



Awel y Môr Offshore Wind Farm

Category 6: Environmental Statement

Volume 4, Annex 8.2: Commercial Fisheries Consultation Record

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Glossary of terms

TERM	DEFINITION
Beam trawl	A method of bottom trawling with a net that is held open by a beam, which is generally a heavy steel tube supported by steel trawl heads at each end. Tickler chains or chain mats, attached between the beam and the ground rope of the net, are used to disturb fish and crustaceans that rise up and fall back into the attached net.
Bycatch	Catch which is retained and sold but is not the target species for the fishery.
Demersal	Living on or near the seabed.
Demersal trawl	A fishing net used by towing the trawl along or close to the seabed.
Fish stock	Any natural population of fish which is an isolated and self-perpetuating group of the same species.
Fishery	A group of vessel voyages which target the same species or use the same gear.
Fishing ground	An area of water or sea bed targeted by fishing activity.

TERM	DEFINITION
Fleet	A physical group of vessels sharing similar characteristics (e.g. nationality).
Gear type	The method / equipment used for fishing.
ICES statistical rectangles	ICES standardise the division of sea areas to enable statistical analysis of data. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size (approximately 30 x 30 nautical miles). A number of rectangles are amalgamated to create ICES statistical areas.
Landings	Quantitative description of the amount of fish returned to port for sale, in terms of value or weight.
Otter trawl	A net with large rectangular boards (otter boards) which are used to keep the mouth of the trawl net open. Otter boards are made of timber or steel and are positioned in such a way that the hydrodynamic forces, acting on them when the net is towed along the seabed, pushes them outwards and prevents the mouth of the net from closing.
Pelagic	Of or relating to the open sea.
Pelagic trawl	A net used to target fish species in the mid water column.
Quota	A proportion of the Total Allowable Catch for a fish stock.
Scallop dredge	A method to catch scallop using steel dredges with a leading bar fitted with a set of spring loaded, downward pointing teeth. Behind this toothed bar (sword), a mat of steel rings is fitted. A heavy net cover (back) is laced to the frame, sides and after end of the mat to form a bag.

TERM	DEFINITION
Stakeholder	Person or organisation with a specific interest (commercial, professional or personal) in a particular issue.
String	A series of static fishing gear (pots) joined together to form a single deployable line of pots.
Vessel Monitoring System	A system used in commercial fishing to allow environmental and fisheries regulatory organizations to monitor, minimally, the position, time at a position, and course and speed of fishing vessels.

Abbreviations and acronyms

TERM	DEFINITION
AIS	Automatic Identification System
AyM	Awel y Môr Offshore Wind Farm
Cefas	Centre for Environment, Fisheries and Aquaculture Science
DCF	Data Collection Framework
DCO	Development Consent Order
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ES	Environmental Statement
EU	European Union
FLP	Fisheries Liaison Plan
FLO	Fisheries Liaison Officer

TERM	DEFINITION
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
GIS	Geographic Information System
ICES	International Council for the Exploration of the Sea
IoM	Isle of Man
IVMS	Inshore Vessel Monitoring System
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Projects
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
UK	United Kingdom
UKFEN	UK Fisheries Economic Network
VMS	Vessel Monitoring System
WFA	Welsh Fishermen's Association
WNMP	Welsh National Marine Plan

Units

UNIT	DEFINITION
GBP	British pound sterling

UNIT	DEFINITION
hp	Horsepower
km	Kilometres
knots	Nautical mile per hour
kW	Kilowatts
m	Metres
NM	Nautical Mile
t	Tonne

1 Consultation Record

- 1 This Annex describes the outcomes of formal and informal consultation undertaken with stakeholders in relation to commercial fisheries.
- 2 The Applicant submitted a Scoping Report and request for a Scoping Opinion in March 2020. A Scoping Opinion was received in July 2020. The Scoping Report set out the proposed commercial fisheries assessment methodologies, an outline of the baseline data collected to date and proposed, and the scope of the impact assessment. Table 1 sets out the comments received in Section 4.7 of the PINS Scoping Opinion and how these have been addressed in the ES.
- 3 The Applicant published a Preliminary Environmental Information Report (PEIR) and commenced formal statutory consultation under Section 42 of the Planning Act 2008, which ran from August to October 2021. The PEIR was published to support formal consultation and provided preliminary information on the commercial fisheries baseline and impact assessment.
- 4 Table 1 sets out the comments received during Section 42 consultation and how these have been addressed in the ES.
- 5 Informal engagement has been ongoing with a number of stakeholders in relation to commercial fisheries. A summary of the informal engagement undertaken between September 2020 up to and including February 2022 is also outlined in Table 1.

Table 1: Summary of consultation relating to commercial fisheries.

