Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Fisheries Mitigation Monitoring and Communication Plan, Volume 3

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1 INTRODUCTION

1.1 PURPOSE

1.1.1.1 This Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) has been produced by Environmental Resources Management (ERM) for Spiorad na Mara Ltd (hereafter referred to as `the Applicant`), who is proposing to develop the Spiorad na Mara Offshore Wind Farm (OWF), off the west coast of the Isle of Lewis/*Eilean Leòdhais*, Scotland/*Alba* (hereafter referred to as 'the Offshore Project'). **Plate 1-1** provides an overview of the Offshore Project.

1.1.1.2 The purpose of this document is to:

- Describe the Applicant's proposed approach to fisheries liaison and mitigation for the Offshore Project, as of this stage of pre-application/application phase of the development;
- Provide a description of the main measures which have been proposed to enable co-existence with commercial fishing, as well as to minimise any potential impacts throughout the construction, operation and maintenance (O&M), and decommissioning phases of the Offshore Project. This includes the consideration of commitments made in **Chapter 21: Commercial Fisheries, Volume 2a** of the Offshore Environmental Impact Assessment Report (EIAR).

1.1.1.3 The FMMCP guidance was updated in January 2025, following the previous guidance on Fisheries Management and Mitigation Plan. This FMMCP is an evolving live document and will be updated and reviewed at agreed intervals throughout the Offshore Project lifecycle. As the Offshore Project design matures and is adopted post-consent, ahead of construction, and following approval by Scottish Ministers, the document will be updated when required, where monitoring and/or evidence from commercial fisheries engagement indicates changes are needed. The FMMCP will be subject to document control, agreement with stakeholders and Marine Directorate Licensing Operation Team (MD-LOT). The latest version will be available on the Scottish Government website.

1.1.1.4 Although not endorsed by Scottish fisheries organisations; the importance of minimising OWF related disturbance to existing fishing activities is well defined within Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Offshore Renewables Developments. Recommendations for Fisheries Liaison, 2014 and updated FLOWW Best Practice Guidance, 2025:

"The overall objective is for developers to use best endeavours to progress their projects with as little disturbance as possible to fishing activities, whilst keeping fishermen as informed as possible. In turn,

the fishing community should provide accurate information to developers on the nature of fishing activity operating in the area".

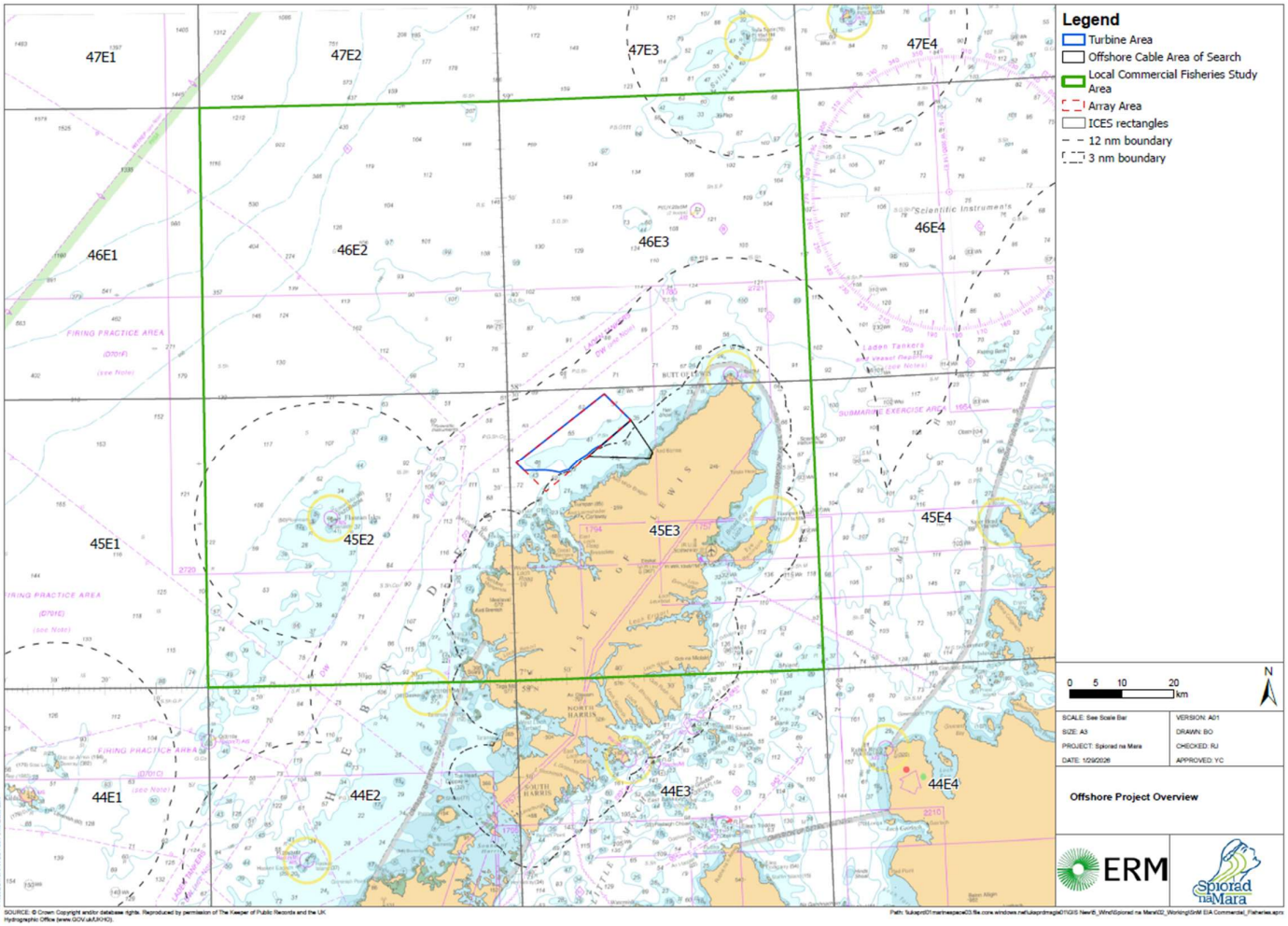


Plate 1-1 Offshore Project Overview and Commercial Fisheries Study Area

1.2 PROJECT DESCRIPTION

1.2.1.1 The Applicant is proposing to develop the Project which comprises of both offshore and onshore components. The Project is an OWF that will consist of up to 60 fixed-bottom WTGs. The Project will generate and transmit renewable electricity to the National Grid. The Applicant has a connection agreement with Scottish and Southern Electricity Networks (SSEN) for a connection to the grid network on mainland Scotland/*Alba* via SSEN's Alternating Current (AC) Substation and High-Voltage Direct Current (HVDC) Converter Station (referred to as the SSEN Lewis Hub). **Table 1-1** summarises key Offshore Project parameters. Further information about the Offshore Project is presented in **Chapter 3: Project Description, Volume 1a** and is available on Spiorad na Mara's website (Northland Power, 2025).

Table 1-1 Key Offshore Project Parameters

Offshore Project Parameter	**Value or Range**
Array Area	161 km^2
Turbine Area	140.5 km^2
Water depth	The water depths across the Turbine Area range from 37 m-67 m with the southwest corner of the Array Area reaching 72 m.
Anticipated number of WTGs	Up to 60
Wind Turbine Generator (WTG) type	Fixed foundations
Potential start of construction	2028/2029
Construction period	Up to 5 years
Fully operational	Expected 2032/2033
Expected operational lifetime	35 years

1.3 GUIDANCE AND DRIVERS

1.3.1.1 This FMMCP has been created with reference to the following key guidance:

- Marine Scotland Guidance on preparing a Fisheries Management and Mitigation Strategy – Draft. 2020;
- FLOWW Best Practice Guidance for Offshore Renewables Developments. Recommendations for Fisheries Liaison, 2014 and updated FLOWW Best Practice Guidance, 2025;
- FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds, 2015;
- Collaborative Offshore Wind Research into the Environment (COWRIE) Options and Opportunities for Marine Fisheries Mitigation Associated with Windfarms, 2010;

- Marine Scotland Good Practice Guidance for assessing fisheries displacement by other licensed marine activities, 2022;
- Scotland's National Marine Plan, 2015;
- Marine licensing and consenting: offshore renewable energy projects mitigation and monitoring plans, 2025.

