

Respondent Information Form

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://www.gov.scot/privacy/>

What is your name?

Alan Wells

Are you responding as an individual or an organisation?

Only choose “organisation” if you are submitting a response on behalf of an organisation rather than your own individual views.

- ☐ Individual
- ☒ Organisation

What is your organisation?

Fisheries Management Scotland

If responding on behalf of an organisation, please enter the organisation’s name here. If you are responding as an individual you can leave this blank.

Further information about your organisation’s response

Organisations may use this space to provide additional context for their response. This could be information about, for example:

- Any research your organisation undertook to inform the response
- Any engagement with your members or audience undertaken to inform the response

This is optional.

Fisheries Management Scotland is the representative body for Scotland’s District Salmon Fishery Boards, the River Tweed Commission and charitable Rivers and Fisheries Trusts. Our members work to conserve Scotland’s valuable and iconic wild salmon and freshwater fish and fisheries and the aquatic environment on which they depend. FMS are members of the ScotMER diadromous fish receptor group and contributed to work to identify and prioritise evidence gaps associated with the planning and consenting processes for offshore renewable developments. We believe that urgent work is now required to address these evidence gaps and ensure that the growth of offshore wind does not impact already endangered populations of wild Atlantic salmon and sea trout, and critically endangered freshwater pearl mussel, which rely on migratory salmonids to complete their life cycle.

Do you consent to Scottish Government contacting you again in relation to this consultation exercise? (Required)

Yes

No

Email Address

If you would like to be contacted again in future about this consultation please enter your email address here. You will also need to give permission to be contacted in the question above.

Your email address will never be published.

alan@fms.scot

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- ☐ Publish response with name
- ☒ Publish response only (without name)
- ☐ Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. (Required) To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

☐ I consent X

FMS Response to the 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition'

Consultation Questions

Does "up to 40GW of new offshore wind by 2035-2040" demonstrate an appropriate level of ambition for the Scottish Government? Please explain your views.

No. The consultation document makes clear that offshore wind development needs to happen in the right place and be delivered in the right way, particularly when it comes to the environment and other marine users. We are strongly of the view that this does not reflect the current consenting process. Specifically, when it comes to diadromous fish, there is a lack of current information on the use of the marine environment by diadromous fish, and an apparent lack of ambition and resource to study and understand the potential impacts of developments on diadromous fish. This has resulted in these potential impacts being screened out of HRAs and not being addressed through the EIA process appropriately.

Fisheries Management Scotland are members of the ScotMER Diadromous Fish Receptor Group, and contributed to joint work to identify and prioritise evidence gaps associated with the planning and consenting processes for offshore renewable developments. The resulting 'evidence map' was first published in 2019, but very little progress has been made in addressing the identified evidence gaps. Of even greater concern is the fact that the current consenting process does not appear to have driven much meaningful action by developers to address these evidence gaps. The consultation document states that £750m in revenues have been delivered to the public purse in initial option fees, with up to £261m in options fees if INTOG sites are converted to full option agreements. We would like to know what proportion of this funding has been used to properly understand the impact of site-specific and cumulative impacts on our natural environment.

We expected to see an analysis of the total amount of capacity required to meet Scotland's electricity needs, and an honest appraisal of the additional infrastructure (and associated environmental impacts) of getting this energy to where it will subsequently be used. Without this information it is impossible to make an informed decision on whether the ambition set out in the consultation is appropriate or not. Several members of FMS are extremely concerned about this aspect of offshore energy developments, both in terms of the number of cables hitting land in certain locations (e.g. Netherton Hub) and the number of river crossings required. Greater assurance is required that this level of development will not further impact on engendered Atlantic salmon populations. The pace of development and number of applications being brought forward at one time is not consistent with the need to address these issues.

The consultation document does not recognise the significant workload that consultees, such as Fisheries Management Scotland and our members, have to resource in order to properly

assess and comment on the various stages of the consenting process. In our experience, we have yet to review an EIA for an offshore development that did not have serious omissions or inaccuracies with regard to diadromous fish. We regularly have to challenge attempts to scope out potential impacts, on the basis that there is a lack of evidence, despite there also being no evidence of lack of impact. As we set out in our answer to the following question, it is vital that the significant contribution that all consultees make in this process is recognised and supported.

What additional actions do you believe should be taken by the Scottish Government, UK Government and agencies in order to realise the full potential of Scotland's offshore wind sector?

We would like to emphasise that we have no wish to prevent or delay any proposed development unnecessarily and we remain keen to work constructively with the developers, Marine Directorate and NatureScot to identify appropriate monitoring programmes which will allow us to be able to assess the acknowledged risks of proposed developments in a more appropriate manner. There is a clear and urgent need to fund, plan and start strategic research on the movement, abundance, swimming depth, feeding behaviour and impact pathways relevant to diadromous fish. Such research would clearly feed into the potential mitigation measures that might be deemed appropriate, and the conditions under which such mitigation should be enacted. Developers should be required to work together to fund strategic monitoring, in order to allow more certainty for all involved.

The scale of proposed offshore developments and other technical approaches to marine renewables development represents a step-change in the exposure of marine animals of high cultural and economic significance to attendant risks. As highlighted above, understanding of many of these risks is insufficient to support proposals for mitigation even at the stage when substantial developments are being submitted for licensing. The cumulative impact of such proposals, alongside those developments already submitted or likely to follow in the near future is potentially even greater. We believe that more needs to be done to ensure that the best scientific talent is made available to find practicable ways to address the unresolved uncertainties. Fisheries Management Scotland would welcome an opportunity to constructively engage with any such process.

As set out above, we are strongly of the view that District Salmon Fishery Boards have a vital role to play in ensuring that developments proceed in a manner that does not impact wild diadromous fish such as Atlantic salmon and sea trout. As recognised in Scotland's Wild Salmon Strategy, the fisheries management sector is significantly under-resourced, and in the light of the wild salmon crisis, more needs to be done to support DSFBs in responding to offshore developments. Due to the strategic nature of these locations, and the potential for impacts to be spread across a great many rivers, this work has generally been coordinated

through Fisheries Management Scotland. We therefore believe that at least one post should be supported within FMS, with a commitment over the medium term, to support DSFBs in responding to developments, and to allow a suitable level of engagement with developers and their consultants as part of the process. A similar precedent has already been set for our strategic engagement with the aquaculture industry.

We also believe that more resource is needed for NatureScot to respond to offshore wind developments, particularly in relation to diadromous fish. If the Scottish Government is serious about protecting the marine (and associated terrestrial) environment and addressing the nature crisis, NatureScot must be better resourced to undertake this work.

Finally, before any new targets for Offshore Wind are adopted, Scottish Government must ensure that strategic research to understand direct and indirect impacts on diadromous fish is funded in full. Funding for this work should come through a combination of direct funding from Scottish Government, but also from developers as a clear outcome of the consenting process. It is not acceptable to continue to consent developments in the face of the considerable uncertainty around impacts of iconic native Scottish species.