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 Scottish Government
Riaghaltas na h-Alba

Marine Directorate - Licensing Operations Team Scoping Opinion

**Scoping Opinion adopted by the Scottish Ministers
under Part 4 of The Marine Works (Environmental
Impact Assessment) (Scotland) Regulations 2017**

Statkraft Hydrogen UK Holding Ltd

Tagdale Green Ammonia Project

August 2026

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1. Introduction

1.1 Background

- 1.1.1 On 3 March 2026, the Scottish Ministers received a scoping report (“the Scoping Report”) from Statkraft Hydrogen UK Holding Ltd (“the Applicant”) as part of its request for a scoping opinion relating to Tagdale Green Ammonia Project (“the Proposed Works”). In accordance with regulation 14 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (“the 2017 MW Regulations”) the Scottish Ministers considered the content of the Scoping Report to be sufficient.
- 1.1.2 This scoping opinion is adopted by the Scottish Ministers under the 2017 MW Regulations (“the Scoping Opinion”) in response to the Applicant’s request and should be read in conjunction with the Scoping Report. The matters contained in the Scoping Report have been carefully considered by the Scottish Ministers and use has been made of professional judgment, based on expert advice from stakeholders and Marine Directorate in-house expertise and experience. This Scoping Opinion identifies the scope of impacts to be addressed and the method of assessment to be used in the Environmental Impact Assessment Report (“EIA Report”) for the Proposed Works.
- 1.1.3 The Scottish Ministers, in adopting this Scoping Opinion, have, in accordance with the 2017 MW Regulations, taken into account the information provided by the Applicant, in particular, information in respect of the specific characteristics of the Proposed Works, including its location and technical capacity and its likely impact on the environment. In addition, the Scottish Ministers have taken into account the representations made to them in response to the scoping consultation they have undertaken.
- 1.1.4 In examining the EIA Report, and any other environmental information, the Scottish Ministers will seek to reach an up to date reasoned conclusion on the significant effects on the environment from the Proposed Works. This reasoned conclusion will be considered as up to date if the Scottish Ministers are satisfied that current knowledge and methods of assessment have been taken account of. It is for the Applicant to consider whether it would be beneficial for a new scoping opinion to be sought based on updated knowledge or changes to methods of assessment. For the avoidance of doubt, this Scoping Opinion does not preclude the Scottish Ministers from requiring the Applicant to submit additional information in connection with any EIA Report submitted with an application for a marine licence under the Marine (Scotland) Act 2010 (“the 2010 Act”).

2. The Proposed Works

2.1 Introduction

- 2.1.1 This section provides a summary of the description of the Proposed Works provided by the Applicant in the Scoping Report together with the Scottish Ministers' general comments in response. The details of the Proposed Works in the Scoping Report have not been verified by the Scottish Ministers and are assumed to be accurate.

2.2 Description of the Proposed Works

- 2.2.1 The purpose of the Proposed Works is to create facilities to convert electrolytic green hydrogen, produced from renewable energy, to green ammonia for use in the existing ammonia market. The Proposed Works are located in Dales Voe, approximately 3.5 kilometres ("km") to the north of Lerwick, Shetland and will involve construction works below Mean High Water Springs ("MHWS").
- 2.2.2 The Proposed Works consist of construction a new 160 metre ("m") jetty, orientated broadly perpendicular to the coastline with dolphin moorings at the seaward end. The jetty will support ammonia export vessels, will be capable of accommodating vessels over 1,350 tonnes and will be located near the north-east boundary of the site on the coastal side. The ammonia will be transported via an above ground pipeline to the offloading site, located below MHWS adjacent to the main production site. The Proposed Works include the installation of a pipe which will run along the length of the jetty to a loading arm. The pipe will connect to the transport vessel during transfer of the ammonia.
- 2.2.3 The jetty width will be up to 8m and the jetty height has been estimated as 18.3m from the seabed at the deepest point. Due to the water depth at the location of the jetty, no dredging is proposed. The overall footprint and working area are not yet known.
- 2.2.4 Dolphin moorings will be used to secure vessels at the jetty and the jetty shall be fitted with navigational signage and lighting which adheres to local and national regulations. It has been assumed that steel piles would be suitable and would typically be installed by a crane on a floating pontoon/barge, although the piling methodology and number of piles required are not yet known.
- 2.2.5 During construction, it is proposed to utilise the existing Dales Voe Base for delivery of construction materials. The construction works will commence in late 2027 and last for approximately two years, with the first ammonia export from the jetty taking place in early 2030.

2.3 Onshore Planning

- 2.3.1 The Scottish Ministers are aware the Applicant has sought a separate scoping opinion from Shetland Islands Council for the associated onshore works. It is essential that the EIA Report concerning onshore works will be available at the time that the EIA Report for the Proposed Works is being considered so that all the information relating to the project as a 'whole' is presented. The EIA Report for the Proposed Works must consider the cumulative impacts with the onshore works. The Scottish Ministers advise that the EIA Report must explicitly detail the licensable marine activities to be carried out below MHWS as part of the Proposed Works and identify which activities overlap with Shetland Islands Council's remit.
- 2.3.2 The Applicant intends to cover the following topics within the terrestrial scoping report and EIA Report, and as such they are not considered further in the Scoping Report submitted to Scottish Ministers. The overarching topics that will be addressed in the terrestrial EIA Report are listed below:
- Seascape, Landscape and Visual Impact Assessment ("SLVIA")
 - Major Accidents and Disasters
 - Socio-economics
 - Air Quality
 - Population and human health
 - Disposal and Transport of Waste

2.4 The Scottish Ministers' Comments

Description of the Proposed Works

- 2.4.1 The Applicant has considered the construction, operation and maintenance phases of the project as the site is intended to operate indefinitely. Consideration of the long-term impacts of vessel operations associated with the project have been included as part of the assessment. The Scottish Ministers note that the studies undertaken thus far have not included consideration of geotechnical or structural design of the connection of the jetty to the seabed and the Proposed Works do not include dredging activities as this is not considered necessary however the overall marine project area is not yet known.
- 2.4.2 The Scottish Ministers note that construction activities are expected to include the installation of steel piles however it is not known whether rotary or impact piling techniques will be used. Seabed preparations including boulder removal

may also be required. The infrastructure is intended to stay in place indefinitely, due to this there is no assessment of decommissioning.

- 2.4.3 The Applicant's approach has impacted on the level of detail contained in the Scoping Report with respect of the Proposed Works and methodology. Overall, the lack of detail presented has impacted on Scottish Ministers ability to provide specific scoping advice in respect of some elements of the Proposed Works. The EIA Report and associated applications will require specific information in order to provide a full understanding of the scale, methodology and future usage of the Proposed Works.

Design Envelope

- 2.4.4 The Scottish Ministers note the Applicant's intention to apply a 'Design Envelope' approach. Where the details of the Proposed Works cannot be defined precisely, the Applicant will apply a worst case scenario, as set out in Section 2.1.1 of the Scoping Report.
- 2.4.5 The Scottish Ministers advise that the Applicant must make every attempt to narrow the range of options. Where flexibility in the design envelope is required, this must be defined within the EIA Report and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Works should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Works must be clearly and consistently defined in the application/s for the marine licence/s and the accompanying EIA Report.
- 2.4.6 The Scottish Ministers may determine the application/s based on the worst case scenario. The EIA will reduce the degree of design flexibility required and the detail may be further refined in subsequent plans (e.g. a Construction Method Statement) to be submitted to the Scottish Ministers, for their approval, before works commence. Please note however, the information provided in Section 7 below regarding multi-stage regulatory approval. The subsequent plans will 'freeze' the design of the project and will be reviewed by the Scottish Ministers to ensure that the worst case scenario described in the EIA Report is not exceeded.
- 2.4.7 It is a matter for the Applicant, in preparing the EIA Report, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. If the Proposed Works or any associated

activities materially change prior to the submission of the EIA Report, the Applicant may wish to consider requesting a new Scoping Opinion.

Alternatives

- 2.4.8 The EIA Regulations require that the EIA Report include 'a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the Applicant, which are relevant to the Proposed Works and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'. The Scottish Ministers note that the Applicant's Scoping Report did not indicate any consideration of alternatives.
- 2.4.9 For the avoidance of doubt, the Scottish Ministers advise that the EIA Report must include an up to date consideration of the reasonable alternatives studied as the parameters of the Proposed Works have been refined. The Scottish Ministers expect this to comprise a discrete section in the EIA Report that provides details of the reasonable alternatives studied across all aspects of the Proposed Works and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

3. Contents of the EIA Report

3.1 Introduction

- 3.1.1 This section provides the Scottish Ministers' general comments on the approach and content of information to be provided in the Applicant's EIA Report, separate to the comments on the specific receptor topics discussed in section 5 of this Scoping Opinion.

3.2 EIA Scope

- 3.2.1 Matters are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Scottish Ministers. The matters scoped out should be documented and an appropriate justification noted in the EIA report.