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION WHERE COMMENT ADDRESSED
July 2020 PINS Scoping Opinion	<p>Applicant proposed to scope out impact 'Additional steaming to other fishing ground during construction, operation and decommissioning'.</p> <p>PINS do not agree to scope this matter out and requests that the assessment considers this impact.</p>	<p>The impact assessment in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10, 8.11 and 8.12 includes an assessment of the additional steaming impact.</p>
July 2020 PINS Scoping Opinion	<p>Applicant proposed to scope out 'Impacts to fishing activity from increased vessel traffic associated with construction, operation and decommissioning activities and works'.</p> <p>PINS do not agree to scope this matter out and requests that the assessment considers this impact.</p>	<p>The impact assessment in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10, 8.11 and 8.12 includes an assessment of impacts associated with increased vessel traffic.</p>
July 2020 PINS Scoping Opinion	<p>Shellfish Protected Waters.</p> <p>PINS states that the Environmental Statement should describe the precise location of the shellfish water protected areas and</p>	<p>Shellfish Protected Waters in coastal sites at Llandudno and Conwy do not overlap AyM (see Volume 4, Annex</p>

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	assessment should consider effects on these areas and resultant effects on the commercial shellfish trade.	3.1: Water Framework Directive Assessment (application ref: 6.4.3.1)).
September 2020 Commercial fisheries stakeholder group meeting	<p>A project update was provided to the stakeholder group. Respondents raised the following key concerns:</p> <ul style="list-style-type: none"> • Underwater noise and effects of fish resources; • Potential for extension of the Traffic Separation Scheme north of AyM; • Long term effects from construction and operation; and • Cumulative effects from other projects. 	<p>Underwater noise and potential impacts to fish and shellfish receptors are assessed in Volume 2, Chapter 6 (application ref: 6.2.6). The impact to commercial resources is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10, 8.11 and 8.12.</p> <p>The requirement for a Traffic Separation Scheme is considered in Volume 2, Chapter 9 (application ref: 6.2.9).</p>

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		<p>Impacts have been assessed throughout the lifetime of the project in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10, 8.11 and 8.12.</p> <p>Cumulative effects have been assessed and presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.13.</p>
<p>December 2020 Commercial fisheries stakeholder group meeting</p>	<p>A project update was provided to the stakeholder group. Respondents raised the following points:</p> <ul style="list-style-type: none"> • Use of rock protection for cables; • Effects of noise and vibration during operational phase; and • Effects on existing wrecks within the array site. 	<p>The maximum design scenario, including assumptions related to rock protection, is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Table 9.</p> <p>Potential impacts to fish and shellfish receptors due to</p>

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		<p>underwater noise and vibration are assessed in Volume 2, Chapter 6 (application ref: 6.2.6). The impact to commercial resources is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10, 8.11 and 8.12.</p> <p>Wrecks are protected by Archaeological Exclusion Zones (AEZs), that vary in size according to the sensitivity of the wreck (see Volume 2, Chapter 11: Offshore Archaeology and Cultural Heritage (application ref: 6.2.11)).</p>
March – April 2021	Individual interviews gathered information on commercial fishing activity, trends and operational patterns.	The commercial fisheries activity is presented in

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Individual stakeholder meetings		existing environment Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).
April 2021 Commercial fisheries stakeholder group meeting	A project update was provided to the stakeholder group and opportunity given to discuss the Draft Fisheries Liaison Plan (FLP).	The Applicant is committed to development of a FLP (application ref: 8.5) as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.9.
October 2021 Commercial fisheries stakeholder group meeting	A project update was provided to the stakeholder group and opportunity given to discuss the development of a Fisheries Cooperation Strategy. Specific aspects of the PEIR were also discussed.	The points raised during the meeting in relation to the PEIR mirror those received in Section 42 Consultation responses, which are addressed in subsequent entries in this table.

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<p>October 2021 Section 42 Consultation Welsh Fishermen's Association - Cymdeithas Pysgotwyr Cymru (WFA-CPC)</p>	<p>WFA-CPC expressed concerns with the assessments in the PEIR due to a lack of information on fishing activity by vessels ≤15m length in the array area. WFA-CPC make several points relating to Vessel Monitoring System (VMS) data as follows:</p> <ul style="list-style-type: none"> • VMS is available for vessels ≤12m length; • The PEIR only presents VMS data from 2017, but VMS was mandatory for all EU vessels ≥12m length since 2012; • While it is acknowledged that there is no statutory location data on most 12m and under vessels, due to current VMS rules, the National Policy Statement EN-3 says "Robust baseline data should have been collected and studies conducted as part of the assessment". This missing vessel location information is of serious concern and it would have been expected that the developer would have attempted to complete this data set as part of the assessment. The majority, approximately 90%, of the Welsh fleet are vessels 12m and under in length. This obvious information gap makes all the impact pathway assessment conclusions unreliable throughout Chapter 8 	<p>Commercial fisheries activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS data available to the Applicant does not include vessels <15m length. VMS data sourced from MMO</p>

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	<p>with respect to the impacts on commercial fisheries from all aspects of the development.</p> <p>WFA-CPC request that:</p> <ul style="list-style-type: none"> • VMS data for all size classes should be used, going back through the reference period; and • The developer should formally engage 12m and under vessels with fishers to map their activity based on their evidence of operation. 	<p>displays the value of catches by different gear types and covers UK registered vessels $\geq 15\text{m}$ length.</p> <p>VMS data from 2017 was presented at PEIR as it represented the most recent data made publicly available by the MMO at the time of PEIR publication. Data for 2018/19 is now available and has been presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p>

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		<p>Fisheries landings statistics sourced from the MMO include landings made by vessels of both under and over 10m length. Limitations associated with data sources are clearly identified in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.4.5 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within the AyM area; findings have</p>

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		<p>been incorporated into the description of existing fishing activity presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7, and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). The Consultation Report (application ref: 5.1) provides a detailed account of all consultation undertaken during the AyM project evolution, including consultation with the commercial and recreational charter fishing interests.</p>
October 2021	WFA-CPC state that aquaculture is not mentioned once in either Volume 2, Chapter 8 or Volume 4, Annex 8.1 of the PEIR.	The commercial fisheries section of the AyM Scoping

