Scottish Sea Angling Conservation Network

Offshore Wind Consultation Response

Offshore Wind Consultation Response

This response is on behalf of the members of the Scottish Sea Angling Conservation Network (SSACN - www.ssacn.org).

A major concern for us is that no sea angling representative body was included in the development of the SEA or Consultative document - a glaring omission in light of the Government's own report into the economic impact of the sea angling sector and the fact that the vast majority of sea angling effort takes place within 6Nm of the coastline ie: typically in those areas being considered.

Equally concerning is the lack of research which has been undertaken into the impact of work during the various phases of development of a site on the existing stocks and habitats of the species of interest to sea anglers, especially those of the various species of elasmobranchs, some of which are understood to be highly sensitive.

Of particular concern is the fact that many of the sites are located near the migratory routes of elasmobranchs and/or near their breeding / nursery areas and those and other species.

Additionally we would like to offer the following general observations:-

1. The SEA is incomplete in many respects from a sea angling perspective, in particular :
    1. The strategic environmental objectives used to assess the short and medium term options did not include any directly related to the sea angling sector.
    2. The focus on fish stocks was solely on those of interest to the commercial sector, consequently issues related to 'recreational' species were not identified.
    3. The effect of EMF on various species of fish, especially elasmobranchs is identified but not quantified – this research needs to be done and the appropriate mitigation defined as several proposed sites are on migration, nursery or spawning areas.
2. The proposals make no provision for the completion of research into the 'as is' situation of marine habitats and biodiversity which we believe necessary for the integrity of any future review of the impact of the developments.
3. We feel a community fund type scenario, similar to those associated with onshore wind farms could be leveraged to fund research MPAs set up to along the lines of a SSACN 'Angling Regeneration Centre (ARC)' – see Appendix A.
4. SSACN have in place tagging programmes which, suitably supported, could be extended to gather the data essential to support national policy.

In the following pages we highlight our concerns, identify some opportunities and respond to your questionnaire in the areas we believe generally applicable to sea angling, but overall we are concerned that the proposals as they stand have not really considered their impact on the species and environments associated with sea angling activity.

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

Yours faithfully

Steve Bastiman

SSACN Chair

Opportunities for impacting fish stocks and their habitats.

Marine wind farms have varied impacts on the environment throughout all stages of their development - from feasibility to decommissioning. These are mostly short term, however, the operational phase is likely to be a major source of long-term impact.

Activities likely to cause short term impacts are :

- seismic exploration;
- intense noise due to ramming/piling, drilling and dredging operations;
- increased vessel activities during exploration and construction;
- increased turbidity due to construction and cable laying; and, later,
- decommissioning of wind farms which may involve the use of explosives.

Activities likely to cause long term impacts are :

- the presence of the structures ;
- continual operational noise and transmitted vibrations;
- electromagnetic impacts due to cabling (may be of particular concern for elasmobranchs (Gill & Taylor, 2001)); and,
- increased vessel traffic, from maintenance operations, for instance.

Though some of these impacts may be limited within themselves, their cumulative effect may have far greater impact on both local and regional scales.

Areas of Concern

The very general terms in which the proposals are currently drafted leave areas of varying levels of concern; at this stage we would like to seek clarification and/or reassurance on the following issues:

Assessing Impact

For many years, successive governments have dismissed sea angler's local knowledge of the decline of numbers and average size of target fish species (cod and haddock in the Clyde for example) on the basis that the evidence is anecdotal and that only scientific evidence is acceptable.

We are extremely concerned that the current proposals for offshore wind development do NOT appear to require any scientific research regarding the ecosystems of species of interest to sea anglers which we feel will inevitably be affected.

As you will be aware, SSACN, through its Scottish Shark Tagging Programme (SSTP – www.tagsharks.com) are currently trying to gather data to inform policy on marine exploitation and conservation e.g. by arranging intensive tagging programs on vulnerable shark species in Lochs Etive, Sunart and the Solway Firth.

Q. Will the Government make it a condition of any future consent that the developers undertake comprehensive surveys of the entire marine ecosystem to inform decisions regarding feeding and breeding areas and migration routes to and through the development areas.?

Q. How will the Government assess the impact of developments on marine eco systems?

Exclusion zones / planning conditions
How will the exclusion zones necessary for safe construction and operation of the facilities be policed?