3.3 Mitigation and Monitoring

- 3.3.1 The Scottish Ministers note Table 17-1 Outline Schedule of Mitigation of the Scoping Report details proposed mitigation measures relative to each receptor chapter of the Scoping Report. The Applicant commits to providing details of the outlined mitigation into the EIA Report Summary of Impacts and Mitigations. For the avoidance of doubt, any embedded mitigation relied upon for the purposes of the assessment should be clearly and accurately explained in detail within the EIA Report. The likely efficacy of the mitigation proposed should be explained with reference to residual effects.
- 3.3.2 The EIA Report should clearly demonstrate how the Applicant has had regard to the mitigation hierarchy, including giving consideration to the avoidance of key receptors and sensitivities such as seasonality. It should be clear how these adverse effects will be mitigated, for example if the adverse effects will be avoided and certain activities will not be carried out during sensitive times. If the sensitive times will not be avoided, a description of the mitigation measures that will be put in place to prevent, reduce or offset any adverse effects should be provided.
- 3.3.3 The Scottish Ministers advise that where the mitigation is envisaged to form part of a mitigation or monitoring plan, the EIA Report must set out these plans or the reliance on these in sufficient detail to allow the significance of the residual effect to be assessed and evaluated. This should also include identification of any monitoring of the effectiveness of mitigation and remedial actions (where relevant) in the event that observed effects differ from predicted residual effects differ. Commitment to develop plans without sufficient detail is not considered to be suitable mitigation in itself.

- 3.3.4 The EIA Report must include a table of mitigation which corresponds with the mitigation identified and discussed within the various chapters of the EIA Report and accounts for the representations and advice attached in Appendix I.
- 3.3.5 Where potential impact on the environment has been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by detailing in the EIA Report, the work that has been undertaken, the results, what impact, if any, has been identified and why it is not significant.
- 3.3.6 The EIA Report should identify and describe any proposed monitoring and how the results of such monitoring would be utilised to inform any appropriate remedial actions. This should include a description of the monitoring proposed, the purpose of the monitoring, a list of receptors that will be monitored, the type of parameters that will be monitored and the duration of monitoring.

4. Consultation

4.1 The Consultation Process

4.1.1 Following receipt of the Scoping Report, the Scottish Ministers, in accordance with the 2017 MW Regulations, initiated a 30 day consultation process, which commenced on 24 March 2026. The following bodies were consulted, those marked in bold provided a response and those marked in italics sent nil returns or stated they had no comments:

- Crown Estate Scotland
- **Defence Infrastructure Organisation (“DIO”)**
- Fisheries Management Scotland
- Health and Safety Executive
- **Historic Environment Scotland (“HES”)**
- Lerwick Community Council
- Lerwick Fishery Office
- **Lerwick Port Authority (“LPA”)**
- Marine Safety Forum
- **Maritime and Coastguard Agency (“MCA”)**
- National Trust for Scotland
- **NatureScot (operating name of Scottish Natural Heritage)**
- **Northern Lighthouse Board (“NLB”)**
- Northlink Ferries
- Royal Society for the Protection of Birds Scotland
- Royal Yachting Association
- **Scottish Environment Protection Agency (“SEPA”)**
- **Scottish Fishermen's Federation (“SFF”)**
- Scottish Fishermen's Organisation
- Scottish White Fish Producers Association
- Scottish Wildlife Trust
- **Shetland Islands Council (“SIC”)**
- Shetland Marine Planning Partnership
- Shetland Shellfish Management Organisation
- **Tingwall, Whiteness & Weisdale Community Council (“TWWCC”)**
- *UK Chamber of Shipping*
- Visit Scotland
- Whale & Dolphin Conservation

While the **Shetland Fisherman's Association** was not part of the original consultation list, it provided a response on 8 April 2026.

- 4.1.2 Specific advice was sought from the Marine Directorate – Marine Analytical Unit (“MAU”) and Transport Scotland (“TS”).

4.2 Responses received

- 4.2.1 From the list above a total of 11 responses were received. Advice was also provided by MAU and TS. The purpose of the consultation was to seek representations to aid the Scottish Ministers’ consideration of which potential effects should be scoped in or out of the EIA Report.
- 4.2.2 The Scottish Ministers are satisfied that the requirements for consultation have been met in accordance with the 2017 MW Regulations. The sections below highlight issues which are of particular importance with regards to the EIA Report and any marine licence applications. The representations and advice received are attached in Appendix I and each must be read in full for detailed requirements from individual consultees.

5. Interests to be considered within the EIA Report

5.1 Introduction

- 5.1.1 This section contains the Scottish Ministers' opinion on whether the impacts identified in the Scoping Report are scoped in or out of the EIA Report. The Scottish Ministers advise that the representations from consultees and advice from MAU and TS must be considered in conjunction with the Scoping Opinion and with the expectation that recommendations and advice as directed through this Scoping Opinion are implemented.

5.2 Marine Physical and Coastal Processes

- 5.2.1 The Applicant considers the potential impacts on marine physical and coastal processes in Section 6 of the Scoping Report. The Applicant proposes to scope out impacts on designated features within designated sites during all phases due to the Proposed Works being localised and more than 10 km from any relevant features of designated sites. The Applicant considers there to be a potential impact on coastal processes including hydrodynamic, wave and sediment regimes and nearshore seabed morphology, sediment suspension, scour introduction and stratification from the Proposed Works. Table 6-2 outlines the potential environmental effects to be scoped in/out of further assessment in the EIA Report. The Scoping Report rationalises that those elements to be scoped out are effectively mitigated due to the localised small scale of the Proposed Works.
- 5.2.2 In its representation SIC noted that the 5 km study area defined for ecological receptors appears insufficient to capture wider marine and coastal effects and the basis for this spatial scope is unclear. SIC advised that the Applicant should define and justify appropriate zones of influence for each impact pathway.
- 5.2.3 The Scottish Ministers agree with the proposed scope for the assessment of marine physical and coastal processes as detailed in Table 6-2. The Scottish Ministers agree that marine physical and coastal processes are scoped in for further assessment within the EIA Report. The Applicant is directed to the SIC representation in Appendix I and advised to engage with SIC to ensure that robust definitions and justification of appropriate zones of influence for each impact pathway are included in the EIA Report.

5.3 Water and Sediment Quality

- 5.3.1 The Applicant considers the potential impacts of the Proposed Works on water quality in Section 7 of the Scoping Report. The Applicant considers the potential effects on water quality status changes due to accidental discharges, the potential for release of contaminants and introduction of invasive non-

native species (“INNS”) through vessel movements from the Proposed Works. The Applicant considers the temporary and localised nature of the Proposed Works, implementation of mitigation and good practice measures along with the low likelihood of occurrence and concludes that water and sediment quality should be scoped out for further assessment.

- 5.3.2 The Scottish Ministers agree with the Applicant’s proposal to produce a Construction Environmental Management Plan (“CEMP”), covering pollution prevention, biosecurity assessment and waste management plan. The Applicant is directed to the SIC representation in Appendix I and advise that the Proposed Works are developed in accordance with the Biosecurity Plan for the Shetland Islands
- 5.3.3 The Scottish Ministers agree with the approach to the assessment of water and sediment quality and agree it can be scoped out from further assessment within the EIA.

5.4 Benthic Ecology

- 5.4.1 The Applicant considers the potential impacts of the Proposed Works on benthic ecology in Section 8 of the Scoping Report. The Applicant considered potential impacts on loss and disturbance of habitat and species, increased suspended sediment concentration (“SSC”), introduction and spread of INNS, pollution and accidental discharge or leakage, contaminated sediments, hydrodynamic changes and colonisation from the Proposed Works. Table 8-2 outlines the potential environmental effects to be scoped in/out of further assessment in the EIA Report.
- 5.4.2 In its representation SIC advised assessments should include benthic habitats potentially affected by subsea infrastructure.
- 5.4.3 The Scottish Ministers broadly agree with the approach for the assessment of benthic ecology as proposed in Table 8-2. The Applicant must engage with SIC to ensure the impacts of subsea infrastructure on benthic habitats is fully assessed within the EIA Report.

5.5 Fish and Shellfish Ecology

- 5.5.1 The Applicant considers the potential impacts of the Proposed Works on fish and shellfish ecology in Section 9 of the Scoping Report. The Applicant considered the disturbance or damage due to underwater sound generated from piling activities and vessels, temporary habitat loss or disturbance due to seabed preparation activities and temporary increases in SSCs and sedimentation/smothering, disturbance or damage due to underwater sound generated by vessels and long-term habitat loss due to the presence of jetty and moorings on the seabed from the Proposed Works. Table 9-3 outlines the

potential environmental effects to be scoped in/out of further assessment in the EIA Report. The elements considered to be of low extent and likelihood of occurrence, after implementation of mitigation and good practice measures, are proposed to be scoped out through consideration of the small, localised scale of the Proposed Works.

