

<!--[if !supportLists]-->• <!--[endif]-->In addition we note several errors in document structuring which should be amended to ease reader navigation and cross-referencing, including:

<!--[if !supportLists]-->○ <!--[endif]-->Section 1.2 lists the scope and objectives of the CaP, in reference to Marine Licence conditions the reader is directed to section 1.4. We note that section 1.4 of the CaP does not detail the Marine Licence conditions. In other post-consent plans submitted for the Culzean Floating Pilot (i.e LMP, EMP, DSLP and CMS) relevant consent conditions to be discharged by the plan have been included, which we have found useful for cross-referencing purposes. Condition 3.2.11 is not referenced within the CaP, for continuity we suggest this should be referred to and preferably set out as per similar post-consent plans.

<!--[if !supportLists]-->○ <!--[endif]-->For linkages with other Consent Plans the reader is directed to "Section 1.5 within Table 1-2" (see section 1.5). However, Table 1-2 is not included within the CaP. We note that other post-consent plans submitted for the Culzean Floating Pilot (i.e LMP, EMP, DSLP and CMS) include a table summarising linkages between various post-consent plans, it is not clear why this has not been included in the CaP. We

suggest a similar table should be included to summarise linkages between the CaP and other post-consent plans, in order to ensure these are clear to the reader.

- The label 'Table 3-1' has been used twice, initially for a table containing WTG co-ordinates in section 3, and again for a table summarising site investigation surveys in section 3.1.1.

I trust this is assistance.

Kind regards,

Clare

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

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Scottish Fishermen's Federation



Our Ref: FH-Culzean FW CablePlan/ 0025/003

Your Ref: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Cable Plan (CaP) - Consultation

E-mail: MS.MarineRenewables@gov.scot

25 April 2025

Dear Toni-Marie McGinn/MD-LOT,

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SFF Response to Culzean Floating Offshore Wind Turbine Pilot Project Cable Plan Consultation

The Scottish Fishermen's Federation (SFF) appreciate the opportunity to make this representation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The Chair of NERIFG was also consulted and agrees.

Cable burial and protection

SFF note from sub-section of this Cable Plan (CaP) on 'Remedial Protection' (p24) that the primary method of cable protection will be trenching with supplementary rock/mattresses placement on the sections of cable route where trenching is not possible.

Being concerned for fishermen's safety, the SFF would suggest to the Applicant to initially make all efforts to reach the required depth of cable burial and avoid using cable protection measures as much as possible. Since the volume of cable protection mass will disrupt the marine habitat and would create a snagging hazard for fishing vessels within the cable corridor. Although, due to lack of fishing data we have at our disposal, it is assumed that the Culzean Floating Wind (CFW) is an area which is not frequented by fishermen. However, as fishing patterns change and with the continued spatial squeeze and displacement effects of other developments at the vicinity of this project, we cannot rule out that this area will not become a more utilised area in the future. International vessels also fish in this area.

In terms of using cable protections, SFF is opposed to using concrete mattresses and rock bags in open water since they create severe snagging hazards for bottom trawl fishing vessels and static gears. SFF's preferred cable protection measure is rock protection considering industry standard rock size (1"- 5") with a 1:3 profile followed by an over trawl sweep alongside a long-term monitoring programme.

Members:

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

VAT Reg No: 605 096 748

Guard vessel

The SFF welcome the Applicant's decision for using of guard vessels from the start of cable lay to the satisfactory completion of cable protection works to warn other mariners about the installation operations in progress (5.4 Cable Installation).

Considering the effectiveness of guard vessels to inform fishermen about the presence of works and existence of snagging hazard on the seabed, we propose that a guard vessel should also be used during remedial actions and cable replacement, if any cable exposures is reported or failed cable is replaced.

Notice to Mariners (NtM)

The SFF note from sub-section '5.4 Cable Installation' that during the inter-array cable installation operations, notifications to other mariners will be provided by way of Notice to Mariners (NtM), information to Sea Users Bulletins (Kingfisher Bulletin), and communications with the local port authorities.

To reiterate, we require NtM to be issued will in advance of any activity's commencement (at least 2 weeks ahead) and the NtM reissued close to the activity.

Over-trawl survey

The SFF note from 'Table 8.1' that an overtrawl survey will take place post cable works.

We welcome the Applicant's decision on conducting overtrawl and would like to reiterate that over-trawl survey is essential to assure fishermen that the cable corridor area is safe to fish. Therefore, we propose the over-trawl plan to be agreed and implemented in consultation with fishing industry to address fishermen's safety concerns.