Q. Will the required exclusion of commercial trawling (with heavy gear which might damage the electrical apparatus) be unnecessarily extended to include the banning of sea angling ?

- We note that in the Robin Rigg Bill as presented, 'trawling' is defined as "any fishing activity which involves dragging a net OR LINE along the seabed". This definition could be interpreted to prohibit angling by rod and line which prohibition we feel is unnecessary and unreasonable.

Q. How will the Scottish Government enforce the planning conditions ?

- For example, the Robin Rigg Bill obliges the developer to bury intra farm cable at 1m below the sea bed and shore connectors from the substations at 3m or greater.

Q. Will the cables be buried by trenching or covering with rock armour ?

- If either / both, will environmental impact surveys be undertaken ?
- What measures will the Government take to police / enforce the requirements for buried cable works ?

If developments steer clear of the main shipping lanes then they are likely to be moved further into the areas typically used by anglers in kayaks and boats.

Impact on fish species of interest to sea anglers.

We are concerned that the development of offshore facilities and the attendant introduction of alien electrical impulses and variations in natural emf background levels, could materially affect the feeding, breeding and migration patterns of many fish species.

Fish which use electric or magnetic senses to hunt and feed may find any increase in background electric field intolerable and we have seen no evidence of any research addressing this issue.

R. Certain works may impact migratory species which are likely to be attracted to a particular geographic location at a point in their life-cycle or at specific times of the day/year, operations in such areas should be timed appropriately and carried when those species are not present.

Q. Is the Government aware of any research which identifies the impact of EMF on the already vulnerable elasmobranch species (skate, rays, shark, tope and dogfish) which are important sea angling target species and could be particularly affected. ?

Q. What is the Government going to do, or require the developers to do, to measure and avoid or minimise/mitigate what could be fatally serious EMF levels ?

At present there is little hard data on the feeding and migration patterns of these species. SSACN is trying to develop such data but an enhanced programme will be required to extend the coverage to other species / areas. We feel the Government and field developers have a part to play in facilitating that enhancement.

R. A suitable funding package should be put in place.

If as a result of construction or operation of offshore wind facilities, feeding breeding or migration patterns are significantly affected this will have a major impact on sea angling activity, with consequent economic impacts for the areas affected.

Q. How will the Government fund and resource or otherwise advance the research to provide statistically significant data prior to the construction of offshore turbine sites?

Q. If as a result of the construction or operation of offshore wind facilities, recreational or commercial sectors suffer loss of income, how will this be addressed ?
Many small boat owner/skippers do not have the marine education and competence which commercial skippers are expected to possess.
As there will be great difficulty in ensuring that that eg 'notices to mariners' will be picked up by or heeded by the majority of small boat owners we would urge the Government to ensure that developers are required to clearly buoy and mark the perimeter of all exclusion zones whilst those zones are active.

Q. How will the Government require developers to mark and delineate their activities to provide some security and information for those small-boat owners ?

The sea angling charter boat community is likely to be less welcoming, on the basis that large areas of tradition open access angling areas will be closed for business. Some of the areas of known particular concern include large parts of the Solway Firth which are a popular area for charter fishing, the Forth array, which is in an area which has been extensively targeted by charter angling, and some areas off the Western Isles which have recently begun to attract increasing charter effort.

Q. If as a result of fish disturbance and/or exclusion zones, charter boats suffer loss of income, how will this be addressed ?

The maps provided in the consultation document are not drawn at a sufficiently large scale to provide enough detail for assessment of specific impact for RSA effort.

Q. Could more detailed downloadable charts be made available providing large scale mapping which will allow us to more accurately identify where there may be conflict with existing or future sea angling activity.

<u>Opportunities for sea angling activity to be enhanced and improved</u>

Land based infrastructure

There is scope for increasing sea angling's land-based infrastructure eg: all weather harbours, all-tide slipways, boat storage areas etc during the construction and ongoing operation of wind farms, providing facilities are designed to accommodate and be made available to sea anglers.

Something broadly in line with the onshore wind farm community fund type scenario could provide a suitable funding vehicle to enable the introduction of research MPAs set up along the lines of a SSACN 'Angling Regeneration Centre (ARC)'.
R. We would strongly urge the Government to consider making developing such provisions a requirement of any planning approval granted for any future wind farm development.

R. Any shore based facilities provided by the developers may offer useful easily accessed new stances for shore angling, and we would urge the Government to make it a condition that such facilities be designed to take account of this possible usage.