- 5.5.2 In its representation SIC noted that annual inshore fish surveys, including spawning and nursery areas, have not been included and advised they should be used to inform the EIA Report. It also advised flapper skate distribution and abundance should be considered by consulting the University of the Highlands and Islands Shetland ("UHI Shetland") along with the Shetland Shellfish Management Organisation ("SSMO") to obtain data on shellfish distribution and abundance. SIC advised that impacts on sea trout, as a Priority Marine Feature should be included in the EIA Report.
- 5.5.3 The Scottish Ministers broadly agree with the approach for the assessment of fish and shellfish ecology as detailed in Table 9-3. The Scottish Ministers concur that fish and shellfish ecology be scoped in to the extent outlined in the Scoping Report and advise that assessment of impacts on sea trout must be included within the EIA Report. The Applicant is directed to the SIC representation in Appendix I and advised that the referenced reports, research data and information available from UHI Shetland and the SSMO must be used to inform the fish and shellfish ecology assessments within the EIA Report.

5.6 Marine Mammals and Other Megafauna

- 5.6.1 The Applicant considers the potential impacts of the Proposed Works on marine mammals and other megafauna in Section 10 of Scoping Report. The Applicant considered noise from construction activities and indirect impacts from changes to prey availability, effects on water quality, vessel disturbance and risk or injury from collision with vessels, risk of injury from collision with jetty, displacement or barrier effects, release of contaminants from vessels and long term habitat change from the Proposed Works. At Table 10-3 the Applicant outlines the potential environmental effects to be scoped in/out of further assessment in the EIA Report noting that impacts to protected species from underwater noise due to piling is to be scoped in at the construction stage only and all other elements are proposed to be scoped out. Contradictory information is provided at paragraph 10.10 of the Scoping Report, where the Applicant proposes to scope in noise-related impacts during all phases of the Proposed Works with the inclusion of assessment of the risks of injury and disturbance/displacement to marine mammals during the construction phase only. The Applicant proposes to scope out impacts to otters for further assessment due to them residing above MHWS and there being no accepted otter holts within the vicinity of the Proposed Works.

- 5.6.2 In its representation SIC disagrees with the proposed approach to the assessment of the potential impacts on marine mammals and other megafauna and identifies that the entirety of Shetland is designated as an Important Marine Mammal Area (“IMMA”). SIC advised that disturbance from construction activities, vessel traffic, underwater noise, and subsea works should be fully assessed within the EIA Report for potential impacts on marine mammals. SIC advised that otters are likely to be present in the area and they are reliant on the marine environment for food resource. It proposed that otters should be scoped in for further assessment within the EIA Report unless NatureScot was to advise otherwise.
- 5.6.3 The Scottish Ministers agree with the Applicant’s proposal to produce a Construction Environmental Management Plan (“CEMP”), adhere to the Scottish Marine Wildlife Code, develop a piling strategy and implement a Marine Mammal Mitigation Protocol. The Scottish Ministers broadly agree with the approach for the assessment of marine mammals and other megafauna as detailed in the Scoping Report however note the discrepancy and emphasise that Shetland is an IMMA. The Scottish Ministers advise that potential disturbance impacts on marine mammals from construction noise and subsea works, and vessel movement are scoped in for the construction phase for further assessment in the EIA Report and agrees with the Applicant this must include risk of injury assessment. The Scottish Ministers advise that disturbance from vessel movement, underwater noise and subsea works are scoped in for the operational and maintenance phases. This is supported by SIC in its representation. To the extent that the effects relate to the marine licensable activities, the Scottish Ministers are of the opinion that otters can be scoped out for further assessment for marine mammals and other megafauna provided that impacts on otters are assessed in accordance with the scoping report submitted to SIC, for the terrestrial works associated with the overall project, and is included under the cumulative effects assessment.

5.7 Ornithology

- 5.7.1 The Applicant considers the potential impacts of the Proposed Works on ornithology in Section 11 of Scoping Report. The Applicant considered the potential impact of vessel presence, noise, change to prey availability, increase in SSC’s and turbidity and accidental release of pollutants from the Proposed Works. In Table 11-3 the Applicant outlines the potential environmental effects to be scoped in/out of further assessment in the EIA Report and considers the elements to be scoped out on the basis of potential impacts being assessed as negligible after the implementation of mitigation outlined in Table 17-1 of the Scoping Report alongside the small, localised scale of the Proposed Works.

- 5.7.2 In its representation, NatureScot advised that seabirds could be disturbed and/or displaced from vessel presence and it was unclear why the construction phase was scoped out of further assessment within the EIA Report. NatureScot advised that disturbance of seabirds and/or their displacement from foraging habitats due to vessel presence should be scoped in for further assessment in the EIA Report for the construction, operational and maintenance phases and the assessment should include impacts of disturbance and displacement to birds from vessels transiting to the site during all stages of the Proposed Works.
- 5.7.3 In its representation, TWWCC advised that consideration should be given to the potential for impacts on the arctic tern nesting site located on Muckle Ayre, Shetland which is in close proximity to the Proposed Works.
- 5.7.4 The Scottish Ministers broadly agree with the impacts on ornithology that are proposed to be scoped in for assessment as detailed in Table 11-3 and agree with the Applicant's proposal to develop and implement a Vessel Management Plan ("VMP"). The Scottish Ministers agree with the representation from NatureScot and advise that the disturbance and displacement impacts from vessel movements and vessels transiting to the area must be scoped in for further assessment during all phases, this is supported by the representation from TWWCC, and directs the Applicant to the NatureScot representation in Appendix I.

5.8 Other Sea Users

- 5.8.1 The Applicant considers the potential impacts of the Proposed Works on other sea users in Section 12 of Scoping Report. The Applicant considered displacement and interference with fishing activity, obstruction of aquaculture, recreational and tourism activities, interference with fishing activity, displacement from fishing grounds and obstruction of aquaculture activities from the Proposed Works. At Table 12-4 the Applicant outlines the potential environmental effects proposed to be scoped in/out of further assessment in the EIA Report. The Scoping Report rationalises that those elements to be scoped out are due to the small, localised scale of the Proposed Works.
- 5.8.2 In its representation SFF noted the Scoping Report acknowledges fishing activity within and around Dales Voe and describes this activity as low intensity and therefore proposes to scope out several fisheries-related impact pathways. SFF advised that some fishing activity, including static gear and inshore dredging, occurs in the wider area and emphasised that the lack of detailed, high-resolution inshore fisheries data should not be interpreted as an absence of fishing activity, particularly given the small-scale, seasonal and often under-represented nature of inshore static gear fisheries. SFF advised in its representation that, due the permanent nature of the proposed

infrastructure, fisheries and other commercial sea users should remain identified as receptors within the environmental assessment, even if impacts are ultimately assessed as not significant.

- 5.8.3 The Scottish Ministers advise that the potential impacts on other sea users is scoped in for all phases for further assessment within the EIA Report. The Scottish Ministers direct the Applicant to the SFF representation in Appendix I and advise that it is fully addressed within the EIA Report.

5.9 Shipping and Navigation

- 5.9.1 The Applicant considers the potential impacts of the Proposed Works on shipping and navigation in Section 13 of the Scoping Report. The Applicant considered potential effects from vessel disruption and vessel to vessel collision impacts from the Proposed Works and concludes all should be scoped in for the construction, operational and maintenance phases.
- 5.9.2 The Scottish Ministers agree that shipping and navigation be scoped in for further assessment within the EIA Report for all phases and direct the Applicant to the MCA representation in Appendix I and advise that the recommendations are fully addressed.

5.10 Cultural Heritage and Marine Archaeology

- 5.10.1 The Applicant considers the potential impacts of the Proposed Works on cultural heritage and marine archaeology in Section 14 of Scoping Report. The Applicant considers the effects on known and unknown cultural heritage and marine archaeology from indirect disturbance caused by SSC, deposition and loss or damage from direct impacts from the Proposed Works. The Applicant proposes that all impacts are to be scoped out due to potential impacts being assessed as negligible after the implementation of mitigation outlined in Table 17-1 of the Scoping Report.
- 5.10.2 Historic Environment Scotland in its representation confirmed that significant adverse impacts on heritage assets within its remit are unlikely and therefore it was content for cultural heritage to be scoped out of the EIA Report. In its representation SIC advised that consultation with the Shetland Regional Archaeologist should be carried out to confirm that potential impacts on marine archaeology can be scoped out of the marine EIA Report.
- 5.10.3 No representations have been received by Scottish Ministers that indicate cultural heritage and marine archaeology should be scoped in for further assessment in the EIA Report. However, Scottish Ministers note SIC's comment regarding marine archaeology and advise the Applicant to engage with the Shetland Regional Archaeologist on this matter.

