




Cambois Connection – Marine Scheme


Volume 5 – Appendix 12.2

**Outline Fisheries Coexistence and Liaison Plan /
Fisheries Management and Mitigation Strategy**

	Outline Fisheries Coexistence and Liaison Plan / Fisheries Management and Mitigation Strategy	Appendix 12.2
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1. Introduction

1.1. Purpose and Scope

This document has been prepared by Berwick Bank Wind Farm Limited (BBWFL), a wholly owned subsidiary of SSE Renewables (SSER) Limited hereafter referred to as ‘the Applicant’, to support the Environmental Statement (ES) for the Marine Scheme of the Cambois Connection.

The Marine Scheme extends over both Scottish and English waters, therefore this document serves as both an outline Fisheries Coexistence and Liaison Plan (FCLP) and outline Fisheries Mitigation and Management Plan (FMMS), hereafter referred to as an FCLP / FMMS. Any information detailed within this is relevant to both Scottish and English waters.

This outline document sets out the Marine Scheme’s strategy to facilitate co-existence toward commercial fishing interests and approach to fisheries liaison during the construction, operation and maintenance and decommissioning phases. The aim of this outline document is to provide an overview of information that will be included in the final FLCP/FMMS such as details on fisheries liaison, engagement, safety issues and mitigation strategies.

This document provides outline details of commitments to management and mitigation measures relevant to commercial fisheries during development, construction and operation of the Marine Scheme. This document seeks to provide a consistent outline strategy toward fisheries coexistence and mitigation proposals to manage the overlap of the Marine Scheme with commercial fisheries operations and interests.

This outline FCLP / FMMS is a ‘live’ document and as such it will be further developed post-consent in consultation with regulatory bodies and stakeholders including, but not limited to, Marine Directorate Licencing Operations Team (MD-LOT), Marine Scotland Science (MSS), the Marine Management Organisation (MMO), Natural England and NatureScot, once the consent has been granted.

It includes a summary of the key measures proposed to facilitate co-existence with commercial fishing and to minimise potential impacts during the construction, operation and maintenance and decommissioning phases of the Marine Scheme, including consideration of commitments made in the Commercial Fisheries chapter of the Offshore Environmental Impact Assessment (EIA) Report (volume 2, chapter 12).

This outline FCLP / FMMS is informed by the following technical chapters:


- Commercial Fisheries (volume 2, chapter 12).

This outline FCLP / FMMS has been developed with respect to feedback provided from consultees as part of the Marine Scheme Scoping Opinions (MD-LOT, 2022; MMO, 2022), where it was highlighted that management plans should be “adequate” to be used as mitigation measures where they are key to reducing impacts.

1.2. Background

The Marine Scheme comprises up to four High Voltage Directional Current (HVDC) Offshore Export Cables. A full description of the Marine Scheme is provided in Volume 2, Chapter 5 Project Description. However, the detailed and final design of the Marine Scheme will be determined post-consent.

As outlined in Volume 2 Chapter 5 Project Description, has assumed that cable burial is expected to be possible across the majority of the Marine Scheme export cable corridor, cables will be buried to a minimum

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target depth of 0.5 m and only protected using external protection (e.g., rock berms) where minimum target burial depth is not achieved or at third-party crossings.

An Indicative Cable Burial Appraisal including parameters such as minimum and maximum target burial depths, has been undertaken. The Indicative Cable Burial Appraisal gives an indication of zones of the Offshore Export Cable Corridor where it may not be possible to achieve the minimum target burial depth of 0.5 m due to ground conditions (see section 5.6.5 of Volume 2, Chapter 5 Project Description for further detail). In these areas, additional cable protection may be required to ensure the cables are suitably protected.

1.3. Guidance and Legislation

The outline FCLP / FMMS has been developed with reference to the following key guidance covering both Scottish and English waters:


- Fisheries Act 2020 – Joint Fisheries Statement – Displacement Policy
- Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Offshore Renewables Developments. Recommendations for Fisheries Liaison, 2014;
- FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds, 2015; and
- Marine Scotland Guidance on preparing a Fisheries Management and Mitigation Strategy – Draft. 2020.
- Marine Scotland Good Practice Guidance for assessing fisheries displacement by other licensed marine activities, 2022.