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<p>Section 42 Consultation WFA-CPC</p>	<p>This is surprising as there are some very large Welsh aquaculture developments close to the proposed site that rely on mussel seed from the wider Liverpool Bay area. There are also proposals for large areas of integrated multi trophic aquaculture development close to the proposed AyM site. The species and the sector should be considered fully within the PEIR and full EIA.</p>	<p>Report noted that commercial aquaculture in Wales has traditionally focused on the managed cultivation of shellfish, principally blue mussels. While the Welsh National Marine Plan identifies potential for the future development of additional aquaculture production. Whilst it is noted that shellfish farming is undertaken within the Menai Strait, and that there exist initial proposals for the development of three shellfish cultivation sites off the North Wales coastline, no existing or potential development locations were</p>

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		<p>identified within AyM boundaries.</p> <p>Potential impacts on Shellfish Protected Waters are considered in Volume 4, Annex 3.1: Water Framework Directive Assessment (application ref: 6.4.3.1).</p> <p>Potential impacts on shellfish species are considered in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref 6.2.6).</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that considering the possibility of Round 4 wind farms in waters off the coast of north Wales within the Crown Estate’s Irish Sea bidding area, it would be more appropriate to take a zonal approach to the environmental assessment of fish and shellfish as a receptor and fisheries as a sector, rather than piecemeal, one wind farm at a time.</p>	<p>The assessment of cumulative effects is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.13 and undertaken in line with the approach set out in Volume</p>

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	<p>While Round 4 developments have been acknowledged in terms of the cumulative impact assessment to fishers, the cumulative effects from displacement and impacts on essential life stage habitats from multiple developments will be significant and should properly be acknowledged by taking a zonal approach to assessment.</p>	<p>1, Chapter 3: EIA Methodology (application ref: 6.1.3) and has taken into account all available information on proposed developments in line with relevant PINS guidance (Advice Note 17).</p> <p>The spatial scale at which cumulative effects have been assessed for commercial fisheries are influenced by the operating range of relevant fishing fleets.</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the PEIR uses unsound, partial information on vessel activity from a pilot project called FishMap Mon and from the WNMP. WFA-CPC request that these evidence sources be removed.</p>	<p>Commercial fisheries activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries</p>

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	<p>WFA-CPC state that the FishMap Mon Project was a pilot that was never progressed further due to issues with its methodology for calculating fishing intensity. The fishing location information was a snapshot in time, it is not representative of the fishing activity, only some Welsh boats from the Anglesey area were included and there is no seasonal variation. Some fishers overestimated maps of their historic fishing activity areas while others significantly underestimated. This data set should be removed from the PEIR Report and not relied upon.</p> <p>Regarding the WNMP data, WFA-CPC state that it is not good enough to rely on synthesised data for vessel activity location without understanding how it has been treated or modelled or what it is relative to. Does it include the majority of the 12m and under Welsh inshore fleet? This data set should be removed from the PEIR Report and not relied upon.</p>	<p>Technical Report (application ref: 6.4.8.1).</p> <p>Reference to data sourced from FishMap Môn and the WNMP has been retained in the ES. Limitations associated with these data sources are fully described in Annex 8.1, and the individual data sources compiled to prepare WNMP mapping are cited. The data are used to indicate areas of likely fishing activity, rather than suggest areas of lesser activity and are used alongside other baseline data sources and consultation outputs to</p>

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		<p>inform characterisation of the existing environment.</p> <p>The baseline characterisation is therefore considered to use all available data, and is in accordance with best practice methods of data collection.</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the PEIR chapter quotes the WNMP as an evidence source that recognises much of Wales' fishing fleet activity is often localised and dependent upon a particular area, habitat and species, however, then contradicts this reasonably accurate summary by saying the fleet has a wide operational range that is not limited to the Awel-y-Mor survey area. This may have some degree of truth for large scallop dredge vessels, but this description does not characterise the smaller indigenous under 12m Welsh vessels prosecuting dredge, net, pot and line fisheries, which are local and limited in range.</p>	<p>Reference is made to fleet operational range in the impact assessment presented in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10 to 8.13. The WNMP is cited in Volume 2, Chapter 8, paragraph 12, but the assessment seeks to also reflect the data gathered to characterise</p>

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		the existing environment and the outcomes of consultation; the consultation and impact assessment observes that fleet operational ranges are not limited solely to fishing grounds within AyM.
October 2021 Section 42 Consultation WFA-CPC	WFA-CPC state that scalloping is seasonal within the Irish Sea. Within the array area whelk potters move pots from offshore ground to allow scallopers to fish in winter. Those grounds will not be available for scallopers or whelkers to fish during construction, potentially pushing both fleets into the same areas and leading to gear conflict, with potential loss of gear, reduced catch and crew safety.	The seasonality of the scallop dredge fishery is acknowledged and described in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Potential for exclusion and displacement impacts during construction are assessed in Volume 2,

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		<p>Chapter 8 (application ref: 6.2.8), Section 8.10.</p> <p>The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94.</p>
October 2021	WFA-CPC state that the PEIR chapter does not mention demersal trawling (beam or stern) as a category, even though Appendix 8.1 mentions trawling as an activity repeatedly,	Volume 2, Chapter 8 (application ref: 6.2.8) presents a summary of the