1.3.1.2 The FMMCP will be issued for consultation and discussions with relevant organisations, statutory bodies and fishers within the area surrounding the Offshore Project. Where necessary, this document will be updated to reflect any potential changes to guidance, legislation and/or consent conditions.

1.3.1.3 The Scottish Fishermen's Federation (SFF) and its affiliated Associations have withdrawn from the FLOWW process. No alternative SFF endorsed guidance is currently available. The Applicant will continue to follow the existing FLOWW guidance and will revisit this approach if new guidance is issued. However, the Applicant will not rely on, or reference, FLOWW guidance in the remainder of the FMMCP and will instead set out the Offshore Project's fisheries liaison, mitigation, monitoring and communication procedures and relevant policies directly, rather than cross-referring to FLOWW, in order to respect the SFF's position.

1.4 CONSULTATION

1.4.1.1 A full account of consultation undertaken by the Applicant pre-submission can be viewed within Section 21.3 of **Chapter 21, Volume 2a**.

1.4.1.2 An account of post- scoping consultation applicable to the drafting of this document is provided in **Table 1-2**.

Table 1-2 FMMCP Consultation

Consultee	Date / Document	Comment
SFF and Scottish Whitefish Producers Association (SWFPA)	September 2024/In-person meeting	SFF and SWFPA advised on data sources and updated guidance. Keen to be involved in development of the FMMCP.
Orkney Fishermen's Association (OFA)	October 2024/ Teams meeting	OFA are interested in effects of both the Array Area and cabling on fisheries access, and in ecology effects.
OFA	October 2024/ Teams meeting	OFA queried what monitoring will be undertaken and what measures will be implemented based on the results of that monitoring, if the Offshore Project is shown to impact fishing vessel activity.

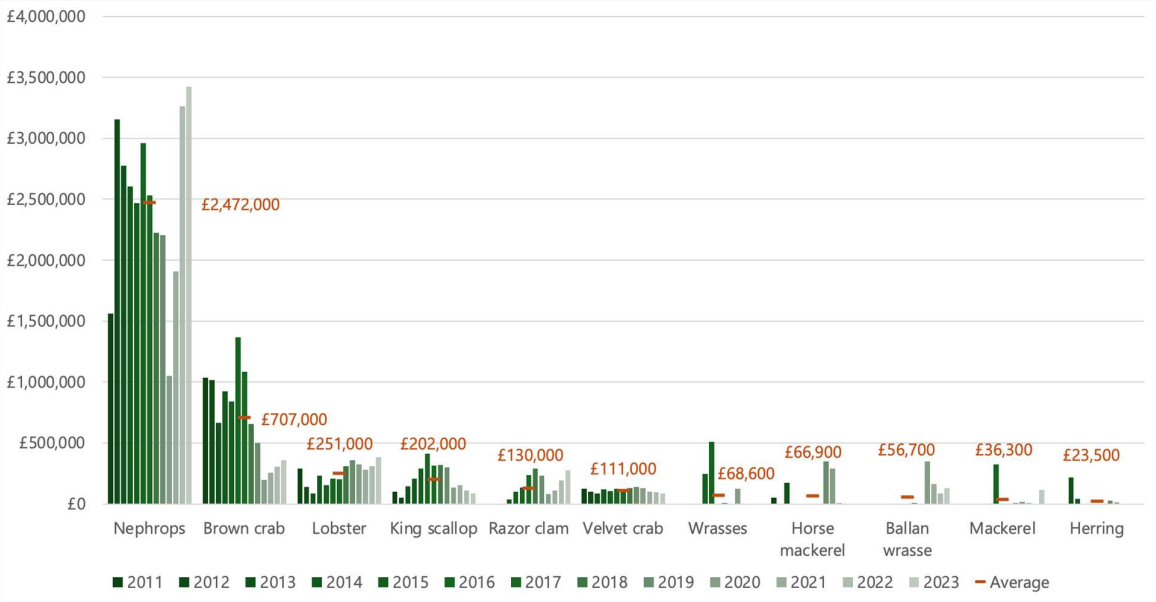
Consultee	Date / Document	Comment
OFA	October 2024/ Teams meeting	OFA is keen to have sight of the Commercial Fisheries Technical Report (see **Appendix 21.1: Commercial Fisheries Baseline Characterisation Report, Volume 2c**) ahead of formal application submission.
SFF and SWFPA	July 2025/ In-person meeting	Meeting to present updated baseline data and Offshore Project updates. Discussions on the development of the FMMCP. Concern was raised over the inclusion of up to 12 export cables being surface laid.
Scottish Pelagic Fishermen's Association	July 2025/ Teams meeting	Meeting to present updated baseline data and Offshore Project updates. Discussions on the development of the FMMCP. It was confirmed that the Study Area is not routinely targeted by Scottish pelagic trawl vessels, though is an important transit route for UK and Norwegian pelagic trawl vessels.
Western Isles Fishermen's Association (WIFA) and Outer Hebrides Regional Inshore Fisheries Group (RIFG)	September 2025/In-person meetings	Meeting to present updated baseline data and Offshore Project updates. Discussions on the development of the FMMCP.
SFF and SWFPA	October/November 2025	Further discussion on the FMMCP.
OFA	December 2025	Further discussion on the FMMCP.

2 OVERVIEW OF FISHERIES ACTIVITY

2.1.1.1 The following section provides an overview of commercial fishing activity in the Commercial Fisheries Study Area (hereafter referred to as 'Study Area'), as illustrated in **Plate 1-1.** A full overview of commercial fisheries activity is described in **Appendix 21.1, Volume 2c.**

2.1.1.2 Landings within the Study Area are dominated by shellfish species with *Nephrops* accounting for the most economically important species, with an average annual value of £2.47 million, based on 2011-2023 timeseries within the Study Area (see **Plate 2-1**).

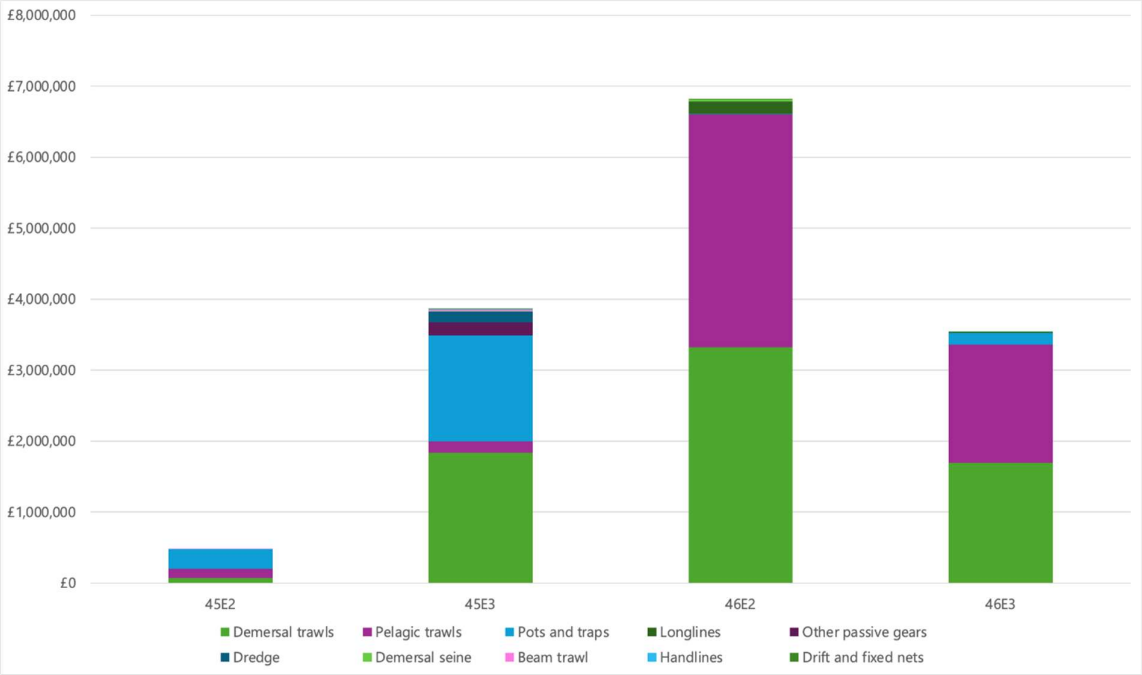
Plate 2-1 Key species by annual landed value (GBP) (2011 to 2023) from the commercial fisheries local study area (MMO, 2022; MMO, 2024)