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2. Fisheries Management and Mitigation Measures

Table 2.1: Designed in Measures Adopted as Part of the Marine Scheme of Relevance to Commercial Fishing

Mitigation Measure	Justification	Applicable Jurisdiction
Route Selection and Avoidance	<p>The Marine Scheme has been specifically refined to avoid interactions with key designations, environmental sensitivities, and notable inshore fishing grounds as far as reasonably practicable. On the approach to the Landfall at Cambois, the route has been selected to minimise the footprint within European Sites. Nearshore routes with greater levels of interactivity with European Sites along the English and Scottish coast have been de-selected.</p> <p>Further detail on this is provided in Volume 2, Chapter 6: Route Appraisal and Consideration of Alternatives</p>	Scottish and English waters
Appointment of a Company Fisheries Liaison Officer (CFLO)	<p>An CFLO is already in place and will continue to act as a specific point of contact to engage with and liaise with the fishing industry.</p> <p>A CFLO will be in place throughout the lifespan of the Marine Scheme.</p>	Scottish and English waters
Use of Offshore Fisheries Liaison Officers (OFLOs) where required and appropriate.	The use of OFLOs facilitates engagement with fisheries stakeholders during specific Project works and minimises potential for conflict between the Marine Scheme and fishing activities.	Scottish and English waters
Development of an FMMS / FLCP for MD-LOT and MMO approval, and in consultation with fisheries stakeholders.	<p>The FMMS/ FLCP details the Applicant's proposed approach to fisheries liaison and to facilitating co-existence, including details on the measures which are proposed to be implemented to reduce impacts on commercial fishing as far as practicable.</p> <p>An outline FMMS / FLCP has been provided as part of this application (Volume 5, Appendix 12.2) and will be updated for submission to MMO and MD-LOT prior to construction.</p>	Scottish and English waters
Participation in the Forth and Tay Commercial Fisheries Working Group (FTCFWG).	The FTCFWG provides a forum for information sharing and discussion of key issues with fisheries stakeholders and other developers in the region. Participation in similar groups in England will be explored.	Scottish and English waters
Cable Plan (CaP)	Suitable implementation and monitoring of cable protection through the Marine Scheme and adherence to a CaP. This will be produced and consulted on (in line with consent conditions) prior to installation and will include a detailed cable laying plan including geotechnical data, cable laying techniques and informed by a Cable Burial Risk Assessment (CBRA) which will include details on minimum target burial depths.	Scottish and English waters

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Mitigation Measure	Justification	Applicable Jurisdiction
Cable burial depth	Cables will be buried to a minimum target depth of 0.5 m and only protected using external protection (e.g., rock berms) where minimum target burial depth is not achieved or at third-party crossings. Application of target cable burial depth will reduce the potential for cable exposure from interactions between metocean regimes (e.g. wave, sand, and currents) and will reduce interaction with fishing gear. Cable burial also reduces risk of interference with magnetic position fixing equipment.	Scottish and English waters
Monitoring of cable burial and protection	Infrastructure will be monitored through post lay and burial inspection surveys to identify exposures and any requirements for repair and reburial, with remedial action taken as appropriate and as soon as practicable. Findings will be shared with the fishing industry in order to facilitate co-existence, prevent potential damage to and from fishing gear, and minimise potential safety risks.	Scottish and English waters
Development of a Code of Good Practice for contracted vessels.	Facilitates co-existence between vessels undertaking works for the Marine Scheme and fishing vessels and helps minimise potential adverse interactions.	Scottish and English waters
Undertaking of assessments to determine cable burial status.	Post lay and burial inspection surveys will be undertaken with remedial action taken as appropriate. In addition, an assessment to determine cable burial status (including cable protection) and identify potential changes to seabed conditions will be undertaken. Findings would be shared with the fishing industry where relevant.	Scottish and English waters
Promulgation of information (such as, position and nature of works, vessel routes, Safety Zones, advisory safe passing distances, navigational warnings) as required via Kingfisher Bulletins.	The construction of infrastructure and implementation of safety distances around construction vessels may displace recreation vessels. Likewise, maintenance and decommissioning activities may also displace recreation vessels. Circulation of information via Notices to Mariners (NtM), Kingfisher, Radio Navigational Warnings, Navigational Telex (NAVTEX), and/or broadcast warnings as soon as reasonably practicable in advance of and during the offshore works to inform the commercial fishing industry of vessels routes, timing and locations of construction works, and relevant details the construction activities. These will be augmented with NAVTEX and Radio Navigation Warning broadcasts as appropriate. Maximises awareness of the Marine Scheme allowing vessels to passage plan in advance, in the interests of safety to infrastructure and other users receptors.	Scottish and English waters
Adherence to appropriate guidance, with regards to fisheries liaison and mitigation (i.e. Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) guidance, as far as is applicable for a subsea cable).	Adherence to appropriate guidance, with regards to fisheries liaison and mitigation to facilitate the establishment of productive relationships with fisheries stakeholders and the implementation of an evidence-based approach to mitigation.	Scottish and English waters
Guard vessels and clearance distances.	Project vessels will implement a 500 m advisory safe passing distances with third party vessels during periods of construction or major repair or maintenance. During operation, where cable exposures exist that would result in significant risk, guard vessels will be used where appropriate until the risk has been mitigated by burial and/or other protection methods. Guard vessels will use Automatic RADAR Plotting Aid (ARPA) to monitor vessel activity and predict possible interactions whilst alongside the construction vessel(s). This facilitates engagement with	Scottish and English waters

