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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 SSE Renewables Ireland for the purpose of carrying out site investigation works to assess the viability of areas off Bunmahon Bay, County Waterford and Bannow Bay Co. Wexford for the potential development of an offshore windfarm approximately 25km offshore.

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.

To say we are disappointed with the total disregard of the inshore fishing industry by this applicant, is an understatement. As the largest stakeholders in our coastal waters and as the consultative structure for the Inshore Fishing Sector we are deeply disappointed that there was NO consultation with the sector and it's representatives by the applicant, at the pre-application stage. This is in spite of the guidelines published on your website. We also understand that as part of a planning conditions for a wind farm the applicant must have a fisheries liaison officer in place. Although SSE representatives have met with the SE Regional Inshore Fisheries Forum in April 2019 in regard to the development of wind turbines at the Arklow Bank there has been no contact in regard to the application above by SSE Renewables. Inshore fishermen are working within the areas covered by this application for foreshore consent however they were not consulted.

The NIFF have recently 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.
- We note that there are two foreshore applications by separate companies that overlap to a large extent the important inshore and other fishing areas of the southeast coast.
- 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 activities 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 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 NIFF also wish to inform you in more detail of the Inshore Fishing operations which depend on the area in this application and include the following:

- Crustaceans including lobster, crab and shrimp.
- Shellfish/Bivalve molluscs such as scallop, razors, clams and mussels.

- Whitefish by use of nets are also fished for in this area.
- Pelagic species such as Herring spawn within this area and it is vitally important to the sustainability of the stock. Therefore, there are certain times of the year where it would not be advisable to work in this area. Sprats are another pelagic species that also aggregate in this area.

In conclusion you can see that many species are fished and spawn 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 better consultation between the applicant and the inshore sector going forward.

Yours sincerely,

Trudy McInyre
NIFF Chair