2.1.1.3 Three main fishing methods are associated with landings from the Study Area; demersal trawls, pots and traps (creels) and pelagic trawls. Trawling was recorded as the method for which the greatest fishing effort is applied (see

2.1.1.4 **Plate** 2-2).

Plate 2-2 Average annual landed weight (tonnes) (2019 to 2023) by ICES rectangle from the commercial fisheries regional study area indicating gear type (MMO, 2022; MMO, 2024). [Data includes all UK vessels landing into UK and non-UK ports and non-UK vessel landings into UK ports]



2.1.1.5 Data presented above cover the entirety of the Study Area; more detailed analysis as presented in **Appendix 21.1, Volume 2c**, which indicates that fishing effort and landings from the Array Area and Offshore Cable Area of Search (OCAS) are low relative to the broader Study Area, which comprises ICES rectangles 45E3, 45E2, 46E2 and 46E3.

3 COMMUNICATION AND FISHERIES LIAISON

3.1.1.1 This section describes the Applicant's proposed approach to communication, and fisheries liaison to be utilised in order to minimise any impacts on fishing activities and, where possible, enable co-existence between the Offshore Project and commercial fishing activity.

3.2 FISHERIES LIAISON ROLES AND RESPONSIBILITIES

3.2.1 THE APPLICANT

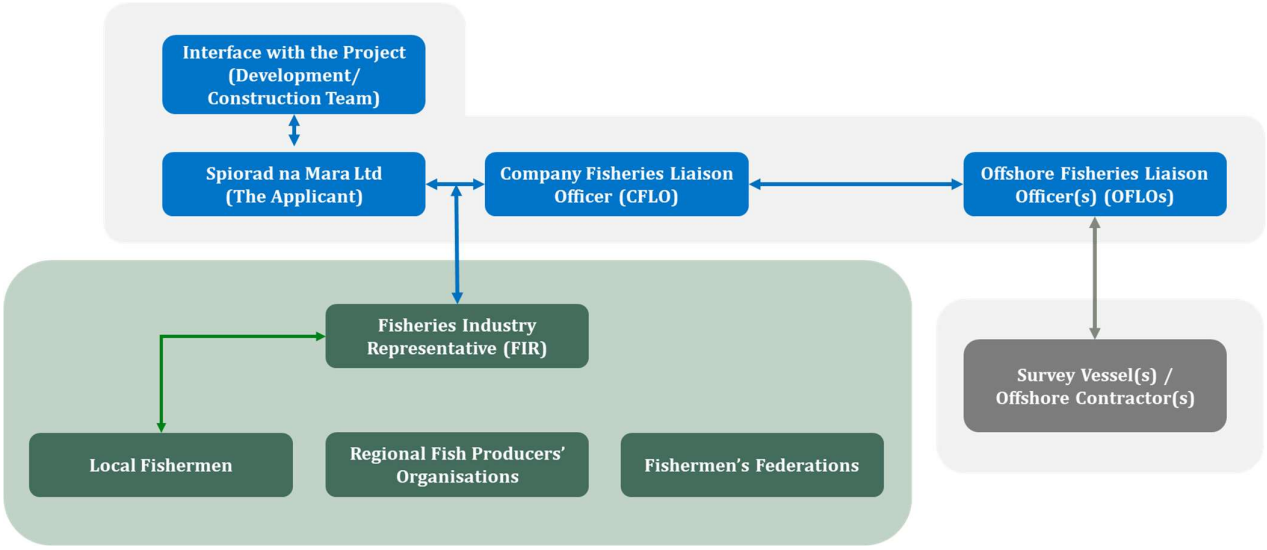
3.2.1.1 The Applicant will have overall responsibility for ensuring that well-planned, robust fisheries liaison is undertaken and that any measures proposed are implemented successfully. This is achieved through this FMMCP, which will be updated as/when required, e.g. if there any significant changes to fishing activities post-consent.

3.2.1.2 The other key element of ensuring successful fisheries liaison will be to appoint and/or facilitate the appointment of the following key roles:

- Company Fisheries Liaison Officer (CFLO);
- Fishing Industry Representative (FIR);
- Offshore Fisheries Liaison Officers (OFLO).

3.2.1.3 **Plate 3-1**Error! Reference source not found. illustrates how these roles interact with one another and interface with Offshore Project survey vessels/offshore contractors and the wider fishing industry.

Plate 3-1 Fisheries Liaison Roles



3.2.1.4 The Applicant has committed to establishing and participating in a Offshore Project specific Commercial Fisheries Working Group (CFWG) and a Marine Coordination Centre (MCC). These,

alongside the above roles are discussed below in Section 3.2.2, 3.2.3, 3.2.4, 3.2.5 and 3.2.6 and in **Table 4-1**.

3.2.2 COMPANY FISHERIES LIAISON OFFICER

3.2.2.1 A CFLO is the primary point of contact for the fishing industry when direct communication with the Applicant is required. During the survey and construction phase, the CFLO can ensure the timely provision of information regarding programmed vessel movements or delays. In addition, this communication channel also facilitates dissemination of information, for example urgent bulletins in the event of any marine hazards (e.g. loss of plant onto the seabed).

3.2.2.2 The CFLO's main responsibilities are to:

- Prepare an invitation for fishermen to self-nominate onshore FIRs for their region;
- Prepare a General Data Protection Regulation (GDPR) statement (regarding the holding of fishermen's personal data);
- Facilitation of evidence-based disruption and damaged gear claims;
- Establish OFLO email and duty phone (for use during active offshore works) and place these on the Offshore Project website;
- Monitoring of fisheries activities via Automatic Identification System (AIS), vessel tracking and local engagement to alert the Applicant to potential risks and provide periodic desk-based monitoring of fishing operations surrounding the project area;
- Develop and maintain commercial fisheries stakeholder database/consultation trackers, and other commercial fisheries specific documentation to ensure pro-active communication;
- Work with the WIFA , the SFF and other similar organisations, to propose member organisations to be contacted and invited to join a project-specific CFWG (such groups have been created for other OWF projects but it is non-mandatory. They should only be proposed if the local fishing industry views it as a sensible and time-effective way to liaise with an Applicant);
- Prepare and maintain an electronic distribution list for the dissemination of Notices to Mariners (NtM) and Notices to Fishermen (NtF);
- Prepare and disseminate NtMs and NtFs to commercial fisheries stakeholders when appropriate and work closely with the project MCC to ensure fishing activity is monitored and conflicts are avoided;
- Where so required, draft specific fisheries liaison text for inclusion in an Offshore Project website, onto which Offshore Project notices, invitations, consultation meeting minutes, CFWG minutes and NtFs will be placed;
- Active participant in the CFWG and maintain and update the FMMCP to align with monitoring and/or evidence from engagement with the CFWG and wider stakeholders at agreed intervals.

