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Foreshore Section
Department of Housing, Planning
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Newtown Road
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Ref No. FS007031

To whom it may concern:

The National Inshore Fisheries Forum welcomes the opportunity to make a submission on the application for a Foreshore Consent by North Irish Sea Array Windfarm Ltd., which is a wholly owned subsidiary of Statkraft Ltd. for the purpose of carrying out site investigation works to inform the engineering and detailed design of the offshore wind farm to a sufficient level to allow detailed engagement with the supply chain so as to enable participation in a RESS auction.

To give you some background the National Inshore Fisheries Forums was established in 2014 to encourage fishermen using small vessels to participate in the management of fisheries within 6 nautical miles of the coast. The National Inshore Fisheries Forum is supported by six regional Fisheries Forums who bring forward regional proposals to NIFF for wider industry discussion.

We welcome the initial engagement that Statkraft has provided to the South East and North East Regional Inshore Fisheries Forums by meeting with them and providing an introduction to the project. These RIFFs are in the area most affected by the proposed investigation works. Point 1.10 “Describe any consultations undertaken to date with other foreshore users” in the application is incorrect as although Statkraft did email the National Inshore Fisheries Forum (NIFF) for assistance in setting up meetings with the regional forums affected, Statkraft has yet to meet with the NIFF. Unfortunately, we have not been able to find suitable dates for a meeting as the NIFF has been extremely busy with the serious issues affecting the sector at present, for example poor weather and lack of fishing opportunities and the unfolding crisis in the global seafood markets.

We understand that Statkraft have recently appointed a Fisheries Liaison Officer (FLO) for the project and understand he has been trying to contact the North East RFF secretary in recent times. We look forward to meeting with him to further discuss the issues that the fishermen are concerned

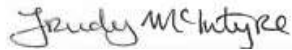
with regarding this application but feel it would have been useful to have the FLO in place before the application was submitted. This would have provided the FLO with a full picture of the extent of fisheries in the area of the proposed investigative works. We note from the Stakeholder activity timetable that more meetings are to be provided and we look forward to continued engagement with Statkraft.

The NIFF recently has become aware of a number of windfarm foreshore applications and wish to first make the following general points:

- Based on our collective experience, the level of Inshore Fishing activity described in the application is grossly under estimated. This may be partly due to the fact that it is mostly compiled by using AIS data, but pre-application consultation would have greatly helped putting an accurate picture of fishing activity in place.
- We acknowledge that this application is for site investigation works, but we believe that these works can negatively affect the financial viability of the fishing enterprises that inshore fishermen depend on, for their livelihoods.
- While companies that wish to engage in offshore activities such as windfarms have time and resources to prepare applications, stakeholders such as fishers have little time and resources to respond. By the time they find out about such an application under a Public Consultation it is too late to effectively organise a response. They see themselves at best reactionary to something that they feel is going to happen whether they like it or not, with some minor concessions.
- It is our view that there is a collective State responsibility to ensure that the fisheries sector including inshore fisheries is protected, due to the contribution made by the sector to local coastal communities.
- Policy and guidelines for the foreshore license application process for wind farms and other such activities (electrical and telecommunication cables, pipelines etc.) must be reviewed and overhauled, in order to protect existing stakeholder actives such as fisheries, to include for example;
 - The responsibility of the State to either ensure that adequate knowledge of fishing activities is made available to applicants, or that the onus is placed on applicants to obtain it before an application is submitted.
 - Applicants must in advance of an application make available for stakeholders the likely impact of their activity on for example fisheries. This should in include the implications of the survey techniques employed (in the case of the current windfarm applications), but also the overall likely impacts of the overall project once completed (i.e. the impact of the wind turbines when in place on fisheries).
 - The onus must be placed on applicants to adequately consult with stakeholders before submitting an application.

The importance of the Fisheries Liaison Officer not only meeting the NIFF and the relevant RIFFs but the actual fishers fishing in the area of the application cannot be emphasised strongly enough. They will know what is being fished and at what time of year. In conclusion many species are fished in the area outlined in this application and livelihoods of inshore fishermen and their coastal communities are dependent on it. The NIFF hope that you will give our submission due consideration and we look forward to further consultation between the applicant and the inshore sector going forward.

Yours sincerely,



Trudy McIntyre
NIFF Chair