Fish aggregation

There is considerable scope for improvement in the marine eco system sustainability and diversity around fixed offshore installations. Seabed structures provide a habitat for the accretion of sea life and the development of localised food sources for certain fish.

We would expect that many RSA target species (pollack, conger eel, wrasse, coalfish) will find the new structures to be ideal habitat, and other species (cod, ling, haddock) should find the exclusion zones of great benefit, and allow for some recovery of stock levels in those areas previously subject to excessive exploitation.

R. We would strongly urge the Government to make it a condition of any planning consent that all 'permanent' structures are designed, built and operated in a way which prohibits the use of any aggressive anti-fouling systems, any use of chemical impregnation or any electro/mechanical process for preventing or discouraging natural colonisation.

We anticipate that others will comment on the need to avoid adverse impacts on seals, otters and cetaceans. We would simply note in passing that any increase in subsea acoustic interference from e.g. vibration or frictional noise is likely to have a devastating affect on the feeding / migration patterns of important species whose natural stock levels have already suffered significant adverse impact through excessive exploitation and that further research is required into the effect on species use of the inshore habitats and their behavioural responses to electric fields.

There is scope for the development of new sea angling fisheries in areas which are currently void of targetable fish. Areas where sea angling activity has for many years been absent due to the depletion of the target fish species, may in the future recover.

The exclusion zones which will be necessary for safe construction and operation of the turbines will hopefully create marine wildlife preserves where the ecosystems might recover from many years of excessive exploitation / mismanagement.

The following pages address the specific questions asked regarding the consultation.

Offshore Wind SEA – consultation questions

1. Does the mapping of exclusion zones, environmental issues, and technical issues provide a reasonable basis for modelling the options?
   - NO. There is no recognition of the potential impact on marine environments and fish species which are important to the sea angling community, and no attempt to identify where sea angling is an important contributor to the local economy

2. Do you have any further technical or environmental information you think we should take into account as we refine the Draft Plan?
   - Data regarding the feeding, breeding and migration / population levels of all species of interest to sea anglers is required.
   - Though the Government is supporting a limited set of data gathering we believe it must take responsibility for obtaining or requiring this information before granting any further permissions for development.

3. Do you consider that the Draft Plan presents a set of practical options?

4. Should any options be removed from the Draft Plan?

5. Are there other options we should consider in the medium or long term?
   - We believe there is significant scope for the imposition of 'planning gain' on developers, and would wish to see requirements for the permanent shore facilities built for the construction and servicing of offshore wind systems to be designed as suitable for and made available to, shore based RSAs, small boat anglers and other recreational users as appropriate.

6. How can the Draft Plan be improved? What should be taken forward differently and why?
   - There is a requirement for an 'as is' marine ecology survey to ensure the developments do not have catastrophic effects on the feeding, breeding or migration patterns of important target species including specifically skate, tope, rays, smoothhound and spurdog

7. Do you have views on the scale and pace of development that could be sustainably accommodated in STW, taking into account the findings from the SEA and the technical assessment?

8. Have we got the balance right in the Draft Plan, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts?
   - NO – local economic development could be greatly enhanced for minimal additional cost by ensuring any developments maximise their contribution to local recreational economies.

9. The Plan, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often should this be done and why?
   - Independent marine ecology surveys should be undertaken before, during and after the developments to enable an environmental impact assessment to be performed - any 'lessons learned' should be incorporated in future developments.

10. The SEA has identified that there could be significant adverse effects, from the Draft Plan as a whole, on Scotland's landscapes and seascapes. Measures for the mitigation of these effects have been identified in the SEA environmental report.

11. Do you have a view on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?
    - There will be some in the sea angling community who are vehemently opposed to marine developments of any description as a restriction on their rights to fish and a deterioration of the environment in which they fish.
    - Many sea anglers go fishing to 'escape' from stressful lives and occupations by enjoying the peace and tranquillity of the offshore environment. The impact of the construction of industrial facilities where they fish will inevitably cause concern.
    - Others may be happy to see the development of a series of what are effectively marine wildlife preserves and may look forward to improved angling prospects, provided of course, there would be no intention to restrict their access.