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Mitigation Measure	Justification	Applicable Jurisdiction
	fisheries stakeholders during specific project works, reduces potential for interactions between the Marine Scheme and fishing activities, as well as maximising awareness of temporary hazards	
Development of suitable procedures to allow claims for loss or damage to gear.	Facilitates co-existence and minimises potential adverse interactions between Marine Scheme vessels and fishing activities.	Scottish and English waters
As-Built Information	The location, extent and nature of the cable protection measures used will be communicated to the relevant stakeholders including the UK Hydrographic Office (UKHO), relevant fishing industry representatives and Kingfisher Information Service. Provides information so all other legitimate users of the sea are aware of the location, extent and nature of cable protection..	Scottish and English waters
Cable protection.	The use of cable protection will be minimised as far as practicable, and only used where required. Additional external cable protection (e.g. rock placement) will only be used where the minimum target burial depth cannot be achieved, for example in areas of hard ground or at third-party crossings. This will be informed by outputs from the Cable Burial Risk Assessment completed by the installation contractor(s) prior to the commencement of installation. Rock utilised in berms will be clean with low fines. Use of graded rock and 1:3 profile berms at areas of rock protection will reduce potential fishing gear snagging risk.	Scottish and English waters

2.1. Communication and Information Transfer

The implementation of an appropriate communication and information transfer strategy is of key importance to help in minimising interference and facilitating effective co-existence with the fishing industry.


Key roles and responsibilities with regard to liaison with the fishing industry and the communication and information distribution plan anticipated to be implemented for the Marine Scheme are described as part of the role descriptions within Section 2.2.

2.2. Fisheries Liaison Roles and Responsibilities

THE APPLICANT

The primary responsibilities of the Applicant are anticipated to include the following:

- To identify and pro-actively engage with commercial fisheries stakeholders and statutory and non-statutory bodies and organisations that have the potential to be affected by the Marine Scheme;
- To actively continue liaison and consultation with the fishing industry through memberships of the commercial fisheries working groups;
- To formulate, agree and implement efficient communication channels for distributing project related information to stakeholders;
- To continue to give consideration to the concerns of commercial fisheries stakeholders in the formulation of mitigation strategies;

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- To maintain employment of an CFLO as the main point of contact for the Applicant and engage contracted FIRs as required throughout construction, operation and maintenance and decommissioning phases of the Marine Scheme;
- To promote productive co-existence through the early provision of construction and cable laying plans to fisheries stakeholders, including information on the type and location of cable protection measures where this may be required;
- Offshore Fisheries Liaison Officers (OFLO)s will be used where required and appropriate during the construction, and operation and maintenance phases;
- To produce and require implementation of both SSER and Contractor Standard Operating Procedures (SOPs) to minimise and appropriately manage potential interactions with fishing vessels; and
- To establish suitable and evidence-based cooperation agreement methodologies in line with FLOWW guidelines (FLOWW 2014; 2015).


COMPANY FISHERIES LIAISON OFFICER (CFLO)

A CFLO appointment will be maintained for the Marine Scheme. This will continue through pre-construction and construction and as required during critical phases of the Marine Scheme.