5.11 Climate Change and Carbon

- 5.11.1 The Applicant considers the potential impacts of the Proposed Works on climate change and carbon in Section 15 of Scoping Report. The Applicant considered the effects of Greenhouse Gas (“GHG”) emissions from vessels, project infrastructure with vulnerability to climate change and in-combination climate change impacts (“ICCI”) from the Proposed Works. Table 15-2 outlines the potential environmental effects proposed to be scoped in/out of further assessment in the EIA Report. The Applicant proposes to scope out GHG emissions from vessels during operation and maintenance phases due to limited use and that the Proposed Works will contribute to an overall reduction.
- 5.11.2 The Scottish Ministers are however mindful that Greenhouse Gas (“GHG”) emissions from all projects contribute to climate change. In this regard, the Scottish Ministers note the Applicant’s proposal for the Carbon Impact Assessment to take into account the IEMA Environmental Impact Assessment Guide “Assessing Greenhouse Gas Emissions And Evaluating Their Significance” (“IEMA GHG Guidance”), which states that “GHG emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any GHG emissions or reductions from a project might be considered to be significant.” The Scottish Ministers have considered this together with the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the requirement of the EIA Regulations to assess significant effects from the Proposed Works on climate. The Scottish Ministers therefore advise that the EIA Report must include a GHG Assessment which should be based on a Life Cycle Assessment (“LCA”) approach and note that the IEMA GHG Guidance provides further insight on this matter. The Scottish Ministers highlight however that this should include the pre-construction, construction, operation and decommissioning phases, including consideration of the supply chain as well as benefits beyond the life cycle of the Proposed Works.
- 5.11.3 The Scottish Ministers advise that climate change and carbon be scoped in for further assessment within the EIA Report for all stages following the information/guidelines outlined above.

5.12 Cumulative Effects

- 5.12.1 The Applicant has set out its proposed approach to cumulative effects in section 2.5 of the Scoping Report and that this will form part of the EIA process.
- 5.12.2 In its representation SIC stated that assessment should include cumulative effects with other marine and terrestrial developments, including Mossy Hill Wind Farm and associated infrastructure.

- 5.12.3 The Scottish Ministers agree that cumulative effects should be scoped in for all phases of the Proposed Works and direct the Applicant to the representation from SIC at Appendix I and advise that cumulative effects must be scoped in for further assessment within the EIA Report for all phases.

5.13 Decommissioning

- 5.13.1 The Scottish Ministers note that decommissioning is referred to in Section 5.4 of the Scoping Report and the Applicant does not consider that decommissioning should be within the scope of the EIA Report on the basis that the marine infrastructure is intended to remain in place indefinitely.
- 5.13.2 In its representation LPA advised that Works Licences, issued by LPA for marine works below MHWS and within the defined limits of Lerwick Harbour, include clauses and obligations relating to the removal of the marine works and therefore decommissioning should be considered in the EIA Report.
- 5.13.3 The Scottish Ministers agree that decommissioning should be scoped in for further assessment within the EIA Report and direct the Applicant to the LPA representation in Appendix I and advise that the recommendations are fully addressed.

5.14 Seascape, Landscape and Visual Impacts

- 5.14.1 The Applicant has not proposed a SLVIA as a receptor chapter within the EIA Report and indicates in Section 2.2 of the Scoping Report that a SLVIA is one of the noted EIA topics which will be covered by the terrestrial EIA Report when submitted to SIC. At Section 2.2 of the Scoping Report the Applicant states that the majority of the potential seascape, landscape and visual impacts will be a result of the terrestrial aspects of the Proposed Works and proposes that the marine impacts are anticipated to be minimal and do not require further assessment within the EIA Report for the marine aspects of the Proposed Works.
- 5.14.2 In its representation, SIC disagreed with the statement in section 3.2.1 of the Scoping Report that SIC has agreed the scope of the SLVIA and advised that its comment which were previously provided during the terrestrial scoping process did not explicitly address seascape impacts and were based solely on the terrestrial footprint of the proposed development. SIC advise that the SLVIA should consider the full extent of the development, including both marine and terrestrial components before SIC can definitively comment on the full scope of the SLVIA, including the Zones of Theoretical Visibility and viewpoint selection. In its representation, SIC advise that seascape impacts should consider water-based viewpoints to capture visual and perceptual effects for ferry routes, recreational boating, marine tourism, commercial

shipping and industrial marine traffic. Clarification on lighting, including navigational lighting should be provided by the Applicant to determine if a night-time SLVIA is required.

- 5.14.3 The Scottish Ministers concur with the Applicant's proposal to scope out seascape, landscape and visual impacts provided the full extent of the project, including both marine and terrestrial components is assessed within the SLVIA included within the terrestrial EIA Report. This is supported by SIC in its representation. The Scottish Ministers direct the Applicant to the SIC representation in Appendix I and advise that the recommendations are fully addressed.

5.15 Socio-Economics

- 5.15.1 The Applicant has not considered socio-economics within the Scoping Report. The Scottish ministers note that socio-economics is referred to in Section 2.2 of the Scoping Report, EIA Topics Covered by the Terrestrial EIA and the Applicant's proposal that the majority of the potential impacts will be a result of the terrestrial aspects of the Proposed Works, any marine impacts are anticipated to be minimal and do not require further assessment within the EIA Report for the marine aspects of the Proposed Works.
- 5.15.2 In its advice MAU noted that where the Applicant believes there are no marine socio-economic impacts related to the marine works, or that potential impacts are anticipated to be minimal, then clear justification should be provided. The MAU advise that a full socio-economic impact assessment is included in both the terrestrial and the marine EIA Reports and provides general guidance to the Applicant on aspects which could be included to assess the socio-economic impacts of the Proposed Works.
- 5.15.3 In its representation, TWWCC advised that assessment of potential impacts to honey businesses in Shetland, as a result of the Proposed Works, should be assessed due to the close proximity of bee colonies to the proposed site.
- 5.15.4 The Scottish Ministers advise that socio-economics be scoped in for further assessment within the EIA Report. This is supported by advice from MAU and in the representation from TWWCC. The Scottish Ministers direct the Applicant to the MAU advice and TWWCC representation in Appendix I and advise that these are fully addressed within the EIA Report.

5.16 Major Accidents and Disasters

- 5.16.1 The Applicant has not considered major accidents and disasters within the Scoping Report and refers, in Section 2.2 EIA Topics Covered by the Terrestrial EIA, to this being due to the majority of the potential impacts resulting from the terrestrial aspects of the Proposed Works, any marine impacts are anticipated

to be minimal and do not require further assessment within the EIA Report for the marine aspects of the Proposed Works.

- 5.16.2 In its representation LPA advised that consideration should be given to the potential for accidental ammonia releases during transfer, loading and transportation operations, and an assessment of effects should include potential impacts on air quality and the marine environment as a result of ammonia escape incidents. LPA advised that consideration should be given to the proximity of the proposed jetty and associated infrastructure to LPA's existing operational marine facilities at Dales Voe, including established safeguarding zones associated with the licensed explosives berth. The Dales Voe Base and the site of the Proposed Works are not directly connected, and any implications arising from this should be assessed.
- 5.16.3 The Scottish Ministers agree that a separate major accidents and disasters assessment is not required within the EIA Report provided the full extent of the project, including both marine and terrestrial components is assessed within the terrestrial EIA Report. The Scottish Ministers direct the Applicant to the LPA representation in Appendix I and advise that it is fully addressed within the terrestrial EIA Report which will be submitted to SIC.

5.17 Geology

- 5.17.1 The Applicant has not considered geology as part of the Scoping Report and it is therefore assumed that the Applicant does not consider that geology should be within the scope of the EIA Report. However, the Scottish Ministers are of the opinion that geology should be scoped in for the construction phase of the Proposed Works even if impacts are ultimately assessed as not significant.
- 5.17.2 In its representation TWWCC advised that assessment of rare minerals which may be present in the area of the Proposed Works should be undertaken.
- 5.17.3 The Scottish Ministers advise that geology be scoped in for further assessment within the EIA Report. This is supported by the representation from TWWCC. The Scottish Ministers direct the Applicant to the TWWCC representation in Appendix I and advise that this is addressed within the EIA Report.

6. Application and EIA Report

6.1 General

- 6.1.1 The EIA Report must be in accordance with the 2017 MW Regulations and the Scottish Ministers draw your attention in particular to, regulation 6. In accordance with the 2017 MW EIA Regulations, the Scottish Ministers advise that the EIA Report must be based on this Scoping Opinion.
- 6.1.2 The Scottish Ministers note the need to carry out an assessment under the The Conservation (Natural Habitats, &c.) Regulations 1994. This assessment must be coordinated with the EIA in accordance with the 2017 MW Regulations.
- 6.1.3 A gap analysis template is attached at Appendix II to record the environmental concerns identified during the scoping process. This template should be completed and used to inform the preparation of the EIA Report. As part of the submission of the EIA Report the Scottish Ministers advise that the Applicant must provide confirmation of how this Scoping Opinion is reflected in the EIA Report.