3.2.3 FISHING INDUSTRY REPRESENTATIVE

3.2.3.1 The FIR serves as a counterpart to the CFLO, as well as typically being an initial contact for fishermen. The Applicant will engage with the local fishing industry in the process of identifying and appointing the role of FIR when required. FIRs notify fishing vessels of upcoming Offshore Project related operations and activities, and act as a conduit for information from fishermen to the Applicant.

3.2.3.2 The FIR's main responsibilities include:

- Serving as the main point of contact for the fishing community and being sufficiently trusted by the fishing industry to establish the opinions of the fishing industry whilst being able to objectively provide this information to the Applicant and/or the CFLO;
- Exchange of information between the Applicant, CFWGs (if established), individual fishermen and other relevant individuals/organisations, and enabling efficient feedback to be sent to the Applicant and/or the CFLO;
- Ensuring NtMs, and the updates, thereafter, are sent to relevant parties;
- Being present at Commercial Fisheries Working Group (CFWG) meetings (if a CFWG is established), and preparing and distributing minutes, completing relevant agreed upon actions, and relaying information received from the working group;
- Attending public stakeholder engagement meetings, upon invitation;
- Participate in the maintenance and updating of a fisheries register, which will be owned by the Applicant and will include information relating to all interested fishing parties present in the agreed remit of the FIR;
- Participate in completing and/or verifying the commercial fisheries database;
- Giving impartial advice related to commercial fisheries activities in the FIR's remit to the FWG where necessary;
- Collect information from fishermen in their agreed remit related to fishing activity in an objective and impartial manner;
- Record and maintain the details of all communications with fishermen and the Applicant/CFLO;
- Provide objective, impartial and confidential assistance with any potential fishing gear damage claims.

3.2.4 OFFSHORE FISHERIES LIAISON OFFICERS

3.2.4.1 The purpose of using OFLOs is to make sure the crews of all construction or guard vessels have instant access to an appropriately skilled and experienced individual, with relevant knowledge of the local fisheries which may be affected by offshore works. The main role of the OFLO is to serve as a point of communication between the contractors and the fishing vessels that are active offshore as/when any project-related offshore works are being undertaken, i.e. surveys/construction/operations, maintenance, and decommissioning activities. The OFLO will exchange information related to the progress of any offshore vessels, including specific reference

to any safety zones and/or voluntary exclusion zones on behalf of the Applicant to any local fishing vessels.

3.2.4.2 Other responsibilities of the OFLO include:

- Ensure frequent contact with the CFLO and the Applicant and/or their contractors and escalates any safety or urgent concerns;
- Maintain regular contact with guard and support vessels whilst monitoring marine traffic and vessel activities in the area;
- Establish communication with the vessel captains regarding the sharing of pertinent information with fishing vessels, during periods when the vessel is not involved in maritime activities, collaborate with the vessel's captain as much as possible to avoid fishing vessels currently operating nearby;
- Coordinate with any fishermen who may have stationary equipment positioned in areas pertinent to the Offshore Project and vessel transit paths;
- Provides offshore survey and construction crews with information on local fishing operations and practices, highlighting methods of working to minimise conflict;
- Create and deliver training for all vessel personnel, which encompasses induction and specialised training for staff assigned with fisheries liaison responsibilities;
- Document information related to fishing activities within the vicinity of the Offshore Project, which encompasses fishing vessels, equipment, interactions with fishermen, as well as any instances of violations, relocation, or damage to stationary gear;
- Maintain monitoring of fisheries activity offshore and record fisheries vessel activity within a Fisheries Activity Log which will be shared daily with the CFLO and the Applicant.;
- Participate in meetings, as necessary, with Applicant staff and the CFLO.

3.2.5 COMMERCIAL FISHERIES WORKING GROUP

3.2.5.1 It is recognised that in some cases the implementation of a CFWG specific to an OWF project can be a very useful and convenient way of meeting all fisheries stakeholders on a regular basis and disseminating information that may be of interest to them, e.g. proposed survey timings; construction start dates etc. The Applicant is aware of the potential benefits of such a group and have committed to establish and participate in a Project specific CFWG to facilitate liaison between the Offshore Project and the wider fishing community.

3.2.5.2 To ensure transparency and coordination with commercial fisheries stakeholders the Applicant will use the CFWG as a forum to share information and collaborate when drafting or updating the following plans:

- Fisheries Mitigation, Monitoring and Communication Plan (FMMCP);
- Offshore Environmental Management Plan (OEMP);
- A Lighting and Marking Plan (LMP);
- Invasive Non-Native Species (INNS) Management Plan;

- Marine Pollution Contingency Plan (MPCP);
- Navigational Safety and Vessel Management Plan (NSVMP);
- Design Specification Layout Plan (DSLP);
- Decommissioning Plan (DP).

3.2.6 MARINE COORDINATION CENTRE

3.2.6.1 The Applicant has also committed to establish a MCC. The purpose of the MCC will include:

- To monitor all vessel activity (Offshore Project, fishing and other maritime vessels) in areas related to the Offshore Project;
- To draft/issue (when required) NtMs, Information to Sea Users Bulletins, and weekly notices of operations, throughout the construction phase. These documents will be sent to the CFLO who will then issue to the FIR and individual fishermen where necessary;
- To serve as a main contact point for fishing vessels which are active in areas related to the Offshore Project. Fishing vessels to be able to contact the MCC using marine radio channels or the dedicated MCC phone number.

3.3 COMMUNICATIONS AND INFORMATION TRANSFER AND DISTRIBUTION

3.3.1.1 Key to successful fisheries liaison will be the use of a robust, suitable communication and information transfer strategy between the Applicant and commercial fishing stakeholders. This is highly important as it will contribute positively towards enabling effective co-existence with the fishing industry. Ensuring that a number of key roles related to fisheries liaison are filled (and that their associated responsibilities are understood by all parties) will be important in underpinning such communication. Timely sharing of appropriate and reliable information with all relevant parties, and maintaining efficient channels of communication regarding the Offshore Project, will further enable continuous and beneficial collaboration with fisheries stakeholders.

3.3.1.2 Suitable means of communication with fisheries stakeholders will be created, to ensure they remain updated on offshore operations during the pre-construction, construction, O&M and decommissioning phases of the Offshore Project.

3.3.1.3 The Applicant will endeavour to distribute information in accordance with the timescales identified in

3.3.1.4 **Table** 3-1 and will use multiple communication routes in order to not solely rely on federations as the dissemination path.

Table 3-1 Timescales for distribution of 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	Notice and information distribution as soon as reasonably practicable prior to commencement of offshore construction activities. For individual construction vessels, the Applicant will aim to provide notice and information not less than 14 days prior to mobilisation (where feasible).
Consultation meetings	Consultation meetings as required throughout the project lifecycle. Timing and means of notification of consultation meetings will be determined with input from the FIR.
CFWG	Regular meetings should be scheduled throughout pre-construction, construction and O&M phases. This frequency will be reviewed and modified as desired by the fishery members of the CFWG.
Offshore Project updates	Offshore Project update summaries to be circulated by e-mail or hard copy to fisheries stakeholders when required. If there are important issues which arise, or a reasonable request from fisheries stakeholders, additional updates could be circulated. During active construction periods, weekly Offshore Project updates will be disseminated via a number of channels (email/hard copy/website and link to NtMs/Kingfisher/KIS-ORCA) and will include key construction information such as, vessel lists, active areas, installation activities, timing and duration of works and any future works.
Unscheduled liaison	Additional unscheduled liaison and consultation would be undertaken by either the CFLO, the Applicant or the FIR, as required, to address fishermen's concerns as they arise.