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Section 42 Consultation WFA-CPC	whether for rays, flat fish or demersal species. This gap needs addressing throughout the chapter.	extended baseline description presented in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). The Technical Report identifies (e.g., Figure 3-24) very limited trawling activity in the Study Area, and consultation has not identified trawling activity within AyM. Trawling activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.5, but based on limited activity, is not further considered in impact assessment.
October 2021	WFA-CPC state that where the PEIR chapter makes reference to informal engagement, informal engagement with fishermen	Consultation in relation to commercial fisheries has

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<p>Section 42 Consultation WFA-CPC</p>	<p>is not good enough. There has been no formal engagement according to the report. Table 3 outlines some informal stakeholder meetings with limited stakeholders, how many were at each meeting? There is no consideration or consultation of itinerant visiting vessels from Wales or further. There needs to be some form of formal engagement with all fishermen concerned for there to be any confidence in the assessments produced.</p>	<p>involved both formal (prescribed by the planning process) and informal (not prescribed by the planning process) stakeholder engagement. All known fisheries stakeholders (including all stakeholders identified by the Fisheries Liaison Officer) have been invited to formally engage during Scoping and Section 42 (PEIR) consultation, and to informally engage via working group meetings and individual stakeholder interviews. Extensive consultation has been undertaken to characterize the existing environment and understand the</p>

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		<p>concerns of fishermen and is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.3 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the PEIR chapter mentions 25% of the EU quota value of catch being returned to UK fleets over 5 years. The first 15% has been returned with Wales receiving considerable uplift in a variety of quota species, it is expected that Welsh vessels will fully exploit this new opportunity, to catch quota species in waters off the coast of north Wales including within the proposed area of the Awel-y-Mor site. The existence of the new wind farm may impact this new opportunity before it is realised, while it is acknowledged that fishing will resume during operation, this is unlikely to include mobile gears due to the proximity to pylons and cabling routes. There must be proper consideration of this new resource within the baseline for assessment, potentially new boats or existing boats, re-</p>	<p>The description of the likely evolution of the commercial fisheries baseline has been updated in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.6 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1) and reflects the latest and projected outcomes of the Brexit process.</p>

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	<p>geared, will want to access this resource but the presence of the array will potentially prevent this and will also influence the Fishermen’s Cooperation Strategy compensation modelling.</p>	
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that it is unlikely that whelk potting can resume in the same operational way it did after the wind farm is constructed. Currently strings of whelk pots between 70 and 100 pots are normally laid, this will not be possible within the wind farms unless they are regimented along certain lines and away from pylons. This is not how fishing is carried out, tide, swell, weather, topography, substrate will determine where is best to fish rather than turbines which will seriously disrupt fishing practices and will force fishermen to re-configure fishing gear, costing more money and take longer to fish the same number of pots, or having to adjust to fishing less pots over the usual soak period with potentially less productivity.</p>	<p>The potential for reduced access in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1. It is assumed that potting activity can resume within the AyM array area during the operation and maintenance phase; which is supported by experience in the UK where whelk potting in particular has resumed within offshore windfarm arrays.</p> <p>As identified in consultation reported in Annex 8.1:</p>

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		Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.
October 2021 Section 42 Consultation WFA-CPC	WFA-CPC state that it is likely scallop dredging and other mobile gear fishing within the proposed Awel-y-Mor area will not be able to continue fishing after construction due to the operation of the gear (turning), proximity of pylons and potential gear snagging conflict (cables). These mobile gear activities will in all likelihood be forced further offshore. This gives rise to health and safety considerations for smaller vessels and will cause displacement of effort. More vessels will be competing for less fish in smaller areas offshore that are environmentally less understood resulting in using more fuel not less and inadvertently creating more pressure on limited areas	The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that

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	with unknown consequences for habitats and fish/shellfish species.	deployment of types of mobile gear within the array is unlikely) during the operation and maintenance phase.
October 2021 Section 42 Consultation WFA-CPC	WFA-CPC state that during construction, potting boats could be forced out of their traditional fishing grounds within the proposed Awel-y-Mor site into traditional scallop grounds further offshore. If this happens then scallop dredges will come into conflict with fleets of pots, causing inevitable financial loss and hardship to fishermen exceeding a medium impact as assessed.	Potential for exclusion and displacement impacts during construction are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10. The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and are committed to developing mitigation that will address

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		exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 82 and 93.
	<p>WFA-CPC state that the PEIR makes the presumption that all fishing including mobile fishing will resume after construction within the proposed Awel-y-Mor array area. What is the experience from Gwynt y Môr (as stated earlier), does mobile or static gear fishing occur there now and to what extent? Mobile fishing is unlikely to resume during operational phase of Awel-y-Mor due to pylons, exclusion areas, array layout, export cable corridors and intersections. More evidence needs to be provided to support the presumption that mobile gear fishing will resume, how much, to what extent etc. in our opinion this should be considered as a direct loss of fishing grounds.</p>	<p>The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that trawling within the array is unlikely) during the</p>

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		<p>operation and maintenance phase.</p> <p>It is assumed that potting activity can resume within the AyM array area during the operation and maintenance phase. As identified in consultation reported in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.</p>
October 2021	WFA-CPC ask how do you evidence that the majority of netting vessels are 10m and under?	Landings data sourced from the MMO (see Volume 2, Chapter 8 (application ref:

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<p>Section 42 Consultation WFA-CPC</p>		<p>6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)) indicates that all landings from drift and fixed nets in the Study Area were made by vessels ≤10m length.</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the only reason the PEIR concludes that fleets targeting the Awel-y-Mor area are typically larger is due to an over reliance on VMS data on 15m and over fishing vessels. This cannot be confirmed or relied upon as the report does not have 15m - 12m VMS data nor has it attempted to gather under 12m vessel activity data. This assumption is unsound and not supported by evidence. This then makes all subsequent conclusions on impact pathways unsound and unsupported by evidence.</p>	<p>Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1) describe fishing activity in the AyM area. It is recognized that vessels of a variety of lengths fish in the area.</p>

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		<p>All available baseline data sources have been collected and analysed, which include landings data sourced from the MMO that records landings made by vessels both under and over 10m length.</p> <p>Comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within AyM.</p>
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the PEIR has categorised the dredge fleet as low-medium value, this may be true for large non-Welsh boats relative to other areas that are further offshore and accessible but in terms of local boats and in periods of prolonged adverse westerly winter weather, this area has a</p>	<p>The dredge fishery is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex</p>

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	<p>high value. Data from the Welsh Governments environmental assessment reports should inform.</p> <p>WFA-CPC state that there has been inshore VMS on all vessels prosecuting the Welsh scallop fishery since 2012. Welsh Government produce reports each year showing heat maps of scallop dredge activity to inform their environmental assessment process before the fishery opens. This data set is missing.</p>	<p>8.1: Commercial Fisheries Technical Report.</p> <p>Landings data sourced from the MMO for all vessel lengths indicates very limited dredge activity by Welsh vessels in the Study Area. Stakeholder engagement has indicated that a single vessel dredges routinely within the AyM array area, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.1.</p> <p>Further data regarding scallop dredge activity in the Study Area, including inshore VMS (iVMS) data, CatchApp data and heat maps, which is not yet</p>

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		publicly available, has been requested from the Welsh Government.
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that the PEIR suggests mitigation to reduce the impact magnitude of potting from medium adverse to minor adverse. It is unclear how there can be coexistence in areas potting has been excluded from? The report talks about an FLP exploring yet undetermined mitigation measures with the fleet. This should remain as medium adverse and the mitigation options explored fully at EIA. It is not appropriate to retire the issue now without the agreed and approved (by fishermen) detail to support the mitigation.</p>	<p>Potential for exclusion and displacement impacts during construction are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.</p> <p>The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement</p>

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		<p>effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94.</p> <p>A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore and agree mitigation at an individual vessel level. The EIA assesses impacts at a fleet level, rather than for individual vessels.</p>
<p>October 2021 Section 42 Consultation</p>	<p>WFA-CPC state that there is no information to substantiate the netting impact assessment conclusions, this cannot be accepted without evidence.</p>	<p>The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8),</p>

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WFA-CPC		Section 8.10 to Volume 2, Chapter 8, Section 8.12 are supported by the sensitivity and magnitude justifications presented in the same sections.
October 2021 Section 42 Consultation WFA-CPC	WFA-CPC state that due to local and seasonal value of scallop fishery and the lack of evidence on 15m and under vessels this impact assessment conclusion cannot be accepted.	The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10 to Volume 2, Chapter 8, Section 8.12 are supported by the sensitivity and magnitude justifications presented in the same sections.
October 2021 Section 42 Consultation	WFA-CPC state that as previously highlighted the potting mitigation is undetermined so cannot be deemed appropriate. Relying on a presumption that has not been substantiated.	The Applicant acknowledges the potential for a significant effect in

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WFA-CPC	How would you ensure active pots are set in a manner that avoids gear interaction?	<p>relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94, and paragraph 101 regarding potential means to minimise gear conflict.</p> <p>A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore</p>

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		and agree mitigation at an individual vessel level.
<p>October 2021 Section 42 Consultation WFA-CPC</p>	<p>WFA-CPC state that both the exclusion and the displacement effects to potters, netters, trawlers, liners and dredgers from the Awel-y-Mor site is not reliable as it is based on incomplete evidence, the report does not include impacts from, or to, the majority of the Welsh fleet who are 12m and under vessels.</p>	<p>Welsh fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). These descriptions have been informed by analysis of all publicly available data and engagement with Welsh fishermen.</p> <p>The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10 to Section 8.12 are supported by the</p>

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		sensitivity and magnitude justifications presented in the same sections.
<p>October 2021 Section 42 Consultation Isle of Man (IoM) Government</p>	<p>IoM Government state that there are only 3 references to the Isle of Man in the Preliminary Environmental Information Report Volume 2, Chapter 8: Commercial Fisheries, and only 2 in the baseline report. This is surprising considering the fisheries study area specifically includes Manx Territorial waters pg. 25, and that Manx-registered fishing vessels operate within the wider Irish Sea area.</p> <p>Regardless of eventual conclusions, there is no reference to previous input on this topic by the Isle of Man Government, and so it is difficult to determine whether limited inclusion relates to actual lack of consideration or exclusion via pre-assessment in another process. Either way, clarification would be helpful.</p> <p>The Committee therefore seeks reassurance that Manx fishing interests have been fully considered, from both territorial sea impacts and within the wider Irish Sea, and in reference to the points noted below and previously.</p>	<p>Isle of Man fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. Isle of Man data has been</p>