7. Multi-Stage Regulatory Approval

7.1 Background

- 7.1.1 The 2017 MW Regulations contain provisions regulating the assessment of environmental impacts. A multi-stage approval process arises where an approval procedure comprises more than one stage; one stage involving a principal decision and one or more other stages involving implementing decision(s) within the parameters set by the principal decision. While the effects which works may have on the environment must be identified and assessed at the time of the procedure relating to the principal decision, if those effects are not identified or identifiable at the time of the principal decision, assessment must be undertaken at the subsequent stage.
- 7.1.2 The definition in the 2017 MW Regulations is as follows: “application for multi-stage regulatory approval” means an application for approval, consent or agreement required by a condition included in a regulatory approval where (in terms of the condition) that approval, consent or agreement must be obtained from the Scottish Ministers before all or part of the works permitted by the regulatory approval may be begun”.
- 7.1.3 A marine licence, if granted, by the Scottish Ministers for the Proposed Works, may have several conditions attached requiring approvals etc. which fall under this definition, for example the approval of a Construction Method Statement. When making an application for multi-stage approval the Applicant must satisfy the Scottish Ministers that no significant effects have been identified in addition to those already assessed in the EIA Report.
- 7.1.4 If during the consideration of information provided in support of an application for multi-stage regulatory approval the Scottish Ministers consider that the works may have significant environmental effects which have not previously been identified in the EIA Report (perhaps due to revised construction methods or updated survey information), then information on such effects and their impacts will be required. This information will fall to be dealt with as additional information under the 2017 MW Regulations, and procedures for consultation, public participation, public notice and decision notice of additional information will apply.

Signed

Gemma Girling

17 August 2026

Authorised by the Scottish Ministers to sign in that behalf.

Appendix I: Consultation Responses & Advice

Defence Infrastructure Organisation

From: [Redacted]
To: [MD Marine Licensing](#)
Subject: 20260420_0852Z-RE: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe - Consultation on Request for Scoping Opinion
Date: 20 April 2026 09:53:51
Attachments: [Redacted]

Good morning Liz,

Thank you for your email regarding SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe.

After our review, I can confirm that the MOD has no objections regarding this activity.

Kind Regards

Joanne Moore | Safeguarding Officer

Defence Infrastructure Organisation | National Armaments Director Group
Estates | Safeguarding

DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY
Email:[Redacted]

 **National Armaments Director Group**

Historic Environment Scotland

From: [Redacted]
To: [Elizabeth Skelton](#)
Subject: RE: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe - HES Information Requested - 29 April 2026
Date: 29 April 2026 11:58:11
Attachments: [Redacted]

[Redacted]

Good morning Liz,

Many thanks for this supporting material.

On the basis of the submitted information, I can confirm that significant adverse impacts on heritage assets within Historic Environment Scotland's remit are unlikely. Therefore, we would be content for cultural heritage topic area to be scoped out of EIA.

Kind regards

Urszula

**Urszula Szupczynska | Senior Environmental Assessment and Advice
Officer | Environmental Assessment and Advice Team | Heritage Directorate**

We inform and enable good decision-making so that the historic environment of Scotland is valued and protected.

Involved in decisions affecting the historic environment? See the Historic Environment Policy for Scotland at www.historicenvironment.scot/heps

Historic Environment Scotland | Àrainneachd Eachdraidheil Alba
Longmore House, Salisbury Place, Edinburgh EH9 1SH

T: 0131 668 8983

M: [Redacted]

E: [Redacted]



Lerwick Port Authority

From: [Redacted]
To: [MD Marine Licensing](#)
Cc: [Redacted]
Subject: RE: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe - Consultation on Request for Scoping Opinion - 24 March 2026
Date: 23 April 2026 11:47:40
Attachments: [Redacted]

**"FAO Elizabeth Skelton, Marine Licensing Casework Officer
Licensing Operations Team - Marine Directorate**

Liz,

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS
2017 ("the MW EIA Regulations")**

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe.

Thank you for the opportunity to comment on the Scoping Report submitted by Statkraft Hydrogen UK Holding Ltd (*Per Xodus Group Ltd*) in relation to their proposed Tagdale Green Ammonia Project - Dales Voe.

The proposed marine project boundary, including the proposed jetty and associated apparatus, is located within Lerwick Harbour's area of jurisdiction and port limits established under our statute as a Trust Port.

On behalf of Lerwick Port Authority (LPA) and referring to relevant paragraphs and sections within the Scoping Document, we would comment / highlight as below:

4.1.5 – SIC Marine Works Licence. The report states that authorisation from Shetland Islands Council in the form of a Marine Works Licence "will" be required for the construction of Marine Project infrastructure. This is incorrect. Under the Zetland County Council Act 1974, the requirement to obtain a Works Licence from Shetland Islands Council for works in the sea, or foreshore (below MHWS out to 12NM) specifically **excludes** works proposed within the area of jurisdiction of LPA.

4.1.6 – Lerwick Port Authority Works Licence. The report states that a Works Licence from Lerwick Port Authority "may" be required for any construction works. LPA acts as the licensing authority for any proposed works within its own area of jurisdiction. Any proposed works below MHWS within the defined limits of Lerwick Harbour **will** require a Works Licence from LPA under its own statute and powers, specifically Section 10 of the Lerwick Harbour Order Confirmation Act 1974.

5.4 – Decommissioning. The report states and suggests that the Marine Project Infrastructure is intended to stay in place "indefinitely" and that "no assessment of decommissioning impacts has been provided". Works Licences issued by LPA for marine works include clauses and obligations relating, but not restricted to, their construction, marking, lighting, maintenance, and removal. Decommissioning of marine infrastructure works should therefore be considered.

Other pertinent points that LPA consider to be relevant and require consideration include: -

- The potential risk of ammonia entering the atmosphere and marine areas during an escape incident when transferring from onshore by pipe, loading, and transportation, is not addressed by the applicant.
- The proximity of the proposed new jetty (*and its associated apparatus*) to LPA's existing operational marine infrastructure at Dales Voe, including within already established Safeguarding Zones of the licenced explosives berth at Dales Voe.
- In terms of construction activities, which are proposed over a 2-year period, it should **not** be

assumed that the existing Dales Voe quayside owned and operated by LPA will be available for said construction activities. It should also be noted that the existing Dales Voe Base and proposed site are not directly connected.

Regards
Calum Grains

Capt. Calum Grains
Chief Executive



Lerwick Port Authority, Albert Building, Lerwick, Shetland ZE1 0LL

T: +44 (0) 1595 692991 **M:** +44 ([Redacted]) **W:** www.lerwick-harbour.co.uk

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Maritime and Coastguard Agency



Maritime &
Coastguard
Agency

James Potter
Maritime and Coastguard Agency
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

15th April 2026

Via email: MD.MarineLicensing@gov.scot

Dear Elizabeth,

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (“the MW EIA Regulations”)**

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

Thank you for your email dated 24th March 2026, inviting the Maritime and Coastguard Agency (MCA) to comment on the Scoping Opinion provided by Statkraft Hydrogen UK Holding Limited (Statkraft) for the proposed Tagdale Green Ammonia Project Development at Dales Voe, Shetland.

The Scoping Report has been considered by representatives of Marine Safety and PNT Services, and we note that the project involves the development of a new green ammonia production facility in the Dales Voe Sea loch, north of Lerwick. It is forecast to produce up to 185 tonnes/day of green ammonia for decarbonising fertiliser production, maritime fuels, and energy storage. The proposed marine elements include (but is not limited to):

- associated infrastructure above Mean Low Water Springs,
- a new 160m jetty for exporting of Green Ammonia,
- associated subsea/nearshore infrastructure below Mean High Water Spring (MHWS).

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. We would therefore like to comment as follows on the Scoping Report:

1. The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine Scotland Act (2010) before carrying out any marine licensable works.
2. We understand that the site falls within the jurisdiction of a Statutory Harbour Authority (SHA), - Lerwick Port Authority. For any works undertaken in the SHA, the SHA is responsible for maintaining the safety of navigation within their waters during the construction and operational phase of the project. Therefore, to ensure the safe operation of marine activity for this project, the MCA would advise the developers to liaise and consult with the relevant SHA.
3. We note and welcome the Applicant’s commitment, set out in paragraph 13.1, to undertake a Navigational Risk Assessment (NRA) as part of the wider Environmental Impact Assessment (EIA), using a methodology aligned with MGN 654 Annex 1. The NRA will establish how the

phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). In the Scoping Report, the datasets for AIS and VMS vessel traffic are both taken from 2019, this data would need to be updated to within the last two years. The NRA must be reviewed and agreed by Lerwick Port Authority in its role as the Statutory Harbour Authority (SHA). In addition, we recommend that the Applicant has regard to the Ports and Marine Facilities Safety Code and the associated Guide to Good Practice. This will support the development of a robust Safety Management System for the marine elements of the project.

