

South Coast DMAP

A SUBMISSION FROM REPRESENTATIVE ORGANISATIONS OF IRELAND'S SEAFOOD INDUSTRY
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A Submission

from the Representative Organisations of Ireland's Seafood Industry

to the

Minister for the Environment, Climate and Communications,

As the

Competent Authority for establishing the South Coast DMAP for the

development of offshore renewable energy.

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Introduction

The launch of the *South Coast DMAP¹ Proposal for Offshore Renewable Energy (ORE)* represents a significant shift in marine planning, away from the developer-led approach used for Phase I projects (all of which availed of the transition provisions of the Maritime Area Planning Act 2021), and a first step into a systemic, plan-led, development of Ireland's off-shore wind potential.

Crucially, the policy shift ensures that:

- All future offshore wind development *will take place according to a Plan-Led regime.*
- *The State will determine the appropriate location of all future offshore windfarms/grid infrastructure.*
- *This use of forward spatial planning will take place according to an ecosystem-based approach, in line with the requirements of the National Marine Planning Framework and the Marine Spatial Planning Directive.*

This follows approval by Government and the Oireachtas that all future offshore renewable energy developments in Ireland will take place within sub-national² maritime areas that have been specifically designated for that purpose.

Importantly, it is a recognition that maritime spatial planning (MSP) is the appropriate tool to manage the use of our seas and oceans coherently and to ensure that human activities take place in an efficient, safe, and sustainable way.

It also recognises that adopting a plan-led approach gives effect to a key component of Ireland's first comprehensive maritime spatial plan, the National Marine Planning Framework (NMPF). The NMPF applies to a maritime area of some 495,000km² and sets out how Ireland will use, protect, and enjoy its seas in the years up to 2040. Specifically, the issue of spatial designations for future activity has been a critical consideration in the development of the NMPF.

Noting that a DMAP is a sub-national management plan for a specific area of the sea that can be used to develop *inter alia* multi-activity area plans *or* to promote the use of specific activities, and recognising that, when established, every DMAP will form part of the NMPF and become a binding consideration for marine decision makers, it is imperative that the National Marine Planning Framework is a key consideration when developing DMAPs. This applies not just to the competent authority responsible for the DMAP (the Minister for Environment, Climate and Communications in respect of the South Coast DMAP³), but also to the Minister for Housing, Local Government and Heritage, the Government and both Houses of the Oireachtas all of whom must approve a draft DMAP before it can be declared *established*. Likewise, while undertaking their functions, public bodies, including

¹ Designated Maritime Area Plan

² See NMPF: Appendix D, sub-national planning and spatial designation.

³ Ref: DDES-23-001

the Minister and Department for Agriculture, Food and Marine, and those responsible for issuing authorisations or consents for offshore activities, must comply with the objectives of the NMPF and by extension DMAPs.

Please note: Seafood Industry recommendations are numbered: 1-9 etc with sub-items numbered 2.1, 2.2 etc.

1. **Desirability of Plan-led Development:** The Seafood Industry, recognising the urgent need to develop alternative forms of sustainable energy, welcomes the move from a developer-led to a plan-led approach to the future development of fixed and floating offshore renewable energy (ORE).
2. **Public Participation Statement/Impact assessment:** The Seafood Industry welcomes the publication, as required by section 23 of the Maritime Area Planning Act 2021, of a Public Participation Statement (PPS) in respect of the SE DMAP Proposal and the commitment therein to undertake:
 - Appropriate public engagement.
 - Environmental analysis.
 - Assessment of the potential impacts of ORE on other maritime usages.
- 2.1. **Maritime usage/users:** The Seafood industry consider that the term '*other maritime usage or users*' should be read to mean *inter alia* seafood industry/commercial fisheries and fishers⁴, and the term fish or fishery to mean commercial fish stocks including migratory species and shellfish and any spawning, nursery, or juvenile areas impacted by any development proposal.
- 2.2. **Socio-economic impact assessment:** Contingent on 2.1, the Seafood industry consider that the term '*assessment by the Minister of the potential impacts*' be read to include socio-economic, sustainability, and administrative impact assessment and recommend that the assessment provided for in the PPS should, in the case of seafood/fisheries, consist of an appropriate socio-economic assessment of all potential impacts of the development provided for in the South Coast (or any future) DMAP.
- 2.3. **Environmental Impact Assessment⁵:** The terms '*environmental analysis*' be read to mean Environmental Impact Assessment (EIA) as set out in Directive 2014/52/EU (amending Directive 2011/92/EU) on the assessment of the effects of certain public and private projects on the environment. The Seafood industry note the importance of (i) the scoping procedure to identify issues to be addressed in the EIA report, in particular, the impact on fish stocks including migratory species, shellfish and spawning, nursery, juvenile areas; (ii) the quality control and public consultation mechanisms employed during the completion of the EIA; (iii) the importance of integrating climate change, biodiversity and disaster prevention aspects of the ORE projects provided for in the DMAP.

⁴ The Seafood Industry recognise that other users will regard the term *other maritime usage or users* as referring to their sector/industry.

⁵ **Environmental Impact Assessment Directive** (EIA Directive) means Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.