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		<p>incorporated into MMO UK databases since 2011. Commercial fishing vessels that are registered to the IoM are required to hold both IoM and UK fishing licences. The MMO iFISH database therefore provides commercial landing statistics for all vessels registered to UK administrations and crown dependencies.</p>
<p>October 2021 Section 42 Consultation IoM Government</p>	<p>IoM Government requests confirmation that Manx vessels have been appropriately considered within the baseline data and assessment. Specifically;</p> <p>Have Manx-registered vessels been considered within the data set; do they not appear due to lack of fishing activity, or are they not included for some other reason?</p> <p>How has the assessment considered vessels <15m, when only a proportion of active vessels are above this size (noting that all</p>	<p>As per the response immediately above, Isle of Man fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report</p>

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	<p>Manx scallop vessels, regardless of size, carry and operate VMS equipment);</p> <p>Noting the data source (MMO VMS registered to the UK); have Manx vessels (i.e. registered in the Isle of Man, rather than UK-registered), been considered within the assessment baseline; and,</p> <p>Why only a single year (2017) has been considered appropriate for a commercial fisheries baseline, and the justification for that particular year.</p>	<p>(application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey.</p> <p>VMS data from 2017 was presented at PEIR as it represented the most recent data made publicly available by the MMO at the time of PEIR publication. Data for 2018/19 is now available and has been presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex</p>

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		8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).
October 2021 Section 42 Consultation IoM Government	IoM Government state that in determining commercial fisheries receptors, there is no reference to engagement with the Manx Fish Producers' Organisation (as previously recommended), and it is acknowledged that baseline data relates to VMS data for all vessels 15m.	The Manx Fish Producers' Organisation is included on the AyM fisheries stakeholder distribution list and was invited to attend group meetings and respond to request for individual interview.
October 2021 Section 42 Consultation IoM Government	IoM Government state that any displacement of fishing activity to 'alternate fishing grounds' is likely to disproportionately impact in Manx waters. It is not clear that this has been considered in this assessment, and it is particularly relevant in the context of current strategic planning for Manx scallop fisheries management; https://consult.gov.im/environment-food-and-agriculture/consult-on-the-isle-of-man-king-scallop-fishery/	The potential for displacement is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10 to 8.12. Potential displacement of scallop dredge activity is assessed in the context of

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	<p>IoM Government requests further assessment of scallop fishery displacement effects in the context of Manx waters, and to include further consultation with Department of Environment, Food and Agriculture Fisheries Division and the Isle of Man Scallop Management Board.</p>	<p>the wider Irish Sea, noting that scallop grounds extend across much of the Irish Sea. AyM has not been assessed as causing significant displacement of the scallop dredge fishery given key grounds are outside of the AyM area.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of the WFA-CPC – Consultee ref: MOP_024_11102021</p>	<p>States robust baseline data has not been presented. The National Policy Statement (NPS) EN-3 requires that “Robust baseline data should have been collected and studies conducted as part of the assessment.” (see Table 1 of PEIR Volume 2, Chapter 8). It is clear to anyone with knowledge of the area and the data used to produce these reports that this is not the case, both regarding information about the fish caught in the area, and the activity of fishing vessels.</p>	<p>All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Limitations associated with</p>

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		<p>each data source are clearly described.</p> <p>Further to this, comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within AyM.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of the WFA-CPC –</p>	<p>States that the data on commercial fishery removals are all taken from sources of information that have limited relevance to the actual fishing activity in this area. This is because most of the fleet working in this area are smaller vessels (typically under 10m – a point that the authors make themselves in sections 3.3.1 and 3.3.3 of the baseline report but not in the Volume 2 report) and the data sources cited are all for vessels larger than this.</p>	<p>Fisheries landings statistics sourced from the MMO include landings made by vessels of both under and over 10m length.</p> <p>Comprehensive engagement in the form of fisheries group meetings and individual interviews (see Annex 8.1: Commercial</p>

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<p>Consultee ref: MOP_024_11102021</p>		<p>Fisheries Technical Report (application ref: 6.4.8.1)) with fishermen has been undertaken to understand fishing activity within AyM.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of the WFA-CPC – Consultee ref: MOP_024_11102021</p>	<p>States that the spatial data sources that are cited in the report all relate to larger vessels than those that typically work in this area and hence any conclusions that have been drawn from this information will not be robust.</p>	<p>All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Limitations associated with each data source are clearly described.</p> <p>Fisheries landings statistics sourced from the MMO include landings made be</p>

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		<p>vessels of both under and over 10m length.</p> <p>Comprehensive engagement in the form of fisheries group meetings and individual interviews (see Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)) with fishermen has been undertaken to understand fishing activity within AyM.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of</p>	<p>States that they have participated in many meetings with windfarm operators over the past few years, including some of those listed in the PEIR report that are specific to this project. A recurring theme of these discussions is that the fishers in the area have been reporting changes in fish abundance and diversity in this local area for many years, since the construction of the North Hoyle, Rhyl Flats and Gwynt y Môr windfarms that have impacted their livelihoods and that have not been</p>	<p>Trends in commercial landings are described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p>

