

Record of a Habitats Regulations Assessment of a project or spatially-specific plan

OGN 200 Form 1B (with structured tables for likely significant effect screening and appropriate assessment)

Document owner: Head of Business for Natural Resource Management

Version History:

Document Version	Date Published	Summary of Changes
2.0	21/10/2024	Following 2023/24 review of HRA OGNs

Next review date: **October 2025**

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OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	RML2610 - CEND112026 Clean Seas Environmental Monitoring Programme
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	21 April 2026
2	Applicant details	Cefas
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A

4	Activity/ies proposed	To sample representative CSEMP sediment stations using day grab, for polycyclic aromatic hydrocarbons (PAHs), trace metal contaminants, sediment particle size analysis (PSA), and benthic fauna. Work is being undertaken to evaluate sediment contamination levels and benthic community abundance at a number of locations around the Welsh coastline. At each site sediment will be sampled (max 5 replicates per site, each approx. 0.1m³). Manta trawl, plastic pump and/or catamaran will be used to sample the surface of the ocean for microplastics (0.1m³) will be collected using a day grab. This work is being undertaken as part of Defra's Clean Seas Environmental Monitoring Programme (CSEMP) for the purposes of OSPAR reporting. Fish sampling will also occur and is detailed in the method statement, however this is not a licensable activity and so is not included in the HRA.
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009
6	Location	Wales inshore and offshore region:



7 Plan or project documents, including any

RML2610 - Application Form
RML2610 - Method Statement 2026
RML2610 - PA2606 Q26021 - DEFRA Clean Seas and Environmental Monitoring Programme
RML2610 - RCAHMW Cefas Survey CEND112026 sediment station
RML2610 - RE_ Cefas Survey CEND112026 navigational safety - MCA Response
RML2610 - Trinity House FW_ Cefas Survey CEND112026 navigational safety

	application documents	RML2610 - CSEMP Welsh Sediment Stations Priority 1 to 8 UPDATED
8	Environmental Statement	N/A
9	Pre-application correspondence	Pre-application advice regarding licensable activities was given and is captured in "RML2610 - PA2606 Q26021 - DEFRA Clean Seas and Environmental Monitoring Programme"
10	NRW team responsible for preparing this HRA report, and lead officer	Marine Licensing Team - Vicky Fisk, Marine Licensing Officer
11	Team or person responsible for approving the plan or project (competent authority role)	As above

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	Yes
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or	No

species for which the European site(s) is/are designated?	
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	Yes

3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	No
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3.2 Likelihood of significant effects (LSE) test

3.2.1 Which European sites might be affected by the plan or project?

(a)	Based on the plan or project specification, or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project	• Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC [UK0013117] – four locations within SAC • West Wales Marine / Gorllewin Cymru Foro SAC [UK0030397] – four locations within SAC • Cardigan Bay / Bae Ceredigion SAC [UK0012712] – 8.3km from closest location • Northern Cardigan Bay / Gogledd Bae Ceredigion SPA [UK9020327] – three locations within SPA • Skomer, Skokholm and the Seas off Pembrokeshire SPA [UK9014051] – 1km distance from closest location • Liverpool Bay / Bae Lerpwl SPA [UK9020294] – 5.3km from closest location
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		Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA [UK9013121] – 11.8km from closest location A sequential approach has been taken for features within a MMMU for this HRA due to the nature of the proposed activities, therefore other sites within the Celtic and Irish Seas MMMU (designated for harbour porpoise) and OSPAR Region III Celtic Seas MMMU (designated for grey seal) have not been listed here. As recommend in the HRA for SACs with Marine Mammal Features Position Statement (PS006), sites within the Irish Sea MMMU designated for bottlenose dolphin have been considered separately.
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature	Relevant conservation objectives	Screening conclusion – ‘SCREEN OUT’, ‘SCREEN IN’ or ‘IN COMB’	Explanation

Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC			
Reefs	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN IN	Two samples are located within this habitat type. As the samples are likely to interact with the designated feature, LSE cannot be ruled out.
Large Shallow inlets and bays	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN IN	Three samples are located within this habitat type. As the samples are likely to interact with the designated feature, LSE cannot be ruled out.
Sandbanks which are slightly covered by seawater at all times	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Estuaries	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Coastal lagoons	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Mudflats and Sandflats	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Atlantic salt meadow	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.

Salicornia and other annuals colonising mud and sand feature	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Submerged or partially submerged sea caves	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected. No samples are planned that interact with known instances of this habitat.
Bottlenose dolphin <i>Tursiops truncatus</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. Due to the small scale of the works, this screening decision can be applied to all SACs within the OSPAR Region III Celtic Seas MMMU.
Otter <i>Lutra lutra</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
West Wales Marine SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. Due to the small scale of the

			works, this screening decision can be applied to all SACs within the Celtic and Irish Seas MMMU.
Cardigan Bay/Bae Ceredigion SAC			
Sandbanks which are slightly covered by sea water all the time	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No impact pathway due to the distance between the closest proposed sample and the site (8.3km).
Reefs	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No impact pathway due to the distance between the closest proposed sample and the site (8.3km).
Submerged or partially submerged sea caves	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No impact pathway due to the distance between the closest proposed sample and the site (8.3km).
Bottlenose dolphin <i>Tursiops truncatus</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Grey seal <i>Halichoerus grypus</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. Due to the small scale of the

			works, this screening decision can be applied to all SACs within the OSPAR Region III Celtic Seas MMMU.
Northern Cardigan Bay / Gogledd Bae Ceredigion SPA			
Red-throated diver <i>Gavia stellata</i>	NRW conservation objectives : conservation-advice-for-northern-cardigan-bay-spa.pdf	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. The works are also planned outside of the wintering season, when the species are most susceptible to disturbance.
Skomer, Skokholm and the seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA			
A346 Chough <i>Pyrrhocorax pyrrhocorax</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
A222 Short-eared owl <i>Asio flammeus</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
A014 Storm petrel <i>Hydrobates pelagicus</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
A183 Lesser black-backed gull <i>Larus fuscus</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.