Building a basis for cooperation: Summary Guide on Seafood/ORE Engagement

The Seafood Industry also notes the publication, on the same date as the South Coast DMAP proposal, of the Summary Guide on Seafood / ORE Engagement in Ireland (the *Summary Guide*). This document, the result of extensive discussion between the seafood industry and ORE developers under the auspices of the Seafood ORE Working Group, chaired by Capt. Robert McCabe, provides Offshore Renewable Energy projects and seafood stakeholders with guidance on how to engage and co-exist in a meaningful and constructive manner throughout the lifecycle of an ORE project.

Recalling that the seafood industry is a vital part of our economy and an established part of the existing culture of Ireland's coastal communities, the Summary Guide points to the importance of finding the right balance between protecting seafood interests on the one hand, and the need to respond to the global climate emergency – specifically the requirement to deliver the State's legal obligations to reduce carbon emissions⁶ - on the other. This balance, the Summary Guide concludes, can only be achieved through meaningful engagement on the basis that both the Seafood and ORE industries can co-exist in the long term. Mutual respect, best endeavours to reach agreement, and recognition of the importance of both sectors remain the basis of effective engagement.

The Seafood Industry consider that, regardless of the move from developer-led to plan-led exploitation of Ireland's off-shore wind potential, with the Minister for Environment, Climate and Communications hereafter replacing the developer as the initiator of a plan for ORE development off the South Coast, the five principles agreed in the Summary Guide remain the best possible basis on which to successfully develop a Marine Spatial Plan/South-Coast DMAP. Consequently, these principles will guide all its dealings with the Minister of Environment, Climate and Communications as the designated Competent Authority for the South Coast DMAP (Ref: DDES-23-001), and by extension, officials etc of his department.

3. The Seafood Industry respectfully calls on the Minister⁷ to adopt the five *Summary Guide* principles in his dealings with the Seafood Industry. These are:
 - 3.1. **Engagement:** Commit to early and ongoing engagement by all parties.
 - 3.2. **Communication:** Commit to open sharing of information by both the ORE and seafood industries (and hereafter by the Minister and Department of Environment, Climate and Communications as the designated Competent Authority) that is relevant to the intended recipient and, subject to commercial / GDPR or other restrictions, communicate with each other honestly, openly, and transparently. All data / information will be evidence-based and provided in a way that is easily understood and accessible.
 - 3.3. **Cooperation:** Work together, recognising each other's expertise and the importance of both the seafood and ORE industry to Ireland, to our economy, our society, and our coastal communities, to achieve sustainable outcomes that benefit us all.
 - 3.4. **Co-existence:** Encourage the principle that the seafood and offshore renewable energy industries can work side-by-side and co-exist in a manner that respectfully shares the marine space.
 - 3.5. **Minimise or mitigate any negative impacts:** Cooperate to determine the impact, effect, and opportunities that ORE proposals may have on seafood activity and work together to avoid, minimise, or mitigate any negative impacts.

⁶ As set out in the Climate Action Plan 2023

⁷ Minister of Environment, Climate and Communications

National Marine Planning Framework - Marine Planning Policies

The Seafood Industry note the formal establishment of the National Marine Planning Framework (NMPF) in May 2021. As required under EU Directive 2014/89/EU, the NMPF is Ireland's first comprehensive marine spatial planning framework and brings together all marine-based human activities for the first time, outlining the Government's vision, objectives, and marine planning policies for each. The NMPF also details how these activities will interact with each other in an ocean space that is under increasing spatial pressure, ensuring the sustainable use of marine resources to 2040.

Prepared with an ecosystem-based approach and informed by best available knowledge, the NMPF was designed to enable the Government to a) set a clear direction for managing our seas, b) clarify objectives and priorities, and c) direct decision makers, users, and stakeholders towards strategic, plan-led, and efficient use of our marine resources. Key principles of the NMPF include:

Co-existence principle: At the heart of the NMPF is the protection of the environment and co-existence between the different maritime activities and uses. The idea of co-existence is also the basis for the more detailed principles considered in the previous section - Summary Guide on Seafood/Ore Engagement.

Minimise/mitigate negative impacts principle: The NMPF states that all proposals that assist the State in meeting the Government's ORE targets will be rigorously assessed to ensure compliance with environmental standards and to minimise impacts on the marine environment, marine ecology, and *other maritime users*. To achieve this, the NMPF sets out a series of Overarching and Sectoral Marine Planning Policies. Those relevant to ORE and seafood are further considered below, including, i) the Overarching Policy, ii) the Sectoral Policy for Co-existence, and iii) the Fisheries and Aquaculture Policies.

Principles of a plan-led approach: The NMPF also references the important role the Offshore Renewable Energy Development Plan (OREDPA) II will play in "*supporting the move to a plan-led regime* for the development of ORE". This is particularly the case with respect to core principles including data review, assessment, and methodology; technical resource and energy potential; environmental assessments; governance etc. Recognizing the publication of the South Coast DMAP proposal as *the first step* in this "*move to a plan-led regime*" underlines the role the OREDPA must play in its further development. This is considered further below.

NMPF: Overarching and Sectoral Marine Planning Policies

Central to the National Marine Planning Framework are a series of Overarching and Sectoral Marine Planning Policies (OMPPs and SMPPs respectively⁸). Mindful that these apply to all proposals capable of impacting the maritime area - including the South Coast DMAP – the NMPF is clear that they must be considered and applied in full if any plan is to be considered in compliance with the NMPF.

