

**Consultation
Responses – May
2025**

NatureScot

From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Ben Walker](#); [Toni-marie Mcginn](#); [Amy Woodward](#); [MARINEENERGY](#); [Karen Taylor](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP) - Consultation - Response Required by 29 May 2025
Date: 29 May 2025 12:32:44
Attachments: [image001.png](#)

Dear Amy,

Thank you for consulting us on the Project Environmental Monitoring Plan (PEMP) as part of Post Consent Plans for the Culzean Floating Offshore Wind Turbine Pilot Project. We have reviewed the PEMP (document reference: GB-CZT-00-TOTA-000011, Rev. 001), which has been submitted by TotalEnergies to satisfy requirements of marine licence condition 3.2.13.

For context, we highlight our advice (dated 25 April 2024, our ref: CNS / REN / OSWF - INTOG - Total – Culzean) that concluded the Culzean Floating Pilot proposal does not raise significant adverse effects, alone or cumulatively. There is however a role for the PEMP in validating assumptions made in the Environmental Assessment. Given the scale and location of the Culzean Floating Offshore Wind Turbine Pilot Project, we are generally content with what is provided - subject to consideration of our points included below.

The PEMP sets out the following:

- Table 1.2 indicates linkages with the Environmental Management Plan (EMP). It is acknowledged in section 1.5 that the PEMP is a live document which will be updated as the project progresses and should additional linkages with other post-consent plans be established.
- Section 1.6 refers to the ScotMER Programme. We welcome and encourage consideration of collaboration with ScotMER and wish to highlight our recent advice on the Culzean Cable Plan (CaP) regarding a ScotMER project that we understand is under preparation to improve collective understanding of potential electromagnetic field (EMF) impact pathways and help validate underlying assumptions - there may be potential synergies with this project that could be explored. We note that section 1.2 states that “contribution to data collection or monitoring of wider strategic relevance, including in relation to diadromous fish and EMF, as identified and agreed by the Licensing Authority” is “deemed to be out of scope for the project”. It is not clear from the information provided why EMF was deemed to be out of scope.
- Section 3 outlines pre-construction and post-construction monitoring of birds, no monitoring is proposed during construction (which is expected to take approximately 1 month). We note that cameras will be installed on the Culzean Installation (which we understand to refer to the existing oil & gas infrastructure) to cover the turbine location, cameras will be installed in May 2025 (pre-construction) and remain in place for 20 months. It is our assumption that results from this camera system will also be reported, as per the reporting set out in section 3.4. In section 3.4 it is noted that, subject to installation and function of the cameras post-construction, the project intends to provide annual reports on bird utilisation to MD-LOT, NatureScot and RSPB. We welcome this commitment to annual reporting, from the information provided in section 3.3 we assume that camera(s) will be in place for the duration of the operational period - expected to be approximately 10 years. This should be confirmed.

- For marine mammals, as described in section 4, hydrophone(s) will be utilised during pre-construction and construction phases to monitor levels of underwater noise. Although it is stated that “the primary aim of any monitoring is to improve the understanding of the noise profile from floating windfarms” we note that very little information is provided regarding deployment of hydrophones or other equipment during the post-construction phase. We recommend that more detail is provided regarding the hydrophones that are to be deployed. In addition it is not clear how results from the hydrophone deployment will be communicated, this should be further considered.

During construction there is no monitoring proposed for fish or benthic receptors. Pre- and post-construction monitoring relevant to both fish and benthic ecology has been

- linked to the deployment of underwater drones. Details of the proposed underwater drone deployment is included within Appendix 1. As set out in Table 1, four drones (two Slocum gliders and two Sailbuoys) will be deployed in two field campaigns – one during May - June 2025 and the next in May - June 2026. As per Table 1 the drones will gather various different information including eDNA samples, sea floor pictures, hydrographic data, weather data etc. Details of how the data collected by these drones will be reported is not included. We recommend that the planned data analysis scope, with hypothesis led questions is shared for comment and a reporting timeframe should also be included.