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the WFA-CPC – Consultee ref: MOP_024_11102021	investigated. This issue has not been studied either for those projects or as part of this assessment.	<p>In interviews with fishermen, a specific question was asked around observed trends in catches. Observed trends over the time series vary by species (i.e., landings of some have declined, some and increased, some have fluctuated and not demonstrated a consistent trend).</p> <p>Trends are understood to be influenced by a number of factors, as described in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p>
October 2021	States there are quite a lot of unexplained inconsistencies between reports. Compare for instance the weight of landed	All available baseline data sources have been

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<p>Section 42 Consultation</p> <p>Fisherman, shellfish farmer and North Wales representative of the WFA-CPC –</p> <p>Consultee ref: MOP_024_11102021</p>	<p>catch in Figure 2 of Volume 2 Chapter 8 with values in Figures 3-27 & 3-30 of Volume 4 Chapter 8.1, and also the values of catches in Figure 3 of the former with Figure 3-6 of the latter. It is not at all clear to them that like is being compared with like, nor that Welsh vessels have been included in the Volume 2 data.</p>	<p>collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p> <p>VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey.</p> <p>Reports of inconsistencies have been checked and the data is not inconsistent. For example, Figure 2 in</p>

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		<p>Volume 2, Chapter 8 (application ref: 6.2.8), presents landings by all UK vessels, whereas Figure 3-27 in Annex 8.1 presents landings for only Welsh vessels and Figure 3-30 presents landings for UK vessels excluding Welsh vessels. The data presented are all drawn from the same MMO source.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of the WFA-CPC –</p>	<p>States that as well as being unable to find any information from surveys conducted for other windfarms, they were surprised to find that no data are presented from the scientific cruises carried out on a regular basis in the area by the RV Prince Madog and previous Research Vessels from the University of Bangor.</p>	<p>All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8, Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).</p>

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<p>Consultee ref: MOP_024_11102021</p>		<p>These include Bangor University reports, as referenced in Annex 8.1.</p>
<p>October 2021 Section 42 Consultation Fisherman, shellfish farmer and North Wales representative of the WFA-CPC – Consultee ref: MOP_024_11102021</p>	<p>States that they notice the report on angling refers to the impacts of piling noise on fish catches, but that the commercial fishing report does not. States they don't know why this is the case, because both commercial fishers and anglers have experienced impacts of windfarm piling at a considerable distance. States that there are a number of tables in the underwater noise report (Volume 4 Annex 6.2, Tables 26 & 27) which show that sublethal impacts on fish might occur many kilometres away from the site (Figures 12 & 15 of that report illustrate this). Some explanation of the implications of this should be given in both the commercial fishing and angling reports.</p>	<p>The potential for noise disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10 to 8.12. The assessment does not duplicate but refers to the relevant outcomes of the Fish and Shellfish Ecology assessment, as presented in full in Volume 2, Chapter 6 of this ES (application ref: 6.2.6).</p>

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<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Queries how is the HIGH magnitude suggested to be greater than 8 years for a substantial loss of target fish or shellfish, MEDIUM, less than 8 years, LOW less than 2-3 years, NEGLIGABLE less than one year. What is the rationale behind this? It is ridiculous that for a substantial loss of shellfish or fish to occur this has to continue for more than 8 years suggesting that if there are significant drops in shellfish and fish populations due to construction or operation they have to go on for more than 8 years to be graded high.</p>	<p>Assessment criteria are consistent with those set out in Volume 2, Chapter 3 (application ref: 6.2.3). Criteria are developed in order to support objective assessments. In providing definitions of magnitude for the commercial fisheries assessment, indicative impact durations have been provided. The durations are indicative rather than absolute and have been set within the context of AyM timelines (e.g., medium duration is considered to be less than the lifetime of the project, short-term duration</p>

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		<p>aligns with the duration of project construction).</p> <p>As Volume 2, Chapter 8 (application ref: 6.2.8), Table 6 explains, impact magnitude is not judged based solely on duration, but also on physical extent.</p>
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Regarding assessment of potential displacement of fisheries activity, notes the following PEIR statement, 'Typically larger vessels that can fish elsewhere' then states, yes but they most likely displace to areas inshore and offshore fished by local boats.</p>	<p>The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see paragraphs 83</p>

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		and 94, and paragraph 101 regarding potential means to minimise gear conflict.
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Queries how netting fleet effects are negligible. How can this be, if the fish disappear due to pile driving and operational effects wherever the local netting fleet fishes, they won't be able to catch fish even outside AyM footprint or the cable corridor.</p>	<p>The rationale supporting the assessment outcome is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.1, noting that netting activity is typically focused inshore of the AyM array area.</p> <p>Potential impacts on commercially important species and consequences for fisheries activity are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.5.</p>

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<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Regarding assessment of potential displacement of potting activity during construction, notes the following PEIR statement, 'Encourage co-existence and further mitigate the effect' then queries what does this mean? How can impact magnitude be reduced from Medium?</p> <p>Regarding potential mitigation to address potential displacement of potting activity during construction, notes the following PEIR statement, 'storage of pots on land' and queries will there be payment for lost catches in this gear and payment for land/container rental for storage? Regarding pots being left open, states this is a risk to gear as if gear rolls in weather doors maybe damaged, they would have to bring gear ashore with associated loss of catch and time associated with transporting gear to and from grounds.</p>	<p>A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore and agree mitigation at an individual vessel level.</p> <p>The FLP will explore options including cooperation agreements and associated payments, and seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect, e.g., such that displaced pots are not actively deployed during the period of</p>