12. Do you have any other views on the findings of the SEA? do you think that all the environmental effects (positive and negative) have been identified? Are there other issues that we should be taking into account in the preparation of the Draft Plan?
    - No.
    - As with the offshore oil and gas in the past, the pre-installation and construction phases probably offer the greatest opportunity for adversely impacting marine environments and stocks of species of interest to sea anglers.
    - More specifically, there has been insufficient research into the impact on fish species of seismic surveys, electro-magnetic forces, sound / vibration transmissions and other such factors.
    - Certain works may impact migratory species which are likely to be attracted to a particular geographic location at a point in their life-cycle or at specific times of the day/year, then operations should be timed appropriately and carried when those species are not present.
    - There is anecdotal evidence that a wind farm off Rhyl, Wales caused the tope to move on, if this were to be replicated in Scottish waters, local economies which benefit from the sea angling activity could be devastated.

13. The Draft Plan has identified environmental and technical issues in the north and north west regions of Scotland, in particular. It may therefore be reasonable to give further consideration to these regions.

14. Do you think that development in these or other regions, or individual options within them, should be given lower priority or perhaps deferred to the longer term.

Appendix A . Angling Regeneration Centres

Sea angling is part of our national heritage. It is a socially inclusive, environmentally friendly, low impact and selective fishing activity which increases the quality of life of its participants; and is enjoyed by young and old, male and female alike.

Sea angling contributes more than £150 million /yr to the Scottish economy, much of it in coastal communities where alternative opportunities are severely limited.

Most of the species which are of interest to anglers are of limited commercial value, yet for the past two decades or so, sea anglers have witnessed a severe decline in the numbers and size of fish species available to them.

The decline of fish stocks not only denies sea anglers access to quality fisheries, but threatens the viability of many communities and service industries, especially in the tourism sector.

This has been due to the unmanaged and uncontrolled exploitation of near shore waters which has compromised the very assets that attract anglers to Scotland's coasts and seas - **quality stocks of fish.**

Scotland was once a major sea angling centre based on the quality of its stocks; it could be so again if they were to be regenerated and reinvigorated.

Recovery and Regeneration

Worldwide evidence has shown that areas protected from destructive practices will provide a safe haven for juvenile fish stocks and will also allow the habitats, benthic communities and fauna to recover.

There is talk of achieving this through conservation area initiatives - European Marine Sites, Marine Nature Reserves, Marine Protected Areas, NIMAS, NTZs etc.

These are long-term solutions with a high legislative content and require strong political willpower !

As the kind of management needed to produce an angling 'product' aligns well with the long term conservation needs of most species - to facilitate that, SSACN propose the **Angling Regeneration Centres (ARCs).**

Angling Regeneration Centres (ARCs)

An ARC may be considered as being a specific area where the focus is on the development of sea angling and the regeneration of stocks through conservation and education.

Education and Communication will be at the core of Angling Regeneration Centres.

The designation of an ARC needs to be flexible eg: it could consist of several areas within a coastal feature such as a Firth, or it could encompass the entire feature itself. It could also be part of a bigger MPA.

Whichever model is used, it is essential that they be in areas suited to recreational and leisure activities.

The basic pre-requisites of a potential ARC are :

- FISH
- Background of angling activity
- A basic infrastructure on which to build
- Local business and political commitment
- Regional / National political support

Strategically placed ARCs could provide protection for either specific species of fish under threat and/or provide an opportunity for broader biodiversity regeneration.

The following regions are used extensively for sea angling and certain areas and/or species within them may benefit if one or more ARCs were to be created in the region.

1. Solway – tope, flatfish, rays and bass
2. Loch Etive and Sunart – spurdog, skate and rays
3. Clyde – all species recovery programme
4. Moray Firth – all species recovery programme

Benefits of an ARC

- Minimise the need for species by species legislation
- Benefit all species and habitat within an ARC
- Protect and promote inshore marine biodiversity.
- Promote "Best Value" use of a natural resources
- Create new business / tourism opportunities
- Increase public awareness and knowledge of the inshore marine environment.
- Increase the number and diversity of people taking part in the sport.
- Provide a platform for the further development of other marine recreational / service activities.
- **Put Scotland back on the sea angling map**

Demonstration / Research MPAs.

These MPAs are of particular interest, as one (or more) could be created to pilot the ARC concept.

ARCS can only be achieved if all parties, inc. Local and Regional Government, sea angling clubs, voluntary bodies, commercial fishermen etc, work in partnership.

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**

Postcode **PA2 9ED** Phone **01561 361 960** Email **contact@ssacn.org**

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**