3.4 SAFETY ZONES

3.4.1.1 It is anticipated that the Applicant will apply for the following Safety Zones under Section 95 of the Energy Act 2004 and in accordance with Schedule 16 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007:

- *Construction*:
  - 500 m safety zones around the outer edge of the proposed WTG (and offshore substation platform(s) if required) locations where construction activities are underway;

- A 50 m pre-commissioning safety zone at infrastructure where construction is not on-going, prior to wind farm commissioning.
- *O&M*:
  - 500 m operational safety zones around the location of any major maintenance activities e.g. WTG gearbox replacement.

3.4.1.2 The wording of the Energy Act 2004 and associated Regulations does not extend to the cable elements of the Offshore Project, therefore, rather than formal safety zones be implemented around cable installation vessels, 500 m voluntary exclusion zones will be implemented instead. These will have the same effect of aiming to minimise the risk of adverse interactions between vessels working on the Offshore Project and any fishing vessels active in this area.

3.4.1.3 The Applicant will issue advised safe working distances for other active works where formal safety zones do not apply; for example, around construction vessels laying cables. Advised safe working distances will be temporary and up to 500 m radius around vessels undertaking active Offshore Project works.

3.4.1.4 Information relating to safety zones will be distributed via NtMs, the Seafish "Kingfisher" system, the FIR, OFLOs, at regular intervals as described in

3.4.1.5 **Table** 3-1.

3.5 GUARD VESSELS

3.5.1.1 Guard vessels can contribute to safe construction by communicating with other sea users who are potentially encroaching upon the site. The guard vessel(s) will also exchange information on fishing activity and static fishing gear location within the area with the OFLO and CFLO. Finally, guard vessels will also be used to mark specific areas that should be avoided.

3.5.1.2 Guard vessels will be considered for the Offshore Project at particular times, for example when project vessels are engaged in sensitive construction operations or if partially completed structures are present and could represent a risk to third-party vessels. During these periods, the construction area may be monitored by guard vessel(s) to further protect the area and to provide additional information to third-party vessels.

3.5.1.3 The decision(s) on if/when to use a guard vessel will be informed by a risk assessment of the activities undertaken by the Applicant.

3.5.1.4 Details of the guard vessels and their operating patterns will be distributed via NtMs, the Seafish "Kingfisher" system, the FIR, OFLOs, and those relevant bodies identified in

3.5.1.5 **Table** 3-1.

3.6 REPORTING OF DROPPED OBJECTS

3.6.1.1 If an object related to the Offshore Project is accidentally dropped at sea, guidance on accidental deposits in the Scottish marine area will be followed to maintain safety and reduce the risks to fishing vessels. Procedures to be followed are as identified in Marine Scotland - Guidance on preparing a Fisheries Management and Mitigation Strategy, 2020 (Section 5.5.5 and Appendix 1).

3.6.1.2 The Applicant will also notify Marine Directorate Licensing Operations Team (MD-LOT) as soon as possible after becoming aware of the incident. If this object is considered to be a risk to navigation, a NtM will be issued when the object's location is identified. Additionally, an 'accidental deposit of an object at sea reporting form' will be submitted to MD-LOT, and any other relevant stakeholders, as soon as possible. Furthermore, any additional actions deemed to be required, after consultation with MD-LOT, will be communicated via an NtM.

3.6.1.3 Details of the dropped objects with the potential to impact negatively on fishing gear will be distributed via NtMs, the Seafish "Kingfisher" system, the FIR, OFLOs, and those relevant bodies identified in

3.6.1.4 **Table** 3-1.

3.7 OFFSHORE NAVIGATIONAL SAFETY AND VESSEL MANAGEMENT PLAN (INCLUDING TRANSIT AND SHELTER AREAS)

3.7.1.1 A NSVMP will be created by the Applicant (building on the **Outline NSVMP, Volume 3**), which describes potential transit paths to and from the construction, preferred shelter areas, O&M ports, as well as the Offshore Project itself.

3.7.1.2 The NSVMP will explain the Applicant's strategy for the maintenance of vessel safety, which includes fishing vessels, throughout the construction and O&M phases of the Offshore Project. The document also describes potential sheltering and anchoring areas.

3.7.1.3 The Applicant will engage in discussions with commercial fisheries stakeholders concerning suggested transit routes and possible shelter locations and will inform contractor vessels of any raised concerns.

3.8 CODE OF GOOD PRACTICE FOR ALL VESSELS

3.8.1.1 Any vessels contracted by the Applicant to conduct construction and survey work will be defined according to their manoeuvrability as per Rule 3g of the International Regulations for the Prevention of Collisions at Sea (COLREGs) (as implemented in the UK by The Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996, also rule 3g), and the Code of Good Practice for Spiorad na Mara Contracted Vessels. Furthermore, the Code of Good Practice is expected to include the following requirements:

- Fishing liaison/interaction manuals will be present onboard all vessels contracted by the Applicant;
- Vessels on route to the Offshore Project must adhere to transit routes as described in the final NSVMP, provided it is safe and practicable to do so;
- Any debris related to the construction, O&M and decommissioning of the Offshore Project must be removed, as long as it is safe and practicable to do;
- Suitably qualified OFLOs should be present on certain survey and construction vessels where appropriate;
- All vessels contracted to the Offshore Project must adhere to the requirements of the COLREGs and Safety of Life at Sea (SOLAS);
- All vessels contracted to the Offshore Project must maintain professional, polite and useful communications with other sea users, particularly fishing vessels during offshore operations;
- All vessels contracted to the Offshore Project must monitor the appropriate Very High Frequency (VHF) radio channels at all times to ensure communications from fishing vessels are received directly;

- Appropriate risk assessments regarding potential interactions with commercial fishing vessels and their gears must be undertaken for all contracted vessels.

3.9 PROCEDURES IN RELATION TO GEAR FASTENING OR LOSS

3.9.1.1 Fishermen need to be extremely careful when fishing in the vicinity of offshore renewable energy structures and cables and must ensure that they are using the latest information in respect of location of infrastructure and maintaining a suitable separation distance.

3.9.1.2 The primary aim in the event of fouling of fishing gear is to avoid danger to the vessel, those on board, and any infrastructure that the fishing gear may have fouled. To this end:

- Excessive winch, line, net hauler loads, or engine power should not be used to retrieve stuck equipment, if it is not easily retrieved;
- If the vessel is in close proximity to cable or wind farm infrastructure, careful thought must be given to releasing the equipment, marking its location, and documenting the incident;
- Grappling in an attempt to retrieve lost fishing gear close to the Array Cables to Final WTG or Array Cables to Landfall must not be carried out;
- If it is not possible to safely free and retrieve the fouled gear, it should be marked with suitable buoys, the location noted, and the gear released.

3.9.2 EMERGENCY PROTOCOL

3.9.2.1 As soon as possible, the vessel skipper is to inform the CFLO and FIR of the incident. The local Marine Scotland Fishery Office should also be informed. This is likely to be the Stornoway/*Steòrnabhagh* office:

Stornoway Fisheries Office
Customs House
Quay Street
STORNOWAY
HS1 2XX
Tel: 0300 244 8702
E-mail: FO.Stornoway@gov.scot

3.9.3 CLAIMS PROCESS FOR LOST OR DAMAGED GEAR

3.9.3.1 Reporting forms, as per Appendix 2 of 'Marine Scotland - Guidance on preparing a Fisheries Management and Mitigation Strategy, 2020' are to be completed as soon after the incident as practical. CFLO and FIR will assist the skipper in completion of these forms, if desired.