A013 Manx shearwater <i>Puffinus puffinus</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
A204 Puffin <i>Fratercula arctica</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
SBA Seabird assemblage of international importance including: Razorbill <i>Alca torda</i> Guillemot <i>Uria aalge</i> , Kittiwake <i>Rissa tridactyla</i> Puffin <i>Fratercula arctica</i> Lesser black-backed gull <i>Larus fuscus</i> Manx shearwater <i>Puffinus puffinus</i> Storm petrel <i>Hydrobates pelagicus</i>	Skomer, Skokholm and the Seas off Pembrokeshire SPA	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Liverpool Bay/Bae Lerpwl SPA			
Red-throated diver <i>Gavia stellata</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10

			days on one vessel. The works are also planned outside of the wintering season, when the species are most susceptible to disturbance.
Little gull <i>Hydrocoloeus minutus</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. The works are also planned outside of the wintering season, when the species are most susceptible to disturbance.
Common scoter <i>Melanitta nigra</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel. The works are also planned outside of the wintering season, when the species are most susceptible to disturbance.
Little tern <i>Sternula albifrons</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Common tern <i>Sterna hirundo</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Waterbird assemblage	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Aberdaron Coast and Bardsey Island SPA			

Chough <i>Pyrhocorax pyrrhocorax.</i>	Glannau Aberdaron Plan	SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.
Manx shearwaters <i>Puffinus puffinus.</i>		SCREEN OUT	No conceivable disturbance due to the small scale nature of the works meaning that the total habitat loss is negligible. 0.1m ³ per sample will be collected and up to a maximum of five replicates per site will be collected, taking place over a maximum of 10 days on one vessel.

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'	The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.
(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.
(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN COMB'	The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.

4. Appropriate assessment of the plan or project when considered alone

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
European site name:			
Reefs	Two sampling sites are located within mapped areas of reef habitats within the SAC. Sediment samples of 0.1m ³ will be collected using a day grab and up to five replicates per site will be collected, giving a total of up to 1m ³ of sediment removed that may interact with this habitat type.	The removal of up to 1m³ through sediment sampling does not undermine the conservation objectives to maintain the overall distribution and extent of the reefs feature as this represents a small area of the habitat within the SAC. The sediment sampling will not affect the hydro-morphological and chemical elements necessary for the structure and function of the reefs feature as a limited amount of sediment will be removed and will therefore not impact the hydromorphology of the area or the sediment supply. The abundance, distribution and diversity of species within communities and component habitats will not be negatively impacted due to the small scale nature of this project.	YES
Large shallow inlets and bays	Three sampling sites are located within mapped areas of reef habitats within the SAC. Sediment samples of 0.1m ³ will be collected using a day grab and up to five replicates per site will be collected, giving a total of up to 1m ³ of sediment removed that may interact with this habitat type.	The removal of up to 1m ³ through sediment sampling does not undermine the conservation objectives to maintain the overall distribution and extent of the large shallow inlets and bays feature as this represents a small area of the habitat within the SAC.	YES

		The sediment sampling will not affect the hydro-morphological and chemical elements necessary for the structure and function of the feature as a limited amount of sediment will be removed and will therefore not impact the hydromorphology of the area or the sediment supply. The abundance, distribution and diversity of species within communities and component habitats will not be negatively impacted due to the small scale nature of this project.	
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4.2—Appropriate assessment of the plan or project taking into account additional conditions or restrictions imposed by the competent authority

Table 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions				
European site name:				
European site Feature	Adverse effect(s)	Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO'	Additional imposed mitigation measure(s)	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'

4.3 Concluding the appropriate assessment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.
(b) If there are any 'NO's in the right hand column of Table 4.2	It has not been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of one or more European sites.
(c) Are there are any residual effects of the plan or project (not of mitigation measures) which, though not adverse on their own, could be significant when considered in combination with the effects of other plans or projects?	

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed:	
Name: Vicky Fisk	Position: Marine Licensing Officer
Date: 20 May 2026	
Was this HRA conclusion an escalated decision? YES or NO	NO

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
6	NRW Advisory – 19 May 2026	NRW Advisory agree with the conclusion of this HRA.

9. Appendix - Supporting information

TO: Vicky Fisk – Marine Licensing Team
FROM: Rachael Castle – Marine Area Advice and Management Team
SUBJECT: Habitats Regulations Assessment of CEND112026 Clean Seas
Environmental Monitoring Programme RML2610

Thank you for consulting Marine Area Advice and Management Team on the above. Our comments are as follows:

We agree with the conclusion of the above mentioned HRA, with respect to the marine features of the Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC, West Wales Marine / Gorllewin Cymru Forô SAC, Cardigan Bay / Bae Ceredigion SAC, Northern Cardigan Bay / Gogledd Bae Ceredigion SPA, Skomer, Skokholm and the Seas off Pembrokeshire SPA, Liverpool Bay / Bae Lerpwl SPA, Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA.

We agree that the project has been taken to appropriate assessment and it is established that that the project will not adversely affect the integrity of the above named Natura 2000 sites, due to the temporary nature and scale of the works.

Signed: *R.Castle*

Date: 19/05/2026