Overarching policy: This specifies that proposals must demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts on the subject matter of the policy including Seafood/Fisheries. To comply with this requirement, proposals must demonstrate how avoidance of significant adverse impacts is considered as the preferred option. Further, if the proposal demonstrates that significant adverse impacts cannot be avoided the proposal must then proceed to consider minimising significant adverse impacts. Finally, if the proposal demonstrates that significant adverse impacts cannot be avoided or minimised the proposal must then proceed to consider mitigating significant adverse impacts.

Co-existence policy: This encourages effective use of space to support existing and future sustainable economic activity through co-existence, mitigation of conflicts and minimisation of the footprint of proposals. Specifically, the requirement that proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference: a) minimise significant adverse impacts, b) mitigate significant adverse impacts, or c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.

Fisheries Policy 1 - Access: This requires proposals that may have significant adverse impacts on access for existing fishing activities, to demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate such impacts. d) If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.

Fisheries Policy 2 - Fisheries Management and Mitigation Strategy: This requires an agreed strategy where significant impact upon fishing activity arising from any proposal is identified. This should be prepared by the proposer of the development or other maritime area use, in consultation with local fishing interests and other interests as appropriate.

Aquaculture Policy 2 - Non-aquaculture proposals in an aquaculture production area: This requires that any non-aquaculture proposal(s) – including ORE - in an aquaculture production area must demonstrate consideration of, and compatibility with, aquaculture production. Further, where compatibility is not possible, proposals must demonstrate that they will, in order of preference a) avoid; b) minimise; or c) mitigate significant adverse impacts on aquaculture, and d) if it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding.

⁸ National Marine Planning Framework, Chapter 4, Overarching Marine Planning Policies, Chapter 16, Sectoral policies - Fisheries.

4. **Overarching and Sectoral Marine Planning Policies.** The Seafood Industry, noting that a DMAP is a sub-national management plan for a specific area of the sea that will form part of the NMPF and become a binding consideration for marine decision makers, are strongly of the view that both the Overarching, Co-existence, and Sectoral Marine Planning Policies of the NMPF must be fully incorporated into the proposed South Coast DMAP (*the plan*) such that the plan, when established, will:
- 4.1. **Avoidance:** Demonstrate how avoidance of significant adverse impacts on the seafood industry has been considered as the preferred option. (Overarching Marine Planning Policy).
 - 4.2. **Co-existence & Co-operation:** Demonstrate that appropriate consideration has been given on how to optimise the use of space, including through consideration of opportunities for 'ORE – Seafood' co-existence and co-operation, enhancing other seafood activities where appropriate. (Sectoral Marine Planning Policy for co-existence).
 - 4.3. **Access:** Demonstrate that any proposal within the plan that may have significant adverse impacts on access for existing fishing activities, has, in order of preference, sought to: a) avoid, b) minimise, or c) mitigate such impacts. (Sectoral Marine Planning Policy, Fisheries Policy 1).
 - 4.4. **Aquaculture:** Demonstrate that any non-aquaculture proposal(s) in an aquaculture production area has consideration of, and is compatibility with, aquaculture production. Further, where compatibility is not possible, demonstrate that any proposals have, in order of preference, sought to a) avoid; b) minimise; or c) mitigate significant adverse impacts on aquaculture, and d) if it is not possible to mitigate significant adverse impacts upon aquaculture, proposals have clearly established the reasons for proceeding. (Sectoral Marine Planning Policy, Aquaculture Policy 1).
5. **Fisheries Management and Mitigation Strategy:** The Seafood industry are strongly of the view that where significant impact on any fishing activity is identified from any proposal in the South Coast (or any future) DMAP, then a Fisheries Management and Mitigation Strategy (FMMS), as provided for in Fisheries Policy 2 of the National Marine Planning Framework, must be incorporated as an integral part of the 'Plan'. This Fisheries Management and Mitigation Strategy should:
- 5.1. Assess the potential socio-economic impact of planned ORE development on any affected fishery. This assessment to include all direct, indirect, and cumulative / in-combination impacts, including from:
 - 5.1.1. All ORE developments planned under Phase 1, Phase 2 or envisaged under Phase 3 and the enduring regime.
 - 5.1.2. The Government's targets of 20 GW by 2040 and *at least* 37 GW by 2050 (see Policy Statement on the Framework for Phase Two Offshore Wind, p2).
 - 5.1.3. Existing protected sites, NATURA 2000 Designations including SACs and SPAs, both existing and planned.
 - 5.1.4. Marine Protected Areas (either existing or planned) and any other closures, limitations, or restrictions on fishing introduced through the Common Fisheries Policy or national legislation.