3.10 CO-OPERATION AND DISRUPTION PAYMENTS

3.10.1.1 The procedures associated with any potential Co-operation and Disruption Agreements are detailed within the Spiorad na Mara 'Commercial Fisheries Engagement and Disruption Strategy'. This document has been produced using industry best practice and understanding fishing activities through stakeholder engagement. Further engagement in regard to Co-operation and Disruption agreements will be carried out post-consent.

3.10.1.2 The aim of the Commercial Fisheries Engagement and Disruption Strategy is to coordinate cooperation and establish evidence-based disruption payments where significant impacts are identified in the EIAR. The document may contain personal data and/or individuals fishing activities and will not be available publicly.

3.10.1.3 Key principles of disruption payments:

- Any discussion on potential disruption payments should be underpinned by the aim that any settlement is evidence based to achieve a position whereby fishing interests are neither advantaged nor disadvantaged by the renewable energy installation Blyth-Skyrme, R.E. (2010);
- The circumstances of the loss of earnings being accounted for will be vessel specific;
- Any disruption payments should take full account of time to move/re-set gear. It may take several days to clear all gear from the area, and weather conditions may delay access, adding further time to this activity. Similarly, it may take several days to redeploy gear once the survey activity is complete. It is, therefore, recommended that an appropriate reference period is agreed to enable all associated activities to be completed.

4 MITIGATION AND MINIMISING CONFLICT

4.1 OVERVIEW

4.1.1.1 The Applicant is committed to minimising conflict by adopting a collaborative approach which will enable both industries to operate within the Project Array Area and the OCAS. The Applicant believes that potential impacts on the commercial fisheries stakeholders can be reduced through the design of the Offshore Project and continued open communication with the fishing community. A range of Offshore Project design alterations contribute to mitigation measures for commercial fisheries, as recommended in the MD-LOT 'Marine licensing and consenting offshore renewable energy projects mitigation and monitoring plans guidance', 2025. A successful management, mitigation and communication plan will require open and transparent engagement between the Applicant and its operators and the fishing industry.

4.1.1.2 Embedded or 'designed in' mitigation measures aim to avoid or reduce environmental effects and are directly incorporated into the preferred design for the Offshore Project. This can include standard practice in accordance with or without guidance.

4.1.1.3 Additional mitigation refers to measures introduced in response to the Environmental Impact Assessment (EIA) (**Chapter 21, Volume 2a**) identifying a potentially significant effect (i.e., where the initial assessment predicts a moderate or greater adverse effect). Additional measures are proposed to reduce the predicted residual effect so that it is not significant. Additional mitigation therefore sits beyond the embedded or 'designed in' mitigation and is targeted at managing or reducing impacts where the EIA demonstrates that embedded measures alone are not sufficient.

4.2 MEASURES ADOPTED FOR THE SPIORAD NA MARA PROJECT RELEVANT TO COMMERCIAL FISHERIES

4.2.1.1 **Table 4-1** details the mitigation measures adopted by the Offshore Project relevant to commercial fisheries.

Table 4-1 Mitigation measures adopted for Spiorad na Mara relevant to Commercial Fisheries Stakeholders

Commitment no.	Proposed Commitment	Justification	How the measure will be secured
Embedded Measures			
M026	A Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) (building on **FMMCP, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	To establish effective mitigation measures and with detailed adaptive management strategies to maintain navigation safety, co-operation with fisheries, dissemination of information and ensure engagement between the fishing industry and the Applicant to address fisheries-related impacts across all project phases.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.
M027	Establishment and participation in a Project specific Commercial Fisheries Working Group (CFWG) will be undertaken to facilitate liaison between the Offshore Project and the wider fishing community.	The participation in a CFWG is a convenient way of meeting all fisheries stakeholders on a regular basis and disseminating information. Meeting agendas, minutes and actions will be shared in a timely manner with attendees and the CFWG will have access to all relevant Offshore Project data, such as cable routing information. This promotes collaboration and early resolution of potential conflicts with the fishing community.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.

M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Time delay between sequential cable installation operations (e.g. cable-lay and post-lay protection), shall be minimised to as short as reasonably practicable, to minimise seabed disturbance and cable exposure that could interfere with fishing gear or activities.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	To ensure that the fishing industry is fully informed in advance of any offshore activities. Information will be circulated and distributed by the Offshore Project FIR and CFLO. This includes circulation of the OEMP with the fishing industry before it is finalised. The OEMP will integrate mitigation measures outlined in the FMMCP thus ensuring both plans are consistent and integrate fisheries	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.

		considerations into broader environmental management procedures.	
M028	As outlined in the **FMMCP, Volume 3**, a Company Fisheries Liaison Officer (CFLO), Fishing Industry Representative (FIR), and Offshore Fisheries Liaison Officer(s) (OFLOs) will be appointed prior to commencement of development to liaise with local, regional and national fishing organisations, as well as individual fishers on offshore activities undertaken in relation the Offshore Project.	To maintain effective communications between the commercial fishing industry and the Applicant. The CFLO, FIR and OFLOs will be appointed prior to construction and will have clearly defined roles. An independent FIR will be appointed in consultation with the fishing industry to ensure impartiality. Contact details for the CFLO, FIR and OFLOs will be circulated within the fishing industry. Preparation and dissemination of Offshore Project information via NtM and NtF.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.
M010	Compliance with MGN 654 and its annexes including development and implementation of a Search and Rescue (SAR) Checklist, Emergency Response Cooperation Plan (ERCOP) and guard vessels as required by risk assessment.	To ensure navigational safety of both Offshore Project and fishing vessels and maintain good lines of communication between contractors and fishing vessels during offshore operations, as supported by appropriate offshore fisheries liaison where appropriate.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the ERCOP.
M011	The Offshore Project inclusive of surface piercing structures and subsea cables will be appropriately charted on Admiralty	To ensure navigational safety and minimise risk of gear snagging, 'as-laid' co-ordinates of the cable route shall be	To be secured through a condition of the Section 36 consent and/or Marine Licence.

	and aeronautical charts, and information on structure positions and heights will be provided to the UK Hydrographic Office (UKHO).	recorded and submitted to the UKHO, KIS-ORCA Service and the SFF Horizon Watch Alerts (SFF Services Limited, 2025) and communicated directly to fishing organisations in a timely manner. Sufficient detail will be shared to ensure navigational safety and inform safe fishing operations. 'As-laid' cables shall be marked on Admiralty Charts and fisherman's awareness charts (paper, electronic and plotter format). 'As laid' co-ordinates of the cable route will be updated if future changes are identified, for example during post-construction surveys.	
M012	Timely and efficient distribution of Notices to Mariners (NtMs), Kingfisher notifications, and other navigational warnings of the position and nature of works associated with the Offshore Project, inc information for vessel routes, timings and locations, safety zones (around surface piercing infrastructure) and advisory passing distances. Physical notices will be places at marinas and harbours in the vicinity of the	To ensure that the fishing industry is fully informed in advance of any offshore activities. Information will be circulated via NtMs and the Seafish "Kingfisher" system, and distributed by the FIR and OFLOs.	Secured in the Section 36 Consent and/or Marine Licence via the requirement for notifications and promulgation of information and will be set out within the NSVMP.