The principal role of the CFLO is to establish and maintain effective communications between the Applicant, any contractors or sub-contractors, fishermen and other users of the sea during the construction, operation and decommissioning of the Marine Scheme and to monitor compliance with good practice guidelines whilst doing so.

The primary responsibilities of the CFLO are anticipated to include the following:

- Provision of advice to the Applicant on fisheries liaison throughout the pre-construction and construction of the Marine Scheme;
- Organisation of, preparation for and attendance at fisheries meetings including Commercial Fisheries Working Groups (CFWGs), local fisheries stakeholder events and meetings with regulators, as required;
- Provision of advice to the Applicant on ongoing delivery of FCLP / FMMS;
- Act as a key point of contact for fisheries stakeholders and maintain availability to receive and respond to telephone and e-mailed enquires and statements from fishermen's representatives and individual fishermen, as well as the Applicant's enquiries;
- To develop and provide training for all vessel personnel to include induction and training for staff with specific fisheries liaison responsibilities;
- To maintain a fisheries stakeholder database to ensure all fisheries stakeholders are adequately informed of relevant project activities;
- Lead on the resolution of any fisheries related issues as they arise;
- Preparation of SOPs to help avoid and minimise interactions with fishing activities;
- Gather information with regards to fishing activities within the Marine Scheme and in its vicinity; and
- Assist and support the Applicant to facilitate the relocation of static fishing gear where this may be required.

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FISHING INDUSTRY REPRESENTATIVES (FIR)

As counterpart to the CFLO and often first point of contact for fishermen, the Fishing Industry Representative (FIR) will support the CFLO in their duties. FIRs will make skippers of fishing vessels aware of any forthcoming project operations and other on-going Marine Scheme activities.

Where relevant, membership of the Forth and Tay CFWG includes nominated FIRs representing local areas in the wider Forth and Tay area. In addition to the CFWG FIRs a project specific FIR is also in place with a focus on facilitating engagement with fishermen in English waters.

The primary responsibilities of the FIR(s) are anticipated to include the following:


- Be a primary contact point within the fishing community in their agreed remit, who can be trusted to accurately determine fishing industry views and objectively provide the developer(s) with this information;
- Ensure dissemination of information from the developer(s) and from CFWGs through associations, individual fishermen and other interested parties, across their agreed remit, subsequently allowing efficient feedback to the developer(s) or the developer's CFLO;
- Assist in circulation of Notice to Mariners and subsequent updates for project activities;
- Attend any CFWG meetings as required including preparation and through timely distribution of minutes, fulfilling relevant actions, and information received from the CFWGs;
- On invitation, attend public stakeholder engagement events.
- Contribute to maintaining and updating a fisheries register, held by developers, to cover all interested fishing parties within the FIR's agreed remit;
- Contribute to the population and/or verification of the commercial fisheries database;
- Provide impartial advice to the CFWGs, as required, regarding commercial fisheries activities in the FIR's agreed remit;
- Objectively and impartially assist with the collection of information from fishermen, within their agreed remit, regarding their activity in relation to developments;
- Keep a record of all communications with fishermen and developers; and
- Objectively, impartially and confidentially assist with damage to gear claims within their agreed remit.

OFFSHORE FISHERIES LIAISON OFFICER (OFLO)

OFLOs will be used where required and appropriate during the construction, and operation and maintenance phases of the Marine Scheme. OFLOs will facilitate engagement with offshore fisheries stakeholders during specific project works to minimise potential for conflict between the Marine Scheme and fishing activities.

The primary responsibilities of OFLOs are anticipated to include:

- To maintain regular contact with the CFLO and the Applicant and/or their contractors, as appropriate, concerning fishing vessel activity in and around the Marine Scheme;
- To maintain a watch for marine traffic and fishing vessel activity during marine operations and maintain regular contact with guard vessels and support vessels;
- To communicate with the vessel master in respect of providing any relevant information to fishing vessels, and, when the vessel is not engaged in marine operations, work with the vessel master to avoid, where reasonably practicable, fishing vessels actively engaged in fishing operations;
- To liaise with any fishermen who may have static gear deployed in areas relevant to the Marine Scheme and vessel transit routes;