In addition the above, we raise the points below for further consideration:

- Throughout the Culzean Floating Pilot Environmental Assessment reference was made to the ‘Culzean Scientific Research and Development Programme’ to be implemented in conjunction with the Technical University of Denmark (DTU) and the Marine Alliance for Science and Technology for Scotland (MASTS) (e.g. section 1.4 of Chapter 1, document number: GB-CZN-00-XODUS-00000 3). As such, it is surprising that the PEMP does not appear to refer to this collaborative R&D Programme. We note that Appendix 1 of the PEMP outlines proposed research and development involving subsea drones, however, it is not clear whether the programme set out in Appendix 1 is the same as that previously outlined (i.e. within the diagram presented in Figure 1-2 of the Environmental Assessment). In our consultation advice (issued 25 April 2024) we noted that the Culzean R&D programme provides a unique opportunity to gain greater insight into aspects of monitoring and indicator development, as well as the potential to test the efficacy of Nature Inclusive Design options. We would appreciate clarification regarding the status of the Culzean R&D programme as presented within the Environmental Assessment and which elements of this are to be progressed.
- From the information provided, it is not clear why contributions to data collection or monitoring of wider strategic relevance in relation to EMF (part f of condition 3.2.13) has been deemed out of scope for the project. We note that in the R&D programme referred to throughout the Culzean Environmental Assessment (i.e. Chapter 8 - Benthic Ecology, Chapter 9 Fish & Shellfish Ecology and Chapter 10 Marine Mammals & Other Megafauna) it is reiterated that EMF recorders will be implemented. As noted above, we would welcome clarification regarding the current scope of the R&D programme. We also highlight the potential synergies between the EMF recorders and ScotMER projects, as per our advice on the Culzean CaP (advice issued 17 April 2025).

- As above, we have previously highlighted the opportunity that the Culzean Floating Pilot and associated R&D programme presents in validating assumptions and contributing to hypothesis led research. In our view this opportunity has not been fully reflected in the current iteration of this PEMP.

I trust this is of assistance.

Kind regards,

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

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Scottish Fishermen's Federation

From: [Mohammad Fahim Hashimi](#)
To: [MD Marine Renewables](#)
Cc: [Elspeth Macdonald](#); [Olivia Biros](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP)
- Consultation - Response Required by 29 May 2025
Date: 29 May 2025 19:18:11
Attachments: [image001.png](#)

Dear Amy,

The Scottish Fishermen's Federation appreciate this opportunity to comment on the above PEMP consultation.

The SFF has no adverse comments to make as long as the proposed measures at the plan is implemented.

Best wishes

Fahim Mohammad Hashimi
Offshore Energy Policy Manager

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Consultation Responses – September 2025

NatureScot

From: [Clare McCarty](#)
To: [Toni-marie McGinn](#); [Amy Woodward](#)
Cc: [Ben Walker](#); [MD Marine Renewables](#); [MARINEENERGY](#); [Karen Taylor](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP) - Consultation - Response Required by 15 October 2025
Date: 21 October 2025 17:06:25
Attachments: [image001.png](#)

Hi Toni-Marie,

Thank you for following up. Apologies for the delay in coming back to you about the suggested meeting.

We have re-considered the clarifications you provided below (email dated 08 October), these clarifications are helpful and upon further reflection we are content to accept the revised PEMP (Rev. 002). Given this, we have no further comments to make at present and no longer require a call to discuss this further.

As mentioned below we have contacted Culzean separately for an update on the R&D programme. We also note an upcoming MASTS workshop linked to the R&D proposals to be held on 20 November, which we hope to attend.

Kind regards,

Clare

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

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From: [MD Marine Renewables](#)
To: ["Clare McCarty"](#)
Cc: [Ben Walker](#); [Toni-marie McGinn](#); [Amy Woodward](#); [MARINEENERGY](#); [Karen Taylor](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP) - Consultation - Response Required by 15 October 2025
Date: 08 October 2025 09:37:00
Attachments: [image001.png](#)

Good morning Clare,

Thank you for providing a response to the consultation on the Project Environment Monitoring Plan (PEMP) for the Culzean Offshore Wind Turbine Pilot Project.