4. The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the Navigation Risk Assessment and further stakeholder consultation. Section 13.10 confirms that at this stage, no impact pathways are proposed to be scoped out.
5. The applicant has indicated in paragraph 13.9 that in-depth consultation will take place with key stakeholders who are relevant to shipping and navigation during the NRA/EIA process, which we welcome. However, the development area sits within Dales Voe Sea Loch, which also involves three other marine users, namely the Dales Voe decommissioning yard, which is currently planning an expansion, a Shellfish aquaculture farm and Lerwick Harbour. Therefore, we would like to suggest that the applicant also include the Scottish Fishing Federation and Dales Voe decommissioning yard in their consultee list to de-conflict any potential shipping and navigation hazards which may occur from local marine activity. The MCA will be interested to view the Pre-Application Consultation Report which will be submitted with the marine license application.

The MCA is satisfied with the scoping report at this stage as the basis for an Environmental Impact Assessment from the shipping and navigation perspective. The MCA would expect no effects to be scoped out of the assessment with regard to shipping and navigation, pending the outcome of the updated NRA and further stakeholder consultation.

I hope you find this information useful at this consultation stage.

Yours sincerely,

[Redacted]

James Potter
Marine Licensing and Offshore Consenting Lead
Marine Safety and PNT Services

NatureScot

From: [Redacted]
To: [MD Marine Licensing](#)
Cc: [Redacted]
Subject: Tagdale Green Ammonia Project - Reference Number 104922
Date: 22 April 2026 15:33:03

Dear Elizabeth

Thank you for consulting us on this scoping case.

We have the following comments to make on the Scoping Report:

11 Ornithology

Vessel presence (noise, physical presence, lights) leading to disturbance of seabirds and/or their displacement from foraging habitats – it is not entirely clear why the construction phase of the project has been scoped out, but the operation and maintenance phase scoped in. Marine Directorate, as competent authority, will have to undertake a Habitats Regulations Assessment (HRA) of impacts on East Mainland Coast Special Protection Area (SPA), so it would be prudent to assess construction phase (in addition to operation and maintenance phase) impacts to inform the HRA (the assessment only needs to be proportionate to the likely impacts).

The impact of disturbance and displacement of SPA birds by vessels transiting to the site during construction and operation and maintenance should also be included in the assessment.

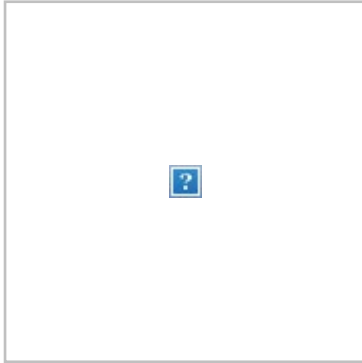
General

Where other potential impacts have been scoped out, full reasoning should be included in the Environmental Report, and mitigation to reduce impacts detailed (e.g. in CEMP) in the Marine Licence application.

Yours sincerely

Juan Brown

Operations Officer



NatureScot is the operating name of Scottish Natural Heritage

Northern Lighthouse Board



Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: SCOP-0074
Our Ref: JM/ML/L2_01_098

Elizabeth Skelton
Marine Licensing Casework Officer
Licensing Operations Team - Marine Directorate
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

31 March 2026

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("THE MW EIA REGULATIONS") & CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe.

Thank you for your e-mail correspondence dated 24th March 2026 regarding the scoping report submitted by **Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd)** relating to the Tagdale Green Ammonia Project at Dales Voe, Shetland.

We note the applicant will undertake a Navigation Risk Assessment with respect to the proposed development and that mitigation of the potential impacts to navigation will be consulted upon during this process. In addition we note the intention to consult with stakeholders including Lerwick Port Authority and the intention to issue navigation warnings, Notice to Mariners and Kingfisher bulletins in advance of proposed works as required.

Northern Lighthouse Board are content with the proposed EIA scoping report.

Yours sincerely

[Redacted]

Peter Douglas
Navigation Manager

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Scottish Environment Protection Agency

From: [Redacted]
To: [MD Marine Licensing](#)
Cc: [Redacted]
Subject: PCS-20008366 SEPA response to SCOP-0074
Date: 26 March 2026 14:28:21
Attachments: [Redacted]

To Whom It May Concern,

Marine (Scotland) Act 2010

SCOP-0074 - Tagdale Green Ammonia Project, Dales Voe

Thank you for the above consultation. We provided EIA scoping advice to Shetland Islands Council (SIC) on the terrestrial elements of the proposed development, plus regulatory advice for the applicant, in our letter to SIC of 27 January 2026 (our reference PCS-20007762, SIC reference 2026/007/SCO). Based on the information provided, it appears that the current marine consultation falls below the thresholds that SEPA provide site specific advice for. Please refer to our [Standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations](#), along with our development management standing advice and other guidance, which is available on our [website](#). If there is a significant site-specific issue that you would like our advice on that is not addressed by our guidance, letter to SIC or other information provided on our website, then please reconsult us highlighting the issue in question and we will try our best to assist.

from

Nina Caudrey

Senior Planning Officer



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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom

Scottish Fishermen's Federation

From: [Redacted]
To: [MD Marine Licensing](#)
Cc: [Redacted]
Subject: Re: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe - Consultation Extension Granted - 02 April 2026
Date: 08 May 2026 12:49:36
Attachments: [Redacted]

Good afternoon Liz,

The Scottish Fishermen's Federation (SFF) has reviewed the Scoping Report submitted in support of a request for a scoping opinion under the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 for the proposed Tagdale Green Ammonia Project at Dales Voe.

SFF notes that the proposed marine works comprise permanent industrial port infrastructure (export jetty and associated structures) intended to remain in situ over the operational lifetime of the project. The scoping report acknowledges the presence of fishing activity within and around Dales Voe but characterises this as low intensity and on that basis proposes to scope out a number of fisheries-related impact pathways.

SFF has sought available local information to inform this consultation. While no specific data have been identified indicating concentrated fishing activity within the immediate footprint of the proposed works, some fishing activity (including static gear and inshore dredging) is acknowledged in the wider area. Available information also indicates that established vessel transit routes generally pass to the east of the project location (approximately 1.5 nautical miles) and no immediate navigational concerns have been identified, subject to construction and operational vessel movements being conducted in accordance with COLREGs and standard marine practice.

However, SFF notes that the absence of detailed or high-resolution inshore fisheries data should not be taken to imply absence of use, particularly given the small spatial scale, seasonal variability and often under-represented nature of inshore static gear activity. Given the permanent nature of the proposed marine infrastructure, SFF considers it appropriate that fisheries and other commercial sea users remain a clearly defined receptor within the scope of environmental assessment for the proposed works, even where impacts are ultimately assessed as not significant.

In particular, SFF recommends that:

- The fisheries baseline includes a clear description of data limitations and uncertainty
- Fisheries interactions (including access, safety considerations and vessel movements) continue to be considered through construction and operation
- Construction and operational vessel activity should be conducted in accordance with COLREGs with appropriate marine coordination measures in place to ensure awareness of other sea users
- Ongoing engagement with local fishing interests is maintained as the project design and construction programme are refined.

Subject to the above, SFF has no further comments at this scoping stage.

Regards,
Oliwia

Oliwia Biros
Offshore Consents Assessments Manager

Scottish Fishermen's Federation

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Registered Address | Scottish Fishermen's Federation (SFF) | 24 Rubislaw Terrace | Aberdeen | AB10 1XE

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Shetland Islands Council



Shetland Islands Council

Executive Manager: Iain S McDiarmid
Director: Neil Grant

Elizabeth Skelton
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If calling please ask for:
John Rosie
Marine Planning Officer
john.rosie@shetland.gov.uk
Direct Dial: 01595 745681

Our Ref: **2026/005/MWSCO**
Your Ref: **SCOP-0074**

Date: 30 April 2026

Dear Ms Skelton

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the MW EIA Regulations")

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

Proposal: Scoping opinion request for marine elements of proposed Tagdale Green Ammonia development including a new 160m export jetty and associated subsea/nearshore infrastructure below Mean High Water Spring (MHWS)

Location: Dales Voe, Lerwick

Applicant: Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd)

Thank you for consulting Shetland Islands Council (hereafter referred to as 'the Council') as above. The consultation and Scoping Report was received by the Marine Planning Service on 24 March 2026.

In general, the Council considers the Scoping Report to be an appropriate basis to inform the preparation of an Environmental Impact Assessment Report (EIA Report). However, the Marine Planning Service has consulted the following internal Council Services and would therefore also offer the following advice based on comments received, which we request be taken into account in the preparation of the marine EIA Report.

We also received a representation from the Shetland Fishermen's Association which is also included below.