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- To provide the required support to the CFLO in the handling of any claims by fishermen who may have static gear deployed in areas relevant to the Marine Scheme and vessel transit routes;
- To record details of any fishing activity in and around the Marine Scheme (including fishing vessels, gear and communications with fishermen) and of any events of infringement or movement or damage to static gear;
- To provide daily update reports via email to the CFLO and the Applicant; and

THE FORTH AND TAY COMMERCIAL FISHERIES WORKING GROUP

The principal purpose of a CFWG is to provide a forum for discussion on issues relating to commercial fisheries common to all offshore wind farm projects in the Forth and Tay region. The Applicant is currently a member of the Forth and Tay CFWG and will continue to participate in the group and will commit to joining other CFWGs which would be locally relevant to the Marine Scheme. The FCLP / FMMS, once finalised post-consent, will be shared with the CFWGs for consultation prior to approval.

MARINE COORDINATION CENTRE (MCC)

Prior to commencement of the construction phase, the Applicant will establish a Marine Coordination Centre (MCC), which will support the Marine Scheme's construction and operation and maintenance phase activities.

The MCC will monitor vessel activity in areas relevant to the Marine Scheme. The MCC will also be responsible for compiling Notices to Mariners (NtMs), Information to Sea Users Bulletins (Kingfisher Bulletin) and weekly notices of operations (WNoO) during construction. These will be issued to the CFLO who will then distribute these to the FIR and individual fishermen as required.

In addition, the MCC will provide a direct point of contact for fishing vessels when active in areas relevant to the Marine Scheme. Fishers can contact the MCC via marine radio channels or the MCC phone line.


2.3. Communications and Information Distribution

Disseminating appropriate and accurate information to all parties as early as possible and ensuring that effective lines of communication in relation to the Marine Scheme are maintained, is key to fostering an ongoing productive working relationship with fisheries stakeholders.

Appropriate communication channels will be established with fisheries stakeholders to ensure they are kept informed of offshore activities throughout the construction, operational and maintenance and decommissioning phases of the Marine Scheme. An outline of the anticipated schedule for the distribution of information to commercial fisheries stakeholders during the construction and operational and maintenance phases of the Marine Scheme is given in Table 2.2.

Table 2.2: Timescales for Distribution of Marine Scheme Information to Commercial Fisheries Stakeholders

Activity/information to be Disseminated	Timescale for Distribution
Site surveys	Notices and information distribution not less than 14 days prior to survey mobilisation (where feasible).
Construction activities	<p>Notice and information distribution as soon as reasonably practicable prior to commencement of offshore construction activities.</p> <p>For individual construction vessels, notice and information will be aimed to be provided not less than 14 days prior to vessel mobilisation (where feasible).</p>

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Activity/information to be Disseminated	Timescale for Distribution
Consultation meetings	Consultation meetings as required throughout the project life cycle.
Forth and Tay CFWG (and other CFWG as relevant)	Meetings approximately every two months or as required during the pre-construction, construction and operational phases.
Project updates	Project update circulated by e-mail or hard copy to fisheries stakeholders on a bi-annual basis or as needed by the Marine Scheme, or reasonably requested by stakeholders.
Unscheduled liaison	Additional unscheduled liaison and consultation would be undertaken by either the CFLO, the Applicant or the FIR (if applicable), as required, to address any issues and fishermen's concerns as they arise.

2.4. Safety Zones

'Safety zones' are understood to be applicable only to 'offshore structures' per The Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007, and therefore not applicable to subsea cables.

There will, however, be a 500 m advisory safe clearance zone around installation vessels. Cable repair vessels will also maintain a 500 m advisory clearance zone with third party vessels during periods of major maintenance (including reburial / protection of exposed cable).

2.5. Guard Vessels

It is anticipated that the provision of guard vessels will be the responsibility of the Applicant's contractors during construction, operation and maintenance and decommissioning phase activities, as appropriate. The guard vessels will support the OFLO in monitoring fishing activity and communicating with fishing vessels.

2.6. Reporting of Dropped Objects


A dropped objects at sea procedure which will be followed in the event that any objects are dropped at sea will be produced for the Marine Scheme in the interest of ensuring safety and minimising risks to fishing. The procedure will make reference to necessary reporting requirements.

