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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 License by Energia Renewables ROI Ltd. for the purpose of carrying out site investigation works to assess the viability of areas off the coastline of County Waterford for the potential development of an offshore windfarm approximately 5km off Helvick Head, County Waterford.

To give you some background the National Inshore Fisheries Forum (NIFF) 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. For further information on the Inshore Fisheries Forums can be found at <http://inshoreforums.ie>.

To say we are disappointed with the total disregard of the inshore fishing industry by this applicant, is an understatement. Inshore fishermen are working within the area covered by this application for foreshore license, however, there was no consultation with the sector or its representatives by the applicant before submitting the application despite the guidelines published on your website. We also understand that as part of a planning condition for a wind farm the applicant must have a fisheries liaison officer in place.

While the NIFF recognises growing climate awareness in Ireland and the look to renewables such as wind as an alternative energy supply, we are concerned that this is going to be at the cost of our industry, without any organised debate or joined up policy recognising the existence/value of the fisheries sector.

The National Inshore Fisheries Forum wish to make the following observations on the application:

- In the main Foreshore application document submitted in section 1.1 the applicant states that a site selection process was undertaken and lists a set of criteria that were considered. However, while ecological and other constraints are listed, fisheries are not mentioned as a consideration. This is a major omission and speaks volumes as to either the lack of knowledge of, or consideration for the livelihoods of fishermen that for generations have fished the area. There is no level of fishing activity described in the application. This may be partly due to the fact that fishing activities are mostly compiled by using AIS data, but pre-application consultation would have greatly helped to put an accurate picture of activity in place. Section 2.9 asks about proximity to sensitive locations and specifically asks about fish spawning areas. However, the applicant while mentioning some aquaculture and bivalve production areas, does not mention recognised fishery spawning and recruitment areas such as for herring and key inshore species such as lobster and crab.
- While the NIFF acknowledge that the application is for site investigation works, we believe that these works can negatively affect the financial viability of the fishing enterprises that inshore fishermen depend on or their livelihoods. We have particular concerns about some of the survey techniques referred to in section 1.3 such as 'sub-bottom profiler (Sparker/boomer)'.
- We note that there are two foreshore applications currently being consulted on by two separate companies that overlap to a large extent important fishing areas of the southeast coast. This is causing confusion within the industry and a heightened fear that fishing is going to be impacted.
- The inshore fishing operations of 50 plus fishing boats depended on in this application area include the following;
 - Crustaceans including lobster, crab and shrimp occupy the entire inshore zone along the coast where the proposed survey for cable routes are indicated.
 - Shellfish/Bivalve molluscs such as scallop occupy a larger proportion of the proposed windfarm site.
 - Whitefish and pelagic fisheries exist through all of the proposed windfarm and cable route areas.

The NIFF also wish to add the following general points that while relevant to the application pertain also to the impact of the overall foreshore license application process in general on inshore fisheries (and other fisheries).

- 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 at best some minor concessions to be gained.

- 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. The sector should not have to react to every application on a case by case basis in this manner without formal support of its position. What has happened to the Marine Spatial Plan that is required under EU legislation/directives. Due to the size and scale of this application, proposals such as this cannot be considered adequately without an overall spatial plan taking into account all of the current recognised stakeholders activities such as fishing.
- 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. The current foreshore application form details in a strong sense the ability of the applicants to demonstrate their awareness of Natura 2000 sites and other environmentally designated areas. The activities of existing stakeholders such as fishing should at least have the same required consideration.
 - 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) including:
 - Initial survey work and later during construction/installation, where there is legitimate fear that such activities can cause a reduction in habitats and fish. The fishing industry in general is unfamiliar with survey techniques used and these need to be detailed /explained.
 - In consultations to date regarding other wind farm developments we have been told by windfarm company representatives that there will be no exclusion zones around turbines to fishing activities. However, fishermen have received informal advice that the relevant State authorities may not consider fishing close to turbines as safe due to increased flow of currents around them and potential or entanglement of fishing gear. This would result in an effective loss of fishing area.
 - Some windfarm representatives have also stated that they have worked with fishermen in the UK where windfarms have been shown to happily coexist with fishing activities however we have not yet been furnished with any evidence such as studies or reports.
 - The onus therefore must be placed on applicants to adequately research fishing activities and to consult with stakeholders before submitting an application in order to;

- Validate the extent of fisheries.
- Outline the extent of their intended application and the potential impacts of both survey methods, construction and long-term impacts.
- Take onboard the input of fisheries at an early stage.

To facilitate the above points the NIFF recommends that representatives of your Department meet with representatives of the inshore fisheries sector through the Inshore Fisheries Forums or other representative structures.

In summary we ask that this application be rejected as it is incomplete/premature for the reasons stated. We recommend that the above points are taken onboard and before any proposal is lodged in the future and that at a minimum the inshore fisheries sector are meet with by the applicants as stated in the last bullet point above.

Yours sincerely,

Trudy McIntye
Chair, National Inshore Fisheries Forum