	Offshore Project and final locations of installed infrastructure will be charted and distributed to recreational clubs.		
M013	Surface piercing structures - application for safety zones of up to 500 m during construction and periods of major maintenance, and up to 50 m pre-commissioning.	To ensure navigational safety and minimise risk, 500 m safety zones will be implemented around the outer edge of the proposed WTG (and offshore substation platform(s) if required) during construction. A 50 m pre-commissioning safety zone will also be implemented at infrastructure locations where construction is not on-going, prior to wind farm commissioning. During operation, 500 m operational safety zones around the location of any major maintenance activities. The duration of safety zones will be monitored to assess the potential for ongoing impacts to fisheries and introduce adaptive mitigation measures, if required.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M029	A Marine Coordination Centre will be established to monitor all vessel activity (Project, fishing and other maritime vessels), issue Notices to Mariners, and	To maintain effective communications between the fishing industry and the Applicant and ensure that the fishing industry is fully informed in advance of any offshore activities.	To be secured through a condition of the Section 36 consent and/or Marine Licence.

	serve as a contact point for all maritime stakeholders.	Monitoring of fishing vessel activities will ensure information is shared with all relevant parties including fishing vessels not legally required to operate AIS, thus maintaining navigational safety.	
M030	Suitable implementation and monitoring of subsea cable burial, scour protection and cable protection in line with MGN 654 (via burial, or external protection where adequate burial depth as identified via risk assessment is not feasible). Surveys will be coordinated with the fishing industry, and results will be shared to support collaborative engagement and minimise conflict.	Cable burial will be prioritised where ground conditions allow to minimise external cable protection where possible to reduce snagging risks. Time delay between sequential cable installation operations (e.g. cable-lay and post-lay protection), shall be minimised to as short as reasonably practicable, to minimise duration of disruption to commercial fishing activity in the area of the offshore cable(s). In line with M011, cable route information will be shared with the fishing industry in a timely manner to reduce snagging and gear loss by maintaining awareness of cable locations and protection levels.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M014	Marking and lighting of the Array Area in agreement with Northern Lighthouse Board (NLB) and as per the requirements of International Association of Lighthouse	To ensure navigational safety and minimise risk of gear snagging, adequate navigational markers (including lighting), in accordance with the most recent	To be secured through a condition of the Section 36 consent and/or Marine Licence.

	Authorities (IALA) Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	relevant industry guidance will be ensured through preparation of an Aids to Navigation Management Plan and in consultation with fishing organisations.	
M015	Compliance of all Offshore Project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1974) and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	To ensure navigational safety of both Offshore Project and fishing vessels and maintain good lines of communication between contractors and fishing vessels during offshore operations.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice techniques employed through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **MPCP, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).	Provides a plan for clear and rapid reporting within the fishing industry which will, reduce the risk of impacts on target specie and mitigate potential impact on the fishing industry. The MPCP will be shared for review with fishing organisations and if a pollution event occurs at any stage of the Offshore Project, information will be distributed within the fishing industry.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP

M032	A Design Specification Layout Plan (DSLP) will be developed and shared with commercial fisheries stakeholders through the Commercial Fisheries Working Group.	To maintain navigational safety and reduce risk of gear becoming lost or damaged due to snagging the DSLP will include sufficient detail of Offshore Project infrastructure and will be shared with fishing organisations. Any changes to the DSLP will be communicated with fishing organisations in a timely manner to enable updates to the FMMCP.	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a DSLP to be submitted to MD-LOT for approval.
M033	A Lighting and Marking Plan (LMP) will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Maintains visibility and navigational safety, reducing risk to fishing operations and search and rescue operations in accordance with the most recent relevant industry guidance through preparation of an LMP. Lighting and marked areas will be monitored throughout the Offshore Project to maintain navigational safety. The LMP will include sufficient lighting and marking details to ensure maximum visibility for fishing vessels. The LMP will be shared with fishing organisations and specific lighting and marking details will also be distributed on NtMs and NtFs, and Kingfisher bulletin.	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.

M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	To maintain navigational safety and reduce risk of gear becoming lost or damaged due to snagging.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	To ensure navigational safety and minimise risk of gear snagging and to satisfy the requirements of the Energy Act 2004. Early engagement and coordination with the fishing industry will be undertaken to inform the Decommissioning Plan. The plan will also provide information to the fishing industry on restoration of the marine environment and information to ensure safe fishing access post-decommissioning.	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004
M034	Information on post construction geophysical surveys will be shared with Commercial Fisheries Working Group to communicate any changes to relocated seabed materials related to the project construction to reduce snagging risk.	Promote co-operation with fishing activities, reduce the risk of entanglement and mitigate potential loss of damage to fishing gear and safety concerns. In the event of fouling of fishing gear, the primary aim is to avoid danger to the vessel, those on board, and any infrastructure that the fishing gear may have fouled.	Secured in the Section 36 Consent and/or Marine Licence conditions, as detailed within the FMMCP.

M035	Desk-based monitoring of fishing operations surrounding the Offshore Project and periodic assessment of fisheries activity data pre, during and post construction.	To maintain a precise and up to date understanding of fishing activities in zones pertinent to the Offshore Project and revise the FMMCP as appropriate by adaptive management measures. To ensure transparency, monitoring reports will be shared with fishing organisations and the CFWG.	Secured in the Section 36 Consent and/or Marine Licence conditions, as detailed within the FMMCP.
M006	A final Invasive Non-Native Species (INNS) Management Plan will be developed prior to commencement of construction (building on the **INNS Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Promote co-operation with fishing activities, reduce the risk of impacts on target species and prevents ecological changes that could affect fish and benthic habitats.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the INNS Management Plan
M016	Wind turbines blade clearance of at least 28.33 m above Mean High Water Springs (MHWS) (30 m above Mean Sea Level (MSL)).	Promote co-operation with fishing activities, ensures sufficient clearance for fishing vessels and safe transit beneath turbine. DSLP will include final details which will be shared with relevant fisheries organisations for review.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice	Promote co-operation with fishing activities, minimises the risk of impacts on target species habitats and resources.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP

	techniques employed through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **Outline MPCP, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).	MPCP to be shared with relevant fisheries organisation for review.	
M022	A final Navigational Safety and Vessel Management Plan (NSVMP) will be developed prior to commencement of construction (building on the **Outline NSVMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	To ensure navigational safety and minimise risk of gear snagging, adequate navigational markers (including lighting), in accordance with the most recent relevant industry guidance will be ensured through preparation of an Aids to Navigation Management Plan and coordinated with the fishing industry. The plan will consider potential disruption to local fishing operations to ensure a collaborative approach.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an NSVMP to be submitted to MD-LOT for approval.
M024	Dedicated risk assessment post consent if a location within Loch Roag is planned to be used as a base port taking account of vessel traffic in Loch Roag, full details of planned project vessels, their	Promote co-operation with fishing activities by minimising spatial overlap with fishing grounds through engagement with local fishermen and harbour authorities.	To be secured through a condition of the Section 36 consent and/or Marine Licence.

	movements, and bases within Loch Roag, plus any impact on use of existing AtoNs within Loch Roag.		
M036	The Project will only install Wind Turbine Generators and Offshore Substation Platform (if required) above sea infrastructure within the Turbine Area.	Provides economic benefit and minimises conflict with the local fishing fleet. All infrastructure will be charted, and information of Offshore Project infrastructure locations will be disseminated in line with M011.	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M037	Use of local tour operator vessels or fishing vessels that meet relevant safety requirements, where possible to assist future Project activities, such as guard vessel opportunities.	To facilitate safe offshore activities by communicating with other sea users and exchange information on fishing activity and static fishing gear locations to reduce damage to fishing gear and maintain fishing vessel safety.	Secured in the Section 36 Consent and/or Marine Licence conditions, and to be detailed within the FMMCP.
M038	Adherence to best practice guidance with regards to damage or loss of fishing gear that is attributable to the Offshore Project.	Provides clarity on incident reporting and supports fair handling of gear-loss claims. In the event of fouling of fishing gear, the primary aim is to avoid danger to the vessel, those on board, and any infrastructure that the fishing gear may have fouled.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.
Additional Mitigation			
A001	The use of rock bags or rock berms for Offshore Cable protection within the	Promote co-operation with fishing activities, reduce the risk of	Secured in the Section 36 Consent and/or Marine Licence via the

	Array Area will be limited to within 50 m of WTG and Offshore Substation Platform infrastructure.	entanglement and mitigate potential loss or damage to fishing gear and safety concerns.	condition for an FMMCP to be submitted to MD-LOT for approval.
A002	The Offshore Project will endeavour to route the Offshore Cables network to maximise resumption of fishing were possible.	Promote co-operation and minimise conflict with fishing activities, by engaging with fisheries and designing cable routes to maintain, or restore access to fishing grounds during the O&M phase of the Offshore Project.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.
A003	Disruption Agreements will be implemented to coordinate and agree appropriate co-operation and establish evidence-based disruption payments to fishermen, where identified as significant within the EIA.	Provides a fair and transparent mechanism to compensate fishers for demonstrable and evidence-based disruption, supporting socio-economic resilience and minimises conflict.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.