The SFF require a commitment from the Applicant to provide us access to survey data for the laid cable to review details about rock placement, mattresses, grout bags and more. This access would help identify any anomalies, which could then be recorded and shared on the Kingfisher Bulletin for fishermen's awareness.

Boulders & Unexploded Ordnance (UXO)

The SFF note from the CaP that boulder relocation and UXO clearance will not be required/application to the cable works. We also recall the Applicants' commitment in the EIA (Table 13-1) that should any boulder relocation have to occur following installation, the SFF will be informed of the location of the relocated boulders.

We welcome the Applicant's commitment on sharing the new location of the boulders and would remind that fishermen require geographical readings to decimal of a minute format (3 decimal places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.

In case any UXO clearance is needed, we support the use of deflagration as opposed to UXO detonation to mitigate as much as possible against any animal being caught in the kill zone of detonation. We also require the location of any live UXOs avoided by micro-siting or passive UXO relocated to be reported to fishing industry for fishermen's awareness of the hazards.

As built report

The SFF note from section '8. Reporting Measures' that CFW will provide fisheries stakeholders, MD-LOT and NatureScot with as-built reports that includes as-built locations of the areas where remedial rock placement is required in the form of maps and coordinates, as soon as these become available.

Due to the importance of the 'as-built report' to fishers, we would like to receive the final version of the 'as-built report' within the first three months of cable installation. This will inform fishers of any snagging hazards on the seabed.

Yours sincerely

Fahim Hashimi
Offshore Energy Policy Officer
Scottish Fishermen's Federation

Consultation Responses – July 2025

Maritime and Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [Vinu John](#); [Nick Salter](#); [Vaughan Jackson](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation - Response Required by 18 July 2025
Date: 07 July 2025 09:44:17
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon, Amy.

Thank you for the opportunity to comment on the revised Cable Plan (CaP) for Culzean Floating Wind. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents, and would like to comment as follows:

The CaP has been produced to satisfy the requirements of condition 3.2.11 of the marine licence (marine licence number MS-00010921). We note that this is a revised CaP (Revision 02) with the additions/modifications summarised in the change log. The plan still includes the following key components:

- One WTG;
- One floating substructure;
- Up to six mooring lines
- Up to six drag anchors;
- One 2.5 km long IAC cable; and
- Associated scour and cable protection (if required)

We remain content with the revised plan and our comments submitted in regard to the original on 15th April 2025 remain unchanged. We note an addition to the cable installation sequence in 5.4.2 and welcome this.

Provided all maritime safety legislation is followed, and the original conditions of consent and advisories are adhered to, the MCA confirms that we are content with the revised CaP at this stage.

If you have any questions on this response, please let us know.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation

[Redacted]

[Redacted]



Maritime &
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From: [Clare McCarty](#)
To: [MD Marine Renewables](#); [Amy Woodward](#)
Cc: [MARINEENERGY](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation
- Response Required by 18 July 2025
Date: 15 July 2025 13:42:37
Attachments: [image001.png](#)

Dear Amy,

Thank you for requesting our advice on the on the revised Cable Plan (CaP) for the Culzean Floating Offshore Wind Turbine Pilot Project (Document Reference: GB-CZT-00-TOTA-000010; Rev.002).

We note the revisions made in this version of the CaP (as summarised in the detailed change log on pages 3-4) and have no substantive comments to make.

I trust this is of assistance.

Kind regards,

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

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Scottish Fishermen's Federation

Our Ref: OB- Revised Cable Plan (CaP)/0025/001

Your Ref: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation - Response Required by 18 July 2025

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16th July 2025

Amy Woodward
Marine Directorate – Licensing Operations Team
Scottish Government

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SFF Response to TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation

On behalf of the Scottish Fishermen's Federation (SFF), I submit the following formal response to the statutory consultation on the proposed Revised Cable Plan (CaP), submitted by TotalEnergies E&P North Sea UK Limited for the Culzean Offshore Wind Turbine Pilot Project.

The SFF represents the 450 plus fishing vessels through its constituent associations, including the Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The Chair of the North East Coast Regional Inshore Fisheries Group (NECRIFG) was consulted and is in agreement with the content of this response.

The SFF acknowledges the efforts made by TotalEnergies E&P North Sea UK Limited to incorporate stakeholder feedback into the revised CaP. We are pleased to note that several of our key concerns have been addressed, including:

- Clarification that trenching remains the primary cable protection method, with limited use of rock/mattresses within safety zones only.
- Commitment to share the as-built report with SFF within three months of cable installation.
- Notification of any boulder relocation in the appropriate coordinate format (WGS84, decimal minutes).
- Confirmation that UXO clearance is not anticipated, and if required, deflagration will be the preferred method.