- 5.2. Assess the potential socio-economic impact of planned ORE development on the seafood processing sector linked with any affected fishery.
 - 5.2.1. This assessment to include the direct, indirect, and cumulative / in-combination impacts.
 - 5.2.2. This assessment to include explicit reference to key fisheries that are of particular importance to the fish processing and exporting sector.
- 5.3. Assess the potential socio-economic impact of planned ORE development on the aquaculture sector.
 - 5.3.1. This assessment to include the direct, indirect, and cumulative / in-combination impacts.
- 5.4. Show how these impacts can be minimised, including reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity.
- 5.5. Include reasonable measures to mitigate any possible biological impacts on the sustainability of fish stocks including impacts on spawning, nursery, and juvenile grounds or areas of fish or shellfish abundance or the distribution of target species, especially during the planning and construction phases of ORE development.
- 5.6. Consider any impact upon cultural identity within the fishing communities.
- 5.7. Identify and quantify the impact (both in the short/immediate and longer term) of spatial squeeze on fish and shellfish population dynamics. This is the population response to increased fishing intensity (F) in area (A), that arises when a given fishing effort (E), excluded from previously worked fishing grounds, is then deployed in a smaller area. This can result in falling catch per unit effort, reduced economic efficiencies for the fishing vessels involved, and local stock depletion, particularly for fleets targeting sedentary and/or less mobile species.
- 5.8. Identify any impact of spatial squeeze on the long-term balance between fishing effort and resources and, specifically, the impact on the Fleet Capacity – Balance indicators employed by the European Commission including, for the fleets and stocks impacted:
 - (i) Sustainable harvest indicator (SHI).
 - (ii) Stocks at risk indicator (SAR).
 - (iii) Return on investment (ROI) and/or Return on Fixed Tangible Assets (RoFTA).
 - (iv) Ratio between current revenue and break-even revenue (CR/BER).
 - (v) The inactive fleet indicators.
 - (vi) The vessel use indicator.
- 5.9. Estimate, where an impact on the Fleet Capacity – Balance is predicted, the scale and cost of any fleet adjustment necessary to restore the long-term **balance** between fishing effort and resources.
- 5.10. Recognising that, for fixed bottom ORE in particular, the greatest impact is likely to be within 12 nautical miles of the coast, and for the purposes of the Common Fisheries Policy, the fishing grounds within the area covered by the South Coast DMAP proposal, must be considered as EU fishing grounds, estimate the impact *on* and response *of* fleets from other EU member states (including France, Spain, Netherlands Belgium *etc.*) and third countries (UK, Norway, Iceland *etc.*).

5.11. Based on an agreed definition of benefit and using *inter alia* cost benefit or other appropriate analysis of both the public benefits and impact (cost) on fisheries, demonstrate that the public benefit(s) outweigh any impacts identified.

5.12. Include, as part of the mitigation strategy, the necessary financial instrument to address any impacts identified, in particular displacement from or loss of access to traditional fishing grounds.

6. Fisheries Management and Mitigation Strategy - Other potential impacts: The Seafood industry are strongly of the view that the Fisheries Management and Mitigation Strategy (FMMS), provided for in Fisheries Policy 2 of the National Marine Planning Framework, should employ a risk-based assessment of other potential impacts of planned ORE development, including *inter alia*:

6.1. The impact of electromagnetic fields (EMFs) generated by ORE inter-array cables.

6.2. The impact of noise emitted during ORE installation/operation (including any piled components) on the population or distribution of any target species.

6.3. The impact on insurance liability and costs for vessels operating within or close to ORE.

6.4. The impact of any unintended interaction between ORE and fishing vessels and gear including:

6.4.1. Fishing vessel hull collides with fixed or floating structures.

6.4.2. Fishing vessel collides with a vessel associated with the installation/operation of ORE facility.

6.4.3. Fishing gear becomes entangled with mooring systems or cables or objects dropped during ORE development.

6.4.4. Fishing vessel drops its anchor onto, or drags its anchor over, ORE mooring systems cables.

6.4.5. Dredging or trawled fishing gear, damages, is damaged by, or becomes entangled with inter-array cables.

6.4.6. Lost fishing gear becomes entangled with FOW mooring systems and/or dynamic cables.

6.5. Failure of a FOW turbine's mooring system leads to a loss of station scenario, creating an unforeseen navigational hazard for fishing vessels.

6.6. The decommissioning process for ORE causes ongoing operational risk to fishing.

6.7. The decommissioning process results in discarded cables, structures etc in situ post decommissioning that impact fishing activities.

6.8. The decommissioning process results in discarded cables, structures etc in situ post decommissioning that impact site selection of future ORE projects.

6.9. Presence of ORE installations forces fishing vessel to alter their traditional transit routes.

6.10. Tow-to-port maintenance operations create additional restrictions to fishing activities.

6.11. ORE use of harbours as O&M bases results in competition for facilities.

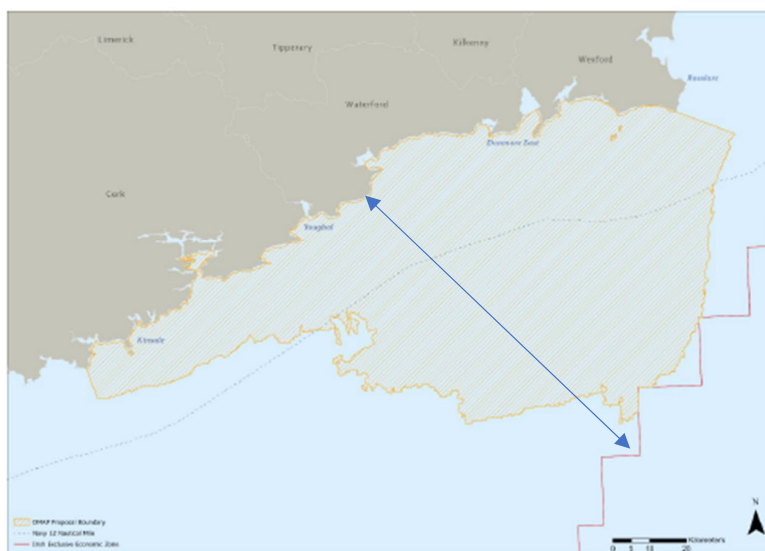
Indirect, in-combination and cumulative impacts on fish and fisheries.