2.7. Notice to Mariners

The Applicant will provide Notice to Mariners to provide information on indicative transit routes to and from construction/operation and maintenance ports and the Marine Scheme during pre-construction, construction, operation and maintenance and decommissioning phases providing at least two weeks' notice prior to any new vessels or activities mobilising on the site.

The document will provide information on the Applicant's approach to protecting the safety of vessels (including fishing vessels) during construction and operational phases of the Marine Scheme, including details on anchoring and potential sheltering arrangements.

The Applicant will consult with commercial fisheries stakeholders on indicative transit routes and any potential shelter areas and will advise contractors vessels of any concerns raised.

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2.8. Code of Good Practice for all Vessels

Contractors appointed by the Applicant will be required to follow a code of good practice to ensure external communication is accurate and to aid co-existence with the fishing industry. It is anticipated that the code of good practice will include the following considerations:


- Ensure that any project related debris accidentally dropped during construction / operation and maintenance activities is removed as practicably and safely, as is feasible, and reported as appropriate;
- Ensure all vessels under contract for the Marine Scheme adhere to the International Regulations for Preventing Collisions at Sea (COLREGs) and Safety of Life at Sea (SOLAS) requirements;
- All vessels under contract with the Marine Scheme will maintain polite, proactive and professional communications with fishing vessels during offshore operations;
- All vessels under contract with the Marine Scheme will monitor at all times the required VHF channels so as to receive communications directly from fishing vessels;
- All vessels contracted to undertake work for the Marine Scheme will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gears;
- All vessels contracted by the Applicant will have on board fishing liaison/interaction manuals;
- Where appropriate, suitably qualified and certified OFLOs will be on board certain survey or construction vessels; and
- Vessels transiting to the Marine Scheme shall follow transit routes as defined in Notice to Mariners where safe and practicable to do so.

2.9. Procedures in Relation to Gear Fastening or Loss

The following procedure replicates that which has been in place in respect of the UK offshore oil & gas industry and describes the steps that should be undertaken in the event of fishing gear becoming fastened within the Marine Scheme:

- 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.
- The fishing vessel should advise the coastguard, giving an accurate position of the vessel and/or lost gear.
- If the coastguard confirms that the vessel is in the immediate vicinity of a cable or wind farm related infrastructure, serious consideration will be given to the slipping of the gear and buoying and recording its position.
- After buoying off the gear, the position should be confirmed with the coastguard and the CFLO.
- On return to port, contact the local Fishery Office and register the incident in the normal manner.
- Complete a gear loss form and forward it to the CFLO.
- On no account should skippers grapple in an attempt to recover fishing gear lost or cut away in the vicinity of the inter-array or export cables.

Information on navigational safety measures and a summary of emergency responses and coordination arrangements for the construction and operation and maintenance phases of the Marine Scheme are expected to be included within the NSP.

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2.10. Assessment of Burial Status of Cables and Changes to Seabed


The Applicant is committed to the undertaking of assessments to determine the burial status of cables (including cable protection) and potential changes to the seabed. These would be aimed at facilitating co-existence with fishing and minimising snagging risk and associated loss or damage to fishing gear and safety issues. The findings of these assessments would be shared with the fishing industry and the need for further survey work will be discussed between the Applicant and the fishing industry.

2.11. Lobster and Crab Fishery Specific Measures

The management and mitigation measures outlined in sections 2.1 to 2.11 are applicable to all fisheries active in areas relevant to the Marine Scheme. This section outlines additional fishery specific measures of relevance to the lobster and crab fishery.

It is the intention of the Applicant to promote co-existence and minimise potential disruption to normal commercial fishing practices. It is recognised, however, that there may be instances where the relocation of static fishing gear may be necessary as a result of survey or construction works. Where this is the case, the Applicant will seek to enter into appropriate, justifiable and evidence-based cooperation agreements with affected fisherman.

This will be undertaken following an evidence-based approach taking account of existing good practice guidance (i.e. FLOWW guidance). As described in FLOWW guidance (FLOWW, 2014) “*Commercial compensation should only be used as a last resort when there are significant residual impacts that cannot otherwise be mitigated. Compensation should only be paid on the basis of factually accurate and justifiable claims. There is therefore an obligation upon affected fishermen to provide evidence (such as three years’ worth of catch records and VMS data) to corroborate any such claims*”.

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FLOWW (2014). FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Liaison.

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