Scottish Sea Angling Conservation Network

Supplementary

Offshore Wind Consultation Response

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SSACN - Offshore Wind Consultation Response - Addendum

This supplementary paper follows on from the original response on behalf of the members of the Scottish Sea Angling Conservation Network (SSACN - www.ssacn.org) and highlights specific concerns we have regarding the potential impact SW2, SW3, SW4, and SW5 may have on tope shark and elasmobranch stocks.

Tope shark are a migratory species which spend the summer months in the shallow inshore waters of the Solway before returning each autumn to the rich feeding grounds of the Bay of Biscay and the Azores.

There is documented evidence to show a direct migratory route from Isle of Man to Luce Bay and also that tope use the area encompassed by the proposed farms as a breeding ground.

The tope shark is protected in England and Wales as they are thought to be vulnerable according to the International Union for Conservation of Nature (IUCN) and anecdotal evidence suggests there numbers are falling rapidly.

Tope are sought, on a catch and release basis, by sea anglers as a prize fish. Many of the anglers are members of the Scottish Shark Tagging Programme (SSTP www.tagsharks.com) which gathers data to help establish management plans.

The paper “Environmental and Ecological Effects of ocean renewable Energy development” by George w. Boehlerrt and Andrew B Gill suggests :

> *Wind turbines will affect fish community structure through changes in species composition (Wilhelmsson et al., 2006).*
>
> *Structures will result in attraction of both pelagic and benthic species. Structures will likely increase the settlement habitat for some species, and diversity and abundance of others in the regions of the renewable energy devices, but it is uncertain to what degree population size will change and thus, whether an impact will occur.*
>
> *Attraction of large predatory fishes that were absent in the pre-deployment habitat may result in increased mortality of resident species as well as new species attracted to the devices. Fish that migrate through areas where renewable energy devices will be deployed may be affected. Behavioural effects resulting from electromagnetic fields or acoustic signals, or a combination of such stressors could impact movement patterns of these species. Whether there are any interactions between these effects and whether they constitute impacts remain to be evaluated.*

SSACN wrote to the co-author Dr. Andrew B Gill PhD who is acknowledged as one of the UK leading academics on wind turbines and affects on the marine environment, voicing our concerns on the possible effects of a migration barrier for the tope shark. He replied :

> *I understand your potential concern and I wish I could provide you with an answer. Unfortunately we know far too little to be able to make any kind of judgement about things like migration barriers. You are right to raise it as a question. From available evidence (http://bit.ly/b2f4d7) we know that some benthic elasmobranchs can respond to subsea cables.*
>
> *However this is the first study of its kind so we are woefully lacking evidence and research is limited mainly because funds tend to go more towards birds, marine mammals and species of conservation designation. There is obviously much more understanding required so the only way forward is to keep asking the questions until there are clearer answers.*

The authorities and the developers need to be made aware and take responsibility for ensuring the right environmental questions are being posed and addressed whether the outcome is positive or negative, we can't just assume.

The importance of apex predators in a well balanced ecosystem is well documented and the loss of the tope could have negative affects on the whole ecosystem.

Additionally, the government's own study into the economic impact of sea angling to the Scottish economy showed that the income derived in the region from tope fishing runs into millions of pounds; naturally the loss of the fishery would cause many jobs to go in the charter, tackle hotel and B&B trade and supporting service industries to be lost.

We are extremely concerned by the lack of research which has been undertaken into the impact of operations during the life-cycle of a wind farm on inshore stocks and habitats, especially those of the various species of elasmobranchs which use the area for migratory, breeding or nursery purposes.

It is impossible to say at this stage whether the proposed wind turbines will provide a migratory barrier or destroy the breeding / nursery areas, but SSACN hopes the government will adopt the precautionary approach and insist the necessary research, including input from the sea angling sector, is carried out before planning consent is given.

Should you wish to discuss any aspect of the above, please do not hesitate to contact us via contact@ssacn.org.

Yours faithfully

Steve Bastiman

SSACN Chair

Appendix B. RESPONDENT INFORMATION FORM

1. Name/Organisation **The Scottish Sea Angling Conservation Network (SSACN)**

Title **Mr**

Surname **Bastiman**

Forename **Stephen**

2. Postal Address – **62 Lounsdale Drive, Paisley, Renfrewshire**

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3. Permissions
I am responding as… **Organisation**

(c)
The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Please tick as appropriate **Yes X**

(d)
We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate **Yes X**