Spatial pressures, both direct and indirect, and the scale of planned development.

Coincident with the ongoing development of Offshore Renewable Energy, recent years have witnessed growing concerns within the fishing industry about the loss of fishing grounds to an array of competing spatial pressures. Top of the list are offshore wind, marine protected areas, Natura 2000 sites, and other closures, limitations, and restrictions introduced through the Common Fisheries Policy or national legislation.

This deepening unease within the Seafood Industry is exacerbated by the knowledge that while marine protected areas have a statutory basis, fishermen - unlike agriculture or fish farmers - do not hold property rights over their fishing grounds. Add to that the growing evidence that fishing continues to be regarded as a soft parameter (rather than a hard constraint) when siting wind farms, and the result appears to be an almost limitless scope for displacement through direct (ORE, MPAs), indirect (cable routes etc), cumulative and in-combination impacts. This is particularly apparent in the developer-led, Phase One, proposals recently awarded MACs and ORESS contracts in the Irish Sea and Sceilde Rocks. Indeed, there is currently no evidence that marine spatial planning has provided any kind of effective safeguard for fishing and in Ireland's entire EEZ it is not possible to point to *any* area exclusively reserved for wild capture fishing. Add to this the suggestion that the proposed South Coast DMAP might result in a plan to promote *just* the use of one specific activity (*i.e.*, ORE) rather than the more complex, multi-activity, area planning consistent with Marine Spatial Planning and the outcome becomes inevitable. It points inexorably towards continued loss of fishing grounds from a seafood industry still reeling from the impact of BREXIT and the disproportionate burden (40%) borne by the Irish fishing industry.

Geographical Area of South Coast DMAP Proposal



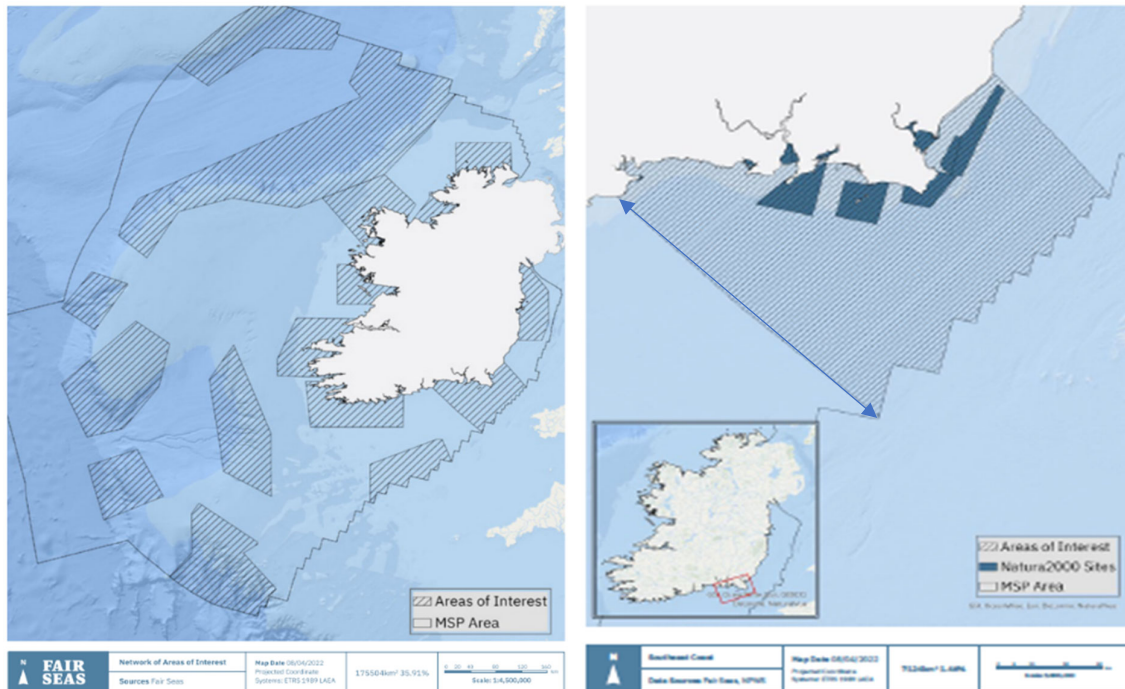


Figure 1: South Coast DMAP and candidate MPAs - Proposed by Fair Seas.

If it is the case that net zero (offshore renewable energy) and biodiversity loss (marine protected areas) are being prioritised over and above fishing, despite fishing’s value in producing low carbon, healthy and sustainable food, contributing to our food security and supporting our coastal communities, then the Seafood Industry’s concerns about relentless spatial squeeze cannot be regarded as an overreaction.