Regarding the comments on the 'Culzean Scientific Research and Development Programme ("R&D")', MD-LOT is content that the programme is not within the scope of the PEMP. This is because, the R&D programme was proposed in the Culzean EIA in addition to the monitoring and mitigation proposed, not as part of it. We also understood NatureScot's comments to the original application, MS-00010724, not to be contingent on the implementation of this programme. If NatureScot wish to input to this programme this should be done outwith the PEMP approval process, and engage with the Developer directly.

Additionally, MD-LOT, as confirmed in our [Scoping Opinion](#) dated July 2023, is content that data collection or monitoring of wider strategic relevance in relation to EMF is deemed to be out of scope for the project.

Please can you confirm if this impacts any of the advice provided? MD-LOT would appreciate a response by **15 October 2025**.

Kind regards,
Amy

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From: [Clare McCarty](#)
To: [MD Marine Renewables](#)
Cc: [Ben Walker](#); [Toni-marie Mcginn](#); [Amy Woodward](#); [MARINEENERGY](#); [Karen Taylor](#)
Subject: RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP) - Consultation - Response Required by 24 September 2025
Date: 24 September 2025 16:13:34
Attachments: [image001.png](#)

Dear Amy,

Thank you for consulting us on the revised Project Environmental Monitoring Plan (PEMP) for the Culzean Floating Offshore Wind Turbine Pilot Project (document reference: GB-CZT-00-TOTA-000011, revision: 02, dated: 02/09/2025).

Revisions made within this version of the PEMP are highlighted within the change log, provided on page 3. While we found the change log to be useful in identifying the location of these revisions, it would be helpful for any future revisions to also be shown via tracked changes to help with our review of these documents.

We have cross-referenced the revised PEMP (rev 02) against the advice we issued in May on revision 001 (NatureScot advice issued 29 May 2025). It was not straightforward to compare the description of changes made within the change log to our advice, partly because the numbered comments (i.e. comment 2 – 5) in the log do not seem to match the order of the bullet points set out in our advice. Our previous advice included 8 bullet points, the detailed change log refers to just 4 NatureScot comments. As such, it is not clear whether each of the points we raised in our previous advice have been fully considered in preparation of rev 02.

Section 1.2 has been updated to include some further narrative on EMF, however, in our view sufficient detail has not been provided to explain the rationale that data collection or monitoring of wider strategic relevance is out of scope. Particularly given the reference to implementation of EMF recorders within the Culzean Environmental Assessment – see relevant comments within our previous advice (i.e. bullet point 2 and bullet point 7).

In addition, whilst we note that further narrative has been included in Section 4.3 regarding hydrophone deployment this remains high-level.

Several points in our previous advice were related to the ‘Culzean Scientific Research and Development Programme’ which was referred to throughout the Culzean Floating Pilot Environmental Assessment. Our points and queries regarding this programme and its relevance to the PEMP have not been further addressed. We would welcome clarification from either MD-LOT or the Developer regarding the status of this programme and whether the associated monitoring is in-scope of the PEMP.

Best wishes,

Clare

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

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Scottish Fishermen's Federation

From: [Oliwia Biros](#)
To: [MD Marine Renewables](#)
Cc: [Ben Walker](#); [Toni-marie Mcginn](#); [Amy Woodward](#); [Mohammad Fahim Hashimi](#)
Subject: Re: TotalEnergies E&P North Sea UK Limited - Post Consent Plans - Project Environmental Monitoring Plan (PEMP) - Consultation - Response Required by 24 September 2025
Date: 24 September 2025 13:42:59
Attachments: [image001.png](#)
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Hi Amy,

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

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

Regards,
Oliwia

Oliwia Biros

Offshore Consents Assessments Manager

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