5 MONITORING

5.1.1.1 Mitigation commitment M035 ensures commercial fisheries monitoring will be undertaken to understand changes in fishing activity that may be associated with the presence of the Offshore Project, and to use this evidence to inform mitigation and any updates to this FMMCP (subject to agreement with MD-LOT and fisheries stakeholders).

5.1.1.2 The objectives of monitoring are to:

- Extend the EIAR baseline by collating and reviewing commercial fisheries landings and activity by ICES rectangle (including landings statistics and Vessel Monitoring System (VMS) derived activity);
- Collate and review commercial fisheries landings by port on a monthly basis;
- Review other reasonably available evidence sources to support interpretation of patterns and trends;
- Use available data and stakeholder evidence to better understand variation in commercial fishing activity over time.

5.1.1.3 Monitoring will draw on the following data sources:

- Marine Management Organisation (MMO) monthly landings data by port (including species, tonnage/live weight and first sales value), with analysis focused on key landed species (including lobster, crab and demersal fish species) and review of inter-annual variation;
- VMS activity datasets (MMO annual geographic VMS products for UK vessels);
- Offshore Project records where available (e.g. OFLO/guard vessel logs, Marine Coordination Centre records and any marine traffic survey outputs);
- Ongoing consultation with the fishing industry via the FLO to provide context and identify emerging issues.

5.1.1.4 Data will be collated annually (scheduled around the release of annual landings data by the MMO) examining monthly patterns over the preceding period, with outputs reported by Project phase: post-consent/pre-construction; (continuing the EIAR baseline in **Chapter 21, Volume 2a**); construction (with annual reporting across the construction period). The data set will then be examined to evaluate future monitoring requirements post construction using the principles of adaptive management.

6 REFERENCES

Blyth-Skyrme, R.E. (2010), Options and opportunities for marine fisheries mitigation associated with windfarms. Final report for Collaborative Offshore Wind Research Into the Environment contract FISHMITIG09. COWRIE Ltd, London.

Fishing Liaison Offshore Wind Wet Renewables Group (FLOWW), 2014. Best Practice Guidance for Offshore Renewable Developments: Recommendations for Fisheries Liaison. Available online at: https://maritime-spatial-planning.ec.europa.eu/sites/default/files/floww-best-practice-guidance-for-offshore-renewables-developments-jan-2014_1.pdf [Accessed 19/01/2026].

Fishing Liaison Offshore Wind Wet Renewables Group (FLOWW), 2014. Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds. Available online at: 1720791296-ei-km-in-pc-fishing-012014-floww-best-practice-guidance-for-offshore-renewables-developments-recommendations-for-fisheries-liaison.pdf[Accessed 21/01/2026]

Fishing Liaison Offshore Wind Wet Renewables Group (FLOWW), 2025. Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments. Available online at: https://www.datocms-assets.com/136653/1764233603-floww-best-practice-guidance-nov25-update.pdf [Accessed 19/01/2026].

Marine Management Organisation (MMO). (2022a). UK sea fisheries annual statistics report 2021.

Marine Management Organisation (MMO). (2024a). UK sea fisheries annual statistics report 2022.

Marine Scotland, 2022. Good Practice Guidance for assessing fisheries displacement by other licensed marine activities. Available online at: https://www.gov.scot/publications/good-practice-guidance-assessing-fisheries-displacement-licensed-marine-activities/documents/ [Accessed 19/01/2026].

Marine Scotland, 2020. Guidance on preparing a Fisheries Management and Mitigation Strategy – Draft. Available online at https://www.marine.gov.scot/data/fisheries-management-and-mitigation-strategy-fmms-guidance-document [Accessed 19/01/2026].

Marine Scotland, 2020. Scottish Sea Fisheries Statistics – Landings Data. Available online at - https://data.marine.gov.scot/dataset/2020-scottish-sea-fisheries-statistics-fishing-effort-and-quantity-and-value-landings-ices-1 [Accessed 19/01/2026].

Northland Power, 2023. Spiorad na Mara Scoping Report, Available online at: marine.gov.scot/sites/default/files/snm-npi-pmt-scp-0001_-_spiorad_na_mara_scoping_report.pdf [Accessed 19/01/2026].

Northland Power, 2025. Project website. Available online at: https://northlandpowerscotwind.co.uk/spiorad-na-mara/ [Accessed 19/01/2026] Scottish Government, 2025. Marine licensing and consenting: offshore renewable energy projects. Available online at: https://www.gov.scot/publications/marine-licensing-and-consenting-offshore-renewable-energy-projects/pages/mitigation-and-monitoring-plans/ [Accessed 19/01/2026].

Scotland's National Marine Plan 2015. Available online at: https://www.gov.scot/publications/scotlands-national-marine-plan/ [Accessed 19/01/2026].

SFF Services Limited, 2025. Horizon Watch: Proposal for a Subsea Cable Alert Bulletin.

The Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations, 1996. Available online at - https://assets.publishing.service.gov.uk/media/5a7ca25340f0b65b3de0a2bc/msn1781.pdf [Accessed 19/01/2026].

7 ABBREVIATIONS

7.1.1.1 A list of key terms and acronyms used in this appendix are provided in **Table 7-1.**

Table 7-1 Acronyms and abbreviations

Term	Definition
AC	Alternating Current
AIS	Automatic Identification System
AtoN	Aids to Navigation
CBRA	Cable Burial Risk Assessment
CFLO	Company Fisheries Liaison Officer
CFWG	Commercial Fisheries Working Group
COLREGs	International Regulations for the Prevention of Collisions at Sea
COWRIE	Collaborative Offshore Wind Research into the Environment
DP	Decommissioning Plan
DSLP	Design Specification Layout Plan
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
OEMP	Offshore Environmental Management Plan
ERCOP	Emergency Response Cooperation Plan
ERM	Environmental Resources Management
FIR	Fishing Industry Representative
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FWG	Fisheries Working Group
GDPR	General Data Protection Regulation
GT	Gross Tonnes
HVDC	High Voltage Direct Current
IALA	International Association of Lighthouse Authorities
ICES	International Council for the Exploration of the Seas
IMO	International Maritime Organisation
INNS	Invasive Non-native Species
LMP	Lighting and Marking Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MCC	Marine Coordination Centre
MD-LOT	Marine Directorate Licensing Operation Team
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Protocol

NLB	Northern Lighthouse Board
NSVMP	Navigational Safety and Vessel Management Plan
NtF	Notice to Fishermen
NtM	Notice to Mariners
OCAS	Offshore Cable Area of Search
OEMP	Offshore Environmental Management Plan
OFA	Orkney Fishermen's Association
OFLO	Offshore Fisheries Liaison Officer
OWF	Offshore Wind Farm
RIGA	Regional Inshore Fisheries Group
SAR	Search and Rescue
SFF	Scottish Fishermen's Federation
SOLAS	Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plans
SSEN	Scottish and Southern Electricity Networks
SWPA	Scottish Whitefish Producers Association
UKHO	United Kingdom Hydrographic Office
VHF	Very High Frequency
VMS	Vessel Monitoring System
WIFA	Western Isles Fishermen's Association
WTG	Wind Turbine Generator