That said, the Seafood Industry believe that it is possible to reduce considerably the impact of offshore renewables on fishing if we opt for better planning, design and through the implementation/build process. A strategic approach to understanding and dealing with the potential for displacement is needed that: i) openly addresses the cumulative impact on fishing of all aspects of spatial squeeze; ii) provides a robust analysis of displacement effects including unintended consequences; and iii) incorporates appropriate mitigation measures to minimise impacts on fishing businesses and fishing communities.

Example: Spatial squeeze and Ireland’s targets for Offshore Renewable energy

The South Coast DMAP proposal specifies that it will provide support for the development of up to 900 MW capacity of offshore wind development within the South Coast ORE DMAP area and that it is *not*, at this point, intended to procure more than that within the current programme (Phase 2 or the ‘5 GW before 2030’ programme). However, the proposal then goes on to make it clear that:

- Further programmes of deployment will take place within this DMAP area over the next decade through an orderly, strategic and managed process of development.
- The process to establish the South Coast DMAP will seek to provide for additional future ORE development, for deployment beyond 2030, which will take place through a strategic and managed process of

development in different stages, in line with evolving Government climate policy and the availability of onshore grid capacity.

- The next phase of the DMAP, the ‘draft’ DMAP, will seek to identify specific sub-areas within the geographical area of the South Coast DMAP for future ORE development, as well as identifying sub-areas within which ORE development will be prohibited.

This begs the question; *just how much ORE* is planned of the South Coast, and will these developments be in *addition* to any planned Marine Protected Areas or will ORE developments be permitted within the footprint of future MPAs?

In the Policy Statement on the Framework for Phase Two Offshore wind (March 2023) the Government has made the following commitments:

- At least 5 GW of grid connected offshore wind to be delivered by 2030 (Phase 2)
- A further 2 GW of floating offshore wind (Phase 3).
- Offshore wind targets of 20 GW by 2040
- At least 37 GW by 2050.

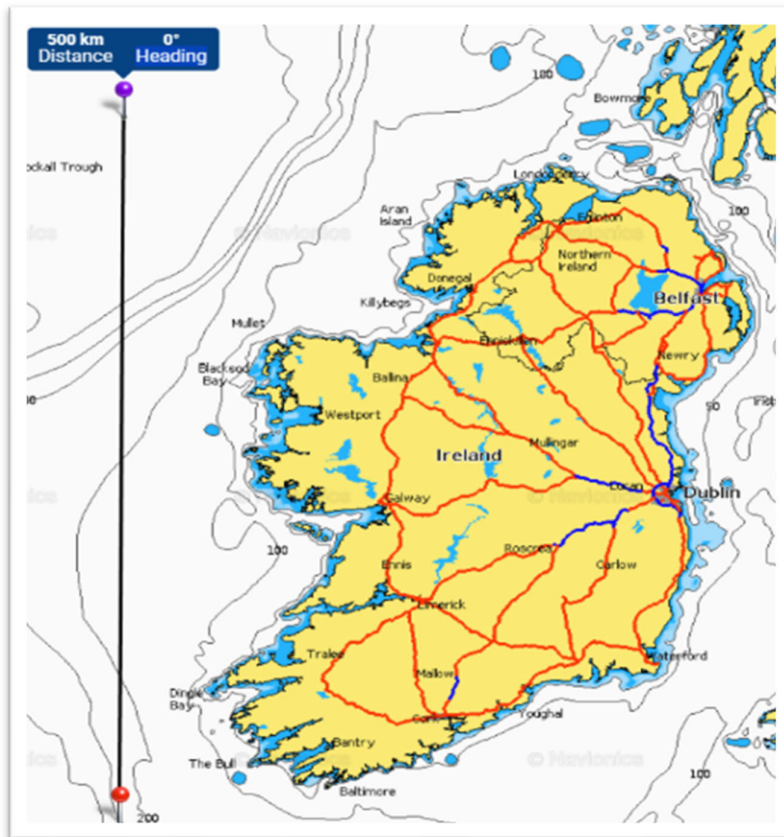
Table 1: Government ORE Targets 2030 - 2050

Year	Target	Area Required km ²	Lenth (Assuming 6nm/11.1km width) km
2030	5 GW	1,667	150
2030+	+ 2 GW (Floating Offshore)	2,333	210
2040	20 GW (Total)	6,667	600
2050	37 GW (At least)	> 12,333	> 1,110

To understand how these targets contribute to spatial squeeze it is necessary to first estimate the corresponding sea area required to host the wind farms required to meet these targets. According to the Offshore Renewable Energy Development Plan (OREDP II, Section 15 Appendix B: Technical Resource Energy Potential) a spacing between devices of seven times the rotor diameter is considered to be optimal within arrays. Such spacing would produce a power density of 5 megawatts per square kilometre (MW/km²). However, a lower power density of 3 MW/km² was used in OREDP II to account for reasonable wake replenishment in large arrays and uncertainty in what the realized density will be due to interconnection limits, cable limits, wake impacts including from proximal lease areas, and other site-specific plant design considerations. Using the figure of 3 MW/km² the targets set out in the Government policy statement are first converted to area (area required km² in table 1) and then to a

straight-line 'length equivalent' assuming (for the purpose of illustration only) a standard farm width of, for example, 6 nautical miles (11.1 km).