Shetland Islands Council Natural Heritage Team

These comments are made without prejudice to any future application or issues that we would raise in relation to this. These comments relate to the potential natural heritage, marine ecology, and fisheries and landscape and seascape impacts of the proposed Statkraft Green Ammonia Project at Tagdale, including the 160 m export jetty and associated subsea/nearshore infrastructure.

Key Issues and Considerations

1. Site selection

- The proposed site at Tagdale is situated in an undeveloped area of coastal landscape and marine environment. We consider that the EIA report should include an assessment of alternative sites. Any justification should clearly consider ecological, landscape, and cumulative effects, including marine receptors.*

2. Marine environment and fisheries data gaps

Comments raised by the Shetland Fishermen's Association (SFA), with which we agree:

- Publicly available reports produced by UHI Shetland from annual inshore fish surveys, including associated publications on spawning and nursery areas, have not been included. These should be used to inform Section 9 (particularly Section 9.5) of the EIA.*
- Ongoing research by UHI Shetland on flapper skate distribution and abundance around Shetland should be considered, and the institution consulted in relation to Section 9.5.4.*
- The Shetland Shellfish Management Organisation (SSMO) should be consulted to obtain data on shellfish distribution and abundance within the 10 km buffer.*
- Terminology: The description of a "voe" as a "sea loch" is incorrect and does not reflect local terminology or geomorphological distinctions. Accurate use of regional terminology is important for clarity and understanding of the local marine environment.*

Additional comments:

- Important Marine Mammal Area (IMMA): The entirety of Shetland is designated as an IMMA. Potential impacts on marine mammals - including disturbance from construction activities, vessel traffic, underwater noise, and subsea works - should be fully assessed within the EIA. Baseline conditions, sensitive habitats, and appropriate mitigation measures should be clearly defined.*

3. Seascape, Landscape and Visual Impacts (SLVIA)

- *We note that the scoping report states that the SLVIA will be fully considered by the Terrestrial EIA. While we have no objection to this in principle, we do not recognise the statement in section 3.2.1 that the SIC have agreed the scope of the SLVIA.*
- *Comments previously provided in relation to the SLVIA for the terrestrial EIA scoping (application 2026/007/SCO) did not explicitly address seascape impacts and were based solely on the terrestrial footprint of the proposed development. The SLVIA should therefore consider the full extent of the development, including both marine and terrestrial components. Until this information is provided, the Council is unable to offer definitive comments on the scope of the SLVIA, including the ZTV and viewpoint selection.*
- *With regards to seascape impacts we would repeat comments previously provided that water-based viewpoints should be considered to capture visual and perceptual effects for:*
 - *Ferry routes (e.g., Skerries ferry)*
 - *Recreational boating and marine tourism*
 - *Commercial shipping and industrial marine traffic*
- *Coastal Character Assessment guidance (Slater & Shucksmith, 2021), particularly Eswick–Bressay Coastal Character Area No. 2, should inform any seascape assessment.*
- *The above points will be key to assess the impacts of the marine elements of the work, and which currently do not appear to be included within the scope of the SLVIA.*
- *Clarification on lighting, including navigational lighting will be required in order to determine if a nighttime SLVIA is required.*

4. Environmental baseline and ecological scope

- *The 5 km study area defined for ecological receptors appears insufficient to capture wider marine and coastal effects. The basis for this spatial scope is unclear, and a clear justification should be provided. In particular, the applicant should define and justify appropriate zones of influence for each impact pathway. Given these concerns, we would welcome further engagement on this matter prior to submission of the EIA to ensure the proposed approach is robust. Assessments should include:*
 - *Benthic habitats potentially affected by subsea infrastructure*
 - *Marine mammals and bird species using Dales Voe and adjacent waters*
 - *Cumulative effects with other marine and terrestrial developments, including Mossy Hill Wind Farm and associated infrastructure*
- *Local consultation with the Shetland Amenity Trust and RSPB Scotland is recommended to support baseline data for protected species and habitats.*

5. Formatting and presentation issues

- *Maps and tables within the scoping report contain formatting errors (e.g., reversed maps, misaligned tables), reducing clarity. These should be corrected in the EIA submission.*

Conclusion

The scoping report for the Tagdale Green Ammonia marine works contains factual inaccuracies, omits key fisheries and ecological data, and does not fully consider seascape and marine visual impacts. Baseline surveys and consultation with local organisations are required to provide a robust assessment of potential impacts. The rationale for site selection at Tagdale must be clearly justified, and the EIA should fully integrate marine, ecological, and cumulative effects with appropriate mitigation measures secured.

Shetland Islands Council Planning Service - Development Management Team

I note that the terrestrial elements of this proposal have been subject to a separate Scoping Opinion (2026/007/SCO). The response from that should form the basis of our comments, and we have no comments to make with regards to the development below the mean low water spring tide level.

Shetland Islands Council Archaeology Service

No comments received.

Representation received from the Shetland Fishermen's Association (SFA)

We have reviewed the Scoping report for Tagdale and wish that the following points are considered within your process and fed back to the authors:

Section 9 Fish and Shellfish Ecology

- *The authors have not included the body of publicly available reports produced by UHI Shetland from their annual inshore fish surveys and associated publications and which relate to spawning and nursery areas. These are available through [University of the Highlands and Islands](#) and should be included to inform section 9.5 of the report.*
- *UHI Shetland is also undertaking research on flapper skate distribution and abundance around Shetland and should be contacted in relation to 9.5.4.*
- *The authors should contact the Shetland Shellfish Management Organisation (SSMO) for information regarding distribution/ abundance of shellfish within the 10km buffer john@ssmo.shetland.co.uk*

Terminology

- *To say that a 'Voe' is a 'Sea Loch' is incorrect and shows a lack of understanding. 'Sea Loch' is the descriptive term used on the Scottish mainland*

and west coast of Scotland to describe a long, narrow arm of the sea, usually glacially carved, often resembling a fjord and often with a shallow sill at the outer end. A 'Voe' is a regional term, almost exclusively in Shetland and Orkney, coming from Norse heritage and often forms part of a local place name. A voe is a sheltered sea inlet, not necessarily long or narrow and does not necessarily have the steep sides often associated with a sea loch.

Formatting.

- It is unhelpful that the pdf was not checked for formatting errors prior to submission. Most of the maps are shown in reverse and many of the tables have formatting issues, such that the contents of cells contain random letters, numbers or symbols.*

Subsequent comments received from the SFA

- I note that the pdf on MD-LOT is fine regards the maps and table formatting so it would look like there has been a corruption when it went on the SIC website. If you are appending my comments to your own, please acknowledge this update.*

Additional Comments

- The Council's Planning Service - Development Management Team, in their consideration of the scoping opinion request (ref: 2026/007/SCO) for the terrestrial EIA Report for the proposed development, carried out consultation with a number of statutory and non-statutory consultation bodies and the comments received were included in scoping opinion 2026/007/SCO issued on 06 March 2026. The comments contained in scoping opinion 2026/007/SCO relative to the marine environment should also be taken into account and inform the preparation of the marine EIA Report. Scoping Opinion 2026/007/SCO can be viewed [here](#).
- Consultation with NatureScot should be carried out in relation to potential impacts on nature conservation designated sites and protected species and habitats, including Priority Marine Features (PMFs), to inform the marine EIA Report.
- Consultation should also be carried out with the Tingwall, Whiteness & Weisdale Community Council and the Lerwick Community Council to inform the proposed development and marine EIA Report.
- The marine EIA Report should be developed in accordance with relevant local policy including the Shetland Islands Regional Marine Plan 2025 and the Shetland Local Development Plan 2014.
- Contrary to what is stated on Page 26 of the scoping report, a works licence is not required from Shetland Islands Council for the proposed development as the Council is not the consenting authority within the Lerwick Harbour limits. The Lerwick Port Authority should instead be contacted regarding any works licensing requirements.

- The proposal and marine EIA Report should be developed in accordance with the [Biosecurity Plan for the Shetland Islands](#) to prevent the introduction and/or spread of invasive non-native species (INNS).
- Chapter 9.5.6 of Scoping Report: Sea trout are likely to be present in Dales Voe and this is supported by Map 30 on Page 106 of the Shetland Islands Regional Marine Plan 2025. Sea trout are PMFs and are listed on the Scottish Biodiversity List. Impacts on sea trout should therefore be considered in the Fish and Shellfish chapter of the marine EIA Report.
- Chapter 10.5.3 of Scoping Report: Otters are likely to be present in Dales Voe and this is supported by Map 14 on Page 70 of the Shetland Islands Regional Marine Plan 2025. Otters are European Protected Species (EPS) and depend on the marine environment in Shetland for food. Impacts on otters should therefore be assessed in the Marine Mammals chapter of the marine EIA Report unless NatureScot advise otherwise.
- Chapter 12 of Scoping Report: There is an active mussel farm in Dales Voe and the waterbody is a designated Shellfish Water Protected Area. Consultation is therefore advised with the mussel farm operator (Blueshell Mussels) and Scottish Government Marine Directorate Science.
- Chapter 14 of Scoping Report: Consultation with the Shetland Regional Archaeologist (val.turner@shetland.gov.uk) should be carried out in relation to potential marine archaeology to confirm whether it can be scoped out of the marine EIA Report as proposed.

