

From: [Jenna Lane](#)
To: [MS Marine Renewables](#)
Subject: RE: MeyGen Ltd - Revised Project Environmental Monitoring Programme - Post-consent plan consultation - Response required by 27 July 2023
Date: 25 July 2023 08:47:13
Attachments: [image001.png](#)
[image002.png](#)

Dear Kate,

Thank you for consulting NatureScot on MeyGen's revised Project Environmental Monitoring Programme (PEMP).


We have reviewed the revised PEMP (Version 8, dated 21st March 2023) and we have the following comments.

- We appreciate being provided with a version of the revised PEMP which has tracked changes. This makes it much easier for us to review the changes that have been made.
- Section 3, page 13: The PEMP states that the HiCUP V2 data gathered will be analysed and presented as part of the Marine Mammal Scientific Support programme (MMSS). We have basic queries regarding how this data is being analysed and presented to enable clarity as to whether the PEMP conditions are being met. Also, whilst the MMSS meets regularly, the role of the MeyGen Advisory Group is unclear in approving the findings.
- Section 3, page 13: The PEMP states that Active Acoustic Monitoring (AAM) data collected from the HiCUP V2 could also be evaluated to assess the potential interactions with diving birds and fish, but that there are currently no resources available to conduct these analyses. We query if there is scope for the developer or the wider industry to analyse this data? We would be interested to discuss further what options may be available to analyse this data.
- Figure 4, page 14: The current organisational chart does not reflect how both the MMSS and the HiCUP work (both of which SMRU have been contracted to undertake) interface with all parts of the Marine & Offshore Wind Directorates and the MeyGen Advisory Group.
- Section 6.2, page 20: This section details interim quarterly reporting and the delivery of a draft manuscript to Scottish Government, and it says the quarterly reporting can be shared with the Advisory Group. There needs to be greater clarity regarding how the MMSS programme interacts with the MeyGen Advisory Group, particularly when and to whom report outputs will be presented. The Advisory Group need to be able to learn from the studies through interim reporting to inform future phases of the MeyGen project.
- Section 11, page 32: We advise that the second sentence of paragraph 4 should read "*Should any amendments be necessary these should be discussed with the Advisory Group prior to submission of the revised PEMP to the Scottish Ministers for review*".
- Lastly, we would value Advisory Group meetings being put in the diary at least annually. However, the meetings should be more regular if changes are occurring or planned regarding the deployment of turbines or monitoring equipment. In addition, we see the Advisory Group as having a key role in reviewing data collected and how this should be used in any future assessments.

Our comments above reflect the uncertainty around arrangements between the MMSS work and the conditions associated with MeyGen. It would be helpful if there was continuity of attendees across both the MeyGen advisory group and MMSS update meetings. This would also help address concerns around discharging conditions, reflecting on findings to help support future phases of MeyGen and/or other tidal stream developments in Scottish waters, as well as identifying other research requirements.

Kind regards,

Jenna Lane (she/her) | **Marine Sustainability Adviser** | **Sustainable Coasts & Seas**

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Please note I work from home and I work compressed hours, Monday-Thursday (generally 07:00 – 16:45).