Taking the 2050 target of *at least* 37 GW, this requires a wind farm covering an area of some 12,333 km². For the purpose of illustration, assume that this farm is 6 nautical miles (11.1 km) wide. In this case, a single farm of 37GW would stretch, continuously, for some 1,110 km. The line shown in the accompanying map of Ireland is 500 km in length.



Government targets and implications for the South Coast DMAP area

Based on a power density of 3 megawatts per square kilometre (MW/km²), the 900 MW facility currently planned for the South Coast DMAP area could occupy some 300 km² or an area encompassing 17 km x 17 km.

If the 2050 target is implemented, and if the planned 37 GW is distributed evenly along the entire Irish coast line, then the South Coast DMAP area might expect one-third of this or 12 -15 GW. This requires over 4,000 km² of sea area equivalent to some 70 km x 70 km. Considering that the distance, by sea, from the Waterford Estuary to Cork harbour is only 90 km, this is a very significant area. And that before any consideration of the possible additional exclusion zones associated with MPAs or other closures.

7. **Indirect / in-combination issues:** The Seafood Industry, noting the requirement of Fisheries Policy 2 of the National Marine Planning Framework to undertake a socio-economic assessment of the potential impact of all stages of the planned South Coast ORE development on any affected fishery or fisheries, including the requirement to identify “indirect / in-combination matters”, calls on the Minister (as the designated Authority for the South Coast DMAP) to:
- 7.1. Quantify the scale of future ORE developments planned for the South Coast DMAP area of interest.
 - 7.2. Quantify the scale of Marine Protected Areas planned for the South Coast DMAP area of interest.
 - 7.3. Determine if these ORE developments can take place within Marine Protected Areas.
 - 7.4. Determine if these ORE developments and MPAs will exclude any fishery.
 - 7.5. Openly addresses the cumulative impact on fishing of all aspects of spatial squeeze.
 - 7.6. Provide a robust analysis of displacement effects including unintended consequences.
 - 7.7. Incorporate in the South Coast Designated Marine Area **Plan** appropriate mitigation measures to minimise the direct, indirectly and in-combination impacts of these ORE developments and MPAs on fishing businesses and fishing communities.

Offshore Renewable Energy Development Plan (ORED II).

The Seafood Industry also note the launch of the draft Offshore Renewable Energy Development Plan (ORED II) in March 2023. This represents the culmination of much work over many years to put in place a comprehensive approach to the sustainable development of Offshore Renewable Energy in Irish waters. ORED II and its predecessor OREDP were both developed with the active involvement of the Irish fishing industry.

- (i) Recalling that ORED II was designed to play a critical role in “*supporting the move to a **plan-led regime** for the development of ORE*” (ORED II, Section 2.3, p16);
- (ii) noting the reference in the National Marine Planning Framework to that role along with the requirement in ORE Policy 2 that “*proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (ORED II) and its successor*” (NMPF, Section 13, p120), and
- (iii) noting the stipulation in the South Coast DMAP Proposal (Section 7, p14) that “*the Phase Two policy ensures that all future offshore wind development in the Irish maritime area from now onwards, including but not limited to Phase Two, will take place according to a **plan-led regime**.*”

it comes as a surprise that while the Policy Statement on the Framework for Phase Two Offshore Wind (March 2023) specifies that “*Phase 3 will be informed by the in-development Offshore Renewable Energy Development Plan*” no mention is made of the ORED II in the context of Phase Two developments.

OREDP II and the development of a South Coast DMAP

Recognising that:

- OREDP II is one of the building blocks in moving towards a plan-led approach to developing renewable energy as part of an enduring or long-term regime.
 - OREDP II focuses on spatial strategy, proposing how the State will identify, in line with the principles of good maritime spatial planning, areas best suited for ORE.
 - OREDP II contains an assessment of the known data and information available at a national level on a range of maritime economic activities, including seafood, to inform development of ORE.
 - OREDP II used criteria developed in conjunction with the Seafood Industry to identify the three “*Potential Broad Areas of Interest*”, that Celtic Sea East/South Coast, Mid-West and North-West.
8. **OREDP II Data & Methodology:** The Seafood industry are strongly of the view that OREDP II provides the best currently available and *agreed* tools to inform and *support the move to a plan-led regime for the development of ORE* projects in Phase Two, Three and the Enduring Regime.
- 8.1. While accepting that OREDP II is currently in draft, the data sets and methodology used to determine the Broad Areas of Interest (AOI) remain valid. These include EU logbooks, VMS, and national surveys etc. conducted by the Marine Institute, BIM, and the seafood industry.
- 8.2. The familiarity and experience of these data sets, developed during OREDP I and II, is essential to a deeper understanding of where ORE might be located in these Broad Areas of Interest such that it has minimum impact.
9. **OREDP II Governance Structures:** The Seafood industry are strongly of the view that the governance structure put in place for OREDP II was essential to achieve the level of cross-Government, industry, NGO etc. cooperation necessary for delivery of that plan. We strongly urge the Minister, in line with marine spatial planning best practice, to maintain this or a similar structure throughout the South Coast DMAP planning stages including: i) a Steering Group, ii) a Data and Scientific Group, and iii) an Advisory Group to inform the development of the DMAP and engage with a wide range of stakeholders for input.