Yours faithfully

[Redacted]

John Rosie
Marine Planning Officer

Tingwall, Whiteness & Weisdale Community Council

From: [Redacted]
To: [MD Marine Licensing](#)
Subject: Feedback from Tingwall, Whiteness & Weisdale Community Council, Shetland.
Date: 19 April 2026 13:38:45

Re. THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (“the MW EIA Regulations”). CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

The Tingwall, Whiteness & Weisdale Community Council members have reviewed the scoping report and wish to request that the following items be included in the scope of the EIA:

1. A survey of rare minerals which may be found in the area, which are not mentioned in the existing report.
2. Any possible effects on the Shetland Honey business (and specifically on the health and behaviour of the bee colonies), which is located very close to the proposed site.
3. Monitoring of the the Tirricks (Arctic Terns) on Muckle Ayre, a well-known nesting site that is next to the proposed location.

Kind regards,
Paul

Paul Stevens — Clerk, Tingwall, Whiteness & Weisdale Community Council
[Redacted]
[Redacted]

UK Chamber of Shipping

From: [Redacted]
To: [MD Marine Licensing](#)
Subject: RE: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd (Per Xodus Group Ltd) - Tagdale Green Ammonia Project - Dales Voe - Consultation on Request for Scoping Opinion - 24 March 2026
Date: 14 April 2026 16:46:01
Attachments: [Redacted]

Dear Liz,

Thank you for the opportunity to respond. The Chamber has reviewed the shipping chapter to the Scoping Report and finds it as expected. Therefore we offer a nil return and look forward to the next stage of consultation with the developer.

Kind regards,
Robert

Robert Merrylees
Policy Director (Shipping Industry & Research)

UK Chamber of Shipping
30 Park Street, London, SE1 9EQ

DD +[Redacted]
Mob [Redacted]
[Redacted]
www.ukchamberofshipping.com

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Marine Analytical Unit

Tagdale Green Ammonia Project

Marine Analytical Unit (“MAU”) Response **Marine Directorate**

The Tagdale Green Ammonia Project scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

The application mentions that topics where the majority of the potential impacts will be a result of the terrestrial aspects of the Project, and where any marine impacts are anticipated to be minimal, will be covered in the terrestrial application. This includes the socio-economic impacts. If the applicant believes there are no socio-economic impacts related to the offshore Project, or that potential impacts are anticipated to be minimal, then clear justification should be provided.

The MAU believe that the National Marine Plan General Planning Policy 19 (*“Decision making in the marine environment will be based on sound scientific and socio-economic evidence.”*) is also relevant to this application. The MAU will be unable to assess against this policy if the socio-economic impacts related to the Project are not included in the offshore application. Therefore, the MAU recommends that a full socio-economic impact assessment is included in both onshore and offshore applications. General advice on how this could be delivered has been included in Annex 1. Please note that Annex 1 provides general guidance on aspects that could be assessed as part of the assessment of socioeconomic impacts. It is not prescriptive nor exhaustive but includes examples of best practice.

Annex 1: General Advice for Socio-Economic Impact Assessment

Marine Analytical Unit (MAU)

Marine Directorate

March 2025

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit (MAU), Marine Directorate.

Section 1. Some general best practice tips

- Take a proportionate approach to SEIA in line with the size of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
 - Social research and economist training, qualifications and experience
 - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes that affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

Section 2. Key components of a Socio-economic Impact Assessment

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods (see Methods Toolkit referenced at the end of this Annex) to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what the applicant wishes to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

Pre-scoping activities

- 1) Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.
- 2) Develop a detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.
- 3) Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).
- 4) Define potential impact areas on land** taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate

including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

- 5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.

- 6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

- **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts
- **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified
- **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)
- **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

- 7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact

prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys, interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

8) Produce list of anticipated impacts to be covered in the scoping report

setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Directorate to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

Post scoping activities for the SEIA

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

9) Conduct baseline analysis to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

10) Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal)

Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report. Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts;
- Leakage, displacement and substitution effects;
- Deadweight loss;
- Cumulative impacts;
- Sensitivity analysis to account for risk, uncertainty and optimism bias.

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.

Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts.

All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

11) Development enhancement, mitigation strategy and complete SEIA report.

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the

assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts. Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

Section 3. Examples of different types of socio-economic impacts

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

Examples of Socio-economic Impacts from Glasston 2017¹

1. Direct economic:

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

2. Indirect/induced/wider economic/expenditure:

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (e.g. tourism; fisheries);
- effects on development potential of area; and

3. Demographic:

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

4. Housing:

- various housing tenure types;

¹ Glasston J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), *Methods of Environmental and Social Impact Assessment*, Abingdon: Routledge

- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location, effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice.

Section 4: Useful Data Sources for Socio-Economic Impact Assessments

Name	Summary	Link to Source
Statistics.gov.scot	Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.	statistics.gov.scot
Marine Economic Statistics	Annual economic statistics publication including GVA and employment data for marine economy sectors.	Marine economic statistics - gov.scot (www.gov.scot)

Scottish Sea Fisheries Statistics	Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish fishing fleet and employment on Scottish vessels.	Sea fisheries statistics - gov.scot (www.gov.scot)
Scottish Shellfish Farm Production Survey	Statistics on employment, production and value of shellfish from Scottish shellfish farms.	Scottish shellfish farm production surveys - gov.scot
Scottish Annual Business Statistics	Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business.	Business and innovation statistics - gov.scot
Sub-Scotland Economic Statistics Database	The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.	Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)
Nomis Official Labour Market Statistics	Labour market statistics including data on employment, unemployment, qualifications, earnings etc.	Nomis - Official Labour Market Statistics (nomisweb.co.uk)
Economics of the UK Fishing Fleet 2020	Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.	Economics of the UK Fishing Fleet 2020 — Seafish
Scotland's Census, National Records of Scotland	Census data that provides information about the characteristics of people and households in the country.	Scotland's Census National Records of Scotland (nrscotland.gov.uk)

Scottish Index of Multiple Deprivation	Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.	Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)
National Records of Scotland mid-year population data	Population estimates on an annual basis for Scotland and its constituent NHS Board and council areas.	Mid-Year Population Estimates National Records of Scotland (nrsotland.gov.uk)
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)
The Magenta Book	HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.	The Magenta Book - GOV.UK (www.gov.uk)
Enabling a Natural Capital Approach (ENCA)	Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account.	Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)

Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: [The Green Book: appraisal and evaluation in central government](https://www.gov.uk/government/publications/the-green-book)

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: [Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects](https://www.iaia.org/publications/guidance-for-assessing-and-managing-the-social-impacts-of-projects)

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: [Offshore renewables - social impact: two way conversation with the people of Scotland](https://www.gov.scot/publications/offshore-renewables-social-impact-two-way-conversation-with-the-people-of-scotland/pages/introduction.aspx)

Best practice guidance for assessing the socio-economic impacts of OWF developments: [Guidance on assessing the socio-economic impacts of offshore wind farms \(OWFs\)](https://www.gov.uk/government/publications/guidance-on-assessing-the-socio-economic-impacts-of-offshore-wind-farms)

[A toolkit of methods available to assist developers, consultants, and researchers carrying out socio-economic impact assessments: Methods Toolkit for Participatory Engagement and Social Research - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/methods-toolkit-for-participatory-engagement-and-social-research/pages/introduction.aspx)

Transport Scotland

From: [Redacted]
To: [MD Marine Licensing](#)
Cc: [Redacted]
Subject: SCOP-0074 - Statkraft Hydrogen UK Holding Ltd - Tagdale Green Ammonia Project - Dales Voe - Response to Request for Scoping Opinion - 16 April 2026
Date: 16 April 2026 15:18:27
Attachments: [Redacted]

FAO Elizabeth Skelton

Elizabeth

Thank you for the opportunity to comment on the Scoping Report (SR) produced in support of the proposed green ammonia facility in Dales Voe sea loch, located approximately 3.5km to the north of Lerwick, Shetland.

I note that the SR supports the marine components of the Project, and that the Applicant intends to submit a separate Scoping Report for the terrestrial components, where the topic of Onshore Traffic and Transport will be considered.

I can confirm, therefore, that Transport Scotland has no comment to make on the marine SR and will be pleased to comment on the terrestrial SR when this is made available.

Kind regards,

George Smith
Development Management
Network Operations
Roads Delivery and Operations Directorate

transport.gov.scot

Transport Scotland 5th Floor 177 Bothwell Street Glasgow G2 7ER



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Appendix II: Gap Analysis

Applicant to complete:

Consultee	No.	Point for Inclusion	EIA Report Section	Justification
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