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		mitigation (e.g., pots to be left open, or stored on land), or if deployed, they are done so in a manner that avoids or minimises gear interaction.
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Regarding assessment of potential displacement of potting activity during construction, notes the following PEIR statement, 'displacement impact low for potters' and states this is not the case, there are only discrete spaces where different species can be potted for and if gear is displaced there is nowhere for extra gear to be placed. Also in North Wales we are severely restricted as to where we can place gear in the scallop season which runs from November - April when the cable corridor is widely used for winter potting for a variety of species including crab, lobster and whelk. Has this severe restriction on our normal potting operations in winter been taken into account in the PEIR? Large and smaller vessels use this area in the winter and further displacement would mean that gear would have to be brought ashore, restricting winter catches.</p>	<p>The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and</p>

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		94, and paragraph 101 regarding potential means to minimise gear conflict.
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>Regarding assessment of potential displacement of fishing activity during construction states some inshore vessels are not able to relocate from the ECC as this is a winter area and static gear ground is limited due to mobile scallop boats. Queries how statements in the PEIR around ability of vessels to relocate have been qualified.</p>	<p>All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Baseline data and the outcomes of consultation with fishermen indicate that vessels fish various grounds in the region and would not be limited solely to grounds within the ECC.</p>

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<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>States that fishermen are not informed of where cables are exposed in for instance Gwynt y Môr even after surveys so to presume that fishing especially mobile gear can resume in areas with cables is not the case. Increased number of cables and increased numbers of turbines increases the risk of fishing in these areas to fishermen and their boats and crew. Has this fact been quantified in the PEIR?</p>	<p>The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that trawling within the array is unlikely) during the operation and maintenance phase.</p> <p>It is assumed that potting activity can resume within the AyM array area during the operation and</p>

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		<p>maintenance phase. As identified in consultation reported in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.</p>
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>States that the PEIR cannot be considered to be complete if it does not include the cumulative effects of construction and operation of Mona, Morgan and Cobra offshore wind farms which it is obvious will be constructed at the same time as AyM on a far greater scale (Mona and Morgan half the size of Greater London). The cumulative effects of these three other wind farms being built over the same period must be considered. Also the cumulative effects of the operation of these 3 wind farms and AyM and all the other existing</p>	<p>The assessment of cumulative effects is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.13 and undertaken in line with the approach set out in Volume 1, Chapter 3 (application ref: 6.2.3): EIA Methodology.</p>

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	windfarms in the Northern Irish Sea must be considered in the EIA.	The spatial scale at which cumulative effects have been assessed for commercial fisheries are influenced by the operating range of relevant fishing fleets.
October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021	States that the baseline landings data has not considered the landings from the under 10 m vessels as this is obvious from the 35E6 landings data that it is from over 10 m logbook data. The VMS data is only available for over 12 m vessels and not for the under 12 m fleet so the distribution of effort given in the report for the inshore fleet is not representative of the actual fishing that occurs in the study area.	Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1) describe fishing activity in the AyM area. All available baseline data sources have been collected and analysed, which include landings data sourced from the MMO that

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		<p>records landings made by vessels both under and over 10m length. Limitations associated with each source of baseline data are clearly described.</p> <p>Comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within the AyM area.</p>
<p>October 2021 Section 42 Consultation Fisherman</p>	<p>Queries whether the Fisheries Liaison Plan includes the Cable corridor.</p>	<p>The FLP (application ref: 8.5) will be applicable to the AyM array and ECC areas.</p>

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION WHERE COMMENT ADDRESSED
<p>Consultee ref: MOP_028_11102021</p>		
<p>October 2021 Section 42 Consultation Fisherman Consultee ref: MOP_028_11102021</p>	<p>States that impact magnitude is suggested as 8 years or higher to be regarded as high, for loss of target fish or shellfish; this is ridiculous.</p>	<p>Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.5 explains how the magnitude of impact on target species is assessed, noting that it draws on the impact assessment outcomes of the Fish and Shellfish Ecology assessment presented in Volume 2, Chapter 6 (application ref: 6.2.6), as opposed to using the definitions of magnitude otherwise applied in the Commercial Fisheries assessment.</p>

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION WHERE COMMENT ADDRESSED
<p>January 2022</p> <p>Individual stakeholder meeting</p>	<p>A joint meeting was held with stakeholders who provided a response to Section 42 Consultation. Issues raised by stakeholders in their consultation responses, and how they have been addressed within this ES, were discussed. Actions were taken from the meeting and those relevant to the ES were as follows: ES to consider limitations associated with FishMap Môn project and Welsh National Marine Plan spatial fisheries data; ES to confirm landings data coverage of capture activity of vessels of 10m length and under; and, ES to consider potential for future trawling opportunities associated with Brexit.</p>	<p>The points covered in the meeting reflect the content of the previous entries in this table.</p> <p>Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.4.5 discusses baseline data limitations and coverage of vessels of 10m length and under in landings data.</p> <p>Volume 2, Chapter 8, Section 8.7.6 notes potential future trawling opportunities associated with Brexit.</p>
<p>February 2022</p> <p>Commercial fisheries</p>	<p>A project update was provided to the stakeholder group, focused on the Development Consent Order application process.</p>	<p>No additional issues raised beyond those covered in previous entries in this table.</p>

DATE AND CONSULTATION PHASE/ TYPE	CONSULTATION AND KEY ISSUES RAISED	SECTION WHERE COMMENT ADDRESSED
stakeholder group meeting		



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