Concluding Remarks

The world is in a race to address climate change, not least the urgent need to hold the increase in global temperature to below 2 degrees centigrade above pre-industrial levels and optimally to limit the temperature increase to 1.5 degrees. This is the first, and often quoted, aim of the Paris Agreement. Perhaps less well known is the second. This tasks us with “increasing our *adaptability* to climate change and *encouraging* low greenhouse gas emissions but in a way that *doesn't threaten our food supply*”.

Ireland is one of the 186 countries that signed and agreed *all* the terms of the Paris Climate Agreement. In addition, the EU agreed that all member states, Ireland included, should:

- Reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990.
- Reduce emissions by at least 20% by 2020 (when compared to 2005 levels).
- Ensure that 16% of the energy used across all sectors came from renewable resources.
- That 10% of the energy used in transport is renewable.

With a sea area seven times that of our land, the opportunities this presents for offshore wind power are significant. It is not surprising that Ireland is a key emerging market for offshore renewable energy. But if that market is to be realised, we must ensure that the investment environment remains attractive; simply put Ireland cannot afford a repeat of previous planning debacles.

The Corrib gas field was discovered off the north Mayo coast by Enterprise Energy Ireland in 1996. But it took almost 20 years, to December 2015 for gas to flow. This was solely because its development was held up by various *Bord Pleanála* hearings and local resistance that resulted in the jailing of five men amid protests on land and sea.

A central tenet of this submission is the vital need to progress the development of ORE in Ireland's sea area in a way that creates consensus and avoids any repeat of past – especially planning - mistakes. Whether through a desire to hasten the development of offshore renewables or simply to placate long frustrated developers, it remains to be seen whether the poorly structured, often opaque, developer led approach used for Phase I projects will deliver in the long run. Will these projects, like Corrib, become embroiled in bitter planning hearings and mounting local resistance? It is certainly not too late to apply the principles, agreed over the last decade and set out in detail in this submission. To not do so for Phase I projects might, ultimately, result in longer lead times. To not do so for Phase II projects would be truly unforgivable.

Seafood is a low carbon healthy and sustainable part of our food supply and its production greatly supports our coastal communities. The seafood industry recognises that an orderly development of offshore wind is essential and could offer significant economic and community benefits. As an industry the seafood sector stands ready to work towards achieving a consensus on that orderly development; to use its knowledge and expertise, honed over many years, towards the common good. We truly hope this offer will be met in good faith.

/End

Representative Organizations

This submission, and the framework for future cooperation it represents, is the collective view of the Irish Seafood Industry and specifically the following organisations:

- IFA (Aquaculture).
- Irish Fish Producers and Exporters Association.
- Irish Fish Producers Organisation.
- Irish South and East Fish Producers Organisation.
- Irish South and West Fish Producers Organisation.
- Killybegs Fishermen's Organisation.
- National Inshore Fisherman's Association.
- South East Regional Inshore Fisherman's Forum

BIBLIOGRAPHY

1. **HARNESSING OUR OCEAN WEALTH** - An Integrated Marine Plan for Ireland. July 2012. This recognized that the seas around Ireland “Contain some of the largest and most valuable sea fisheries resources in Europe”. As recently as last March (2023) BIM – BUSINESS OF SEAFOOD calculated the value of Ireland’s seafood economy as €1.3 billion in 2022, despite a volatile year.
2. **OFFSHORE RENEWABLE ENERGY DEVELOPMENT PLAN: OREDP 1-** A Framework for the Sustainable Development of Ireland’s Offshore Renewable Energy Resource. February 2014 and updated in 2018.
3. **TOWARDS A MARINE SPATIAL PLAN for Ireland.** Launched in 2017 this established a core principle of marine spatial planning in Ireland, namely to “Promote sustainable development by applying an ecosystem-based approach to energy, maritime transport, fisheries, aquaculture, tourism, extraction of raw materials, preservation of the environment and resilience to climate change.
4. **NATIONAL MARINE PLANNING FRAMEWORK:** This was launched in July 2021 as Ireland’s first maritime spatial plan. It contains a whole chapter (Section 16) devoted to fisheries and sets some very clear objectives.
 - Delivering a sustainable seafood sector focused on competitiveness and innovation.
 - Promoting a sustainable, profitable, and self-reliant industry that protects and enhances the social and economic fabric of rural coastal communities.
 - Sustaining primary food producers contributing to food security.
 - Managing utilisation of sea-fisheries resources in consultation with stakeholders to promote environmental sustainability and the development of the sector’s economic and social contribution to rural and coastal communities.
 - It also developed 6 key Planning policies, including Fisheries Policy 2: “Where significant impact upon fishing activity arising from any proposal is identified, a Fisheries Management and Mitigation Strategy (FMMS) should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and other interests as appropriate. All efforts should be made to agree the FMMS with those interests”.
5. **OFFSHORE RENEWABLE ENERGY DEVELOPMENT PLAN (OREDP) II.**
 - The draft OREDP II report was launched in March this year.
 - It represents the culmination of much hard work over many years to put in place a comprehensive approach to the sustainable development of Offshore Renewable Energy in Irish waters.
 - This report was developed with the active involvement of the Irish fishing industry.
 - It covers all the main topics that must be considered in the development of (South East) DMAP.
 - OREDP II is a key component of the framework through which Ireland’s Seafood Industry look forward to cooperating fully in the development of the Southeast DMAP and we strongly urge the Department to embrace it fully in the work ahead.