However, we would like to reiterate the following points for further consideration:

Members:

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

VAT Reg No: 605 096 748

1. **Guard Vessel Use During Remedial Works:** We strongly recommend that the use of a guard vessel be extended to cover any future remedial actions or cable replacement activities. While we understand that an ERRV from the Culzean platform may be used during initial installation, we seek assurance that equivalent measures will be in place for any future works to ensure continued safety for fishing vessels operating in the area.
2. **Over-Trawl Survey:** While we acknowledge the internal review decision, we maintain that an over-trawl survey post-installation is essential to assure fishermen of seabed safety. We request that this be reconsidered, or at minimum, that the criteria for triggering such a survey be clearly defined and communicated.
3. **Advance NtM Issuance:** We request that Notices to Mariners be issued at least two weeks in advance of any activities, with a follow-up notice closer to the start date, to ensure adequate awareness among the fishing community.
4. **Use of Concrete Mattresses and Rock Bags:** While we acknowledge that the Revised Cable Plan limits the use of concrete mattresses and rock protection to areas within the 500m safety zones where trenching is not feasible, we reiterate our general concern regarding the use of such protection measures in open waters. These structures can pose snagging hazards to demersal trawling gear. Although the area is not currently subject to high fishing activity, we encourage the Applicant and the Licensing Authority to remain mindful of potential future changes in fishing activity patterns, including those arising from cumulative pressures across the region.
5. **Cable Route Visibility and Charting**
We recommend that the proposed cable route be highlighted through the Horizon Watch bulletin as an interim measure until it becomes available via KIS-ORCA. As KIS-ORCA updates are issued only once per year, there is a risk that the cable route may remain uncharted for an extended period. Early visibility through Horizon Watch would serve a dual purpose: safeguarding the asset and mitigating snagging risks for fishing vessels operating in the area.

Conclusion

While we acknowledge the progress made in addressing several of our concerns, we urge the Applicant and the Licensing Authority to reconsider the outstanding issues, particularly around over-trawl surveys and guard vessel deployment during remedial works. These measures are essential to safeguarding the interests and safety of the fishing community. We look forward to your response and remain committed to constructive engagement.

For and on behalf of the Scottish Fishermen's Federation

[Redacted]

Oliwia Biros

Offshore Consents Assessments Manager
Scottish Fishermen's Federation

Consultation Responses – September 2025

Maritime and Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [Nick Salter](#); [Vaughan Jackson](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation - Response Required by 24 September 2025
Date: 12 September 2025 10:07:59
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon, Amy.

Thank you for the opportunity to comment on the revised Cable Plan (CaP) for Culzean Floating Wind. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the documents, and would like to comment as follows:

The CaP has been produced to satisfy the requirements of condition 3.2.11 of the marine licence (marine licence number MS-00011197). We note that this is a revised CaP (Revision 03) with the additions/modifications summarised in the change log. The plan still includes the following key components:

- One WTG;
- One floating substructure;
- Up to six mooring lines
- Up to six drag anchors;
- One 2.5 km long IAC cable; and
- Associated scour and cable protection (if required).

We remain content with the revised plan and our comments submitted in regard to the original on 15th April 2025 and Revision 2 on the 7th July 2025 remain unchanged.

Provided all maritime safety legislation is followed, and the original conditions of consent and advisories are adhered to, the MCA confirms that we are content with Revision 3 of the CaP.

If you have any questions on this response, please let us know.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation

[Redacted]

[Redacted]



Maritime &
Coastguard
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NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [MARINEENERGY](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation
- Response Required by 24 September 2025
Date: 24 September 2025 16:18:42
Attachments: [image001.png](#)

Dear Amy,

Thank you for consulting us on the revised Cable Plan (CaP) for the Culzean Floating Wind Pilot Project (document reference: GB-CZT-00-TOTA-000010, revision: 03, dated: 09/09/2025).

We note the updated timeframes for anticipated site investigation surveys in Table 3-2 and cable construction works in Table 4-1, now anticipated to begin in April 2026.

We have no substantive comments to make at this time. Should further revisions be required to the CaP we recommend that a tracked changes version may assist with review of these documents.

Best wishes,

Clare

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

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

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Scottish Fishermen's Federation

From: [Oliwia Biros](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Toni-marie McGinn](#); [Ben Walker](#); [Mohammad Fahim Hashimi](#)
Subject: Re: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Revised Cable Plan (CaP) - Consultation - Response Required by 24 September 2025
Date: 24 September 2025 13:54:08
Attachments: [image001.png](#)
[Outlook- Users_alj](#)

Hi Amy,

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

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

Regards,

Oliwia

Oliwia Biros

Offshore Consents Assessments Manager

Scottish Fishermen's Federation

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