



Morven North Offshore Wind Array Project

Environmental Impact Assessment Report

**Volume 4, Annex 3: Fisheries Mitigation
Monitoring Communication Plan (FMMCP)
(Version 1)**

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Glossary

Term	Meaning
Commercial Fishing	Any form of fishing activity legally undertaken where the catch is sold for taxable profit.
Cooperation Agreement	A formal agreement – which may also be referred to as a disruption agreement - between the Applicant and a fisher, intended to reduce disturbance or displacement to a fishery caused by Morven North or Morven South development activities. Such agreements may be supported by monetary payment only where loss or access results from Morven North or Morven South activities and that loss of access results in an evidenced financial loss, or a demonstrable risk of financial loss, to active fishing vessels.
Demersal Seine	A seine net is a long net, with or without a bag in the centre, which is set either from the shore or from a boat for surrounding a certain area and is operated with 2 (long) ropes fixed to its ends (for hauling and herding the fish).
Demersal Trawl	A demersal trawl is a cone shaped net that is towed on the seabed to target demersal fish species.
Designed-in measures	Either primary or tertiary mitigation measures, which are considered inherent to the project's design. Includes: <ul style="list-style-type: none"> • measures included as part of the project design; • industry standard measures committed to by the Applicant (including post-consent management plans); • measures required to meet legislative requirements.
Fishery	A group of vessel voyages which target the same species or use the same gear.
Fishing Ground	An area of water or seabed targeted by fishing activity.
Fleet	A physical group of vessels sharing similar characteristics (e.g. nationality).
Gear Type	The method / equipment used for fishing.
International Council for the Exploration of the Seas (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 30nm x 30nm). A number of rectangles are amalgamated to create ICES statistical areas.
Morven Branxton Area Grid Connection Project (hereafter "MBAGC Project")	The MBAGC Project is comprised of the export cable and onshore substation.
Morven Hawthorn Pit Grid Connection Project (hereafter "MHPGC Project")	The MHPGC Project is comprised of the export cable and onshore substation.
Morven North Boundary	Boundary within which the wind turbines and foundations, Offshore Substation Platforms and foundations, inter-array cables and interconnector cables for Morven North will be located.
Morven North Environmental Impact Assessment (EIA) Report	A document prepared to provide information on the baseline environment and a systematic assessment of Morven North's likely significant effects on the receiving environment. This includes consideration of measures to avoid, prevent, reduce or offset likely significant adverse environmental effects, a description of the reasonable alternatives considered by the Applicant, and a non-technical summary.

Term	Meaning
Morven South Boundary	Boundary within which the wind turbines and foundations, OSPs and foundations, inter-array cables and interconnector cables for Morven South will be located.
Morven South Environmental Impact Assessment (EIA) Report	A document prepared to provide information on the baseline environment and a systematic assessment of Morven South's likely significant environmental effects on the receiving environment. This includes consideration of measures to avoid, prevent, reduce or offset likely significant adverse environmental effects, a description of the reasonable alternatives considered by the Applicant, and a non-technical summary.
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 Trawl	A net used to target fish species in the midwater column.
Potting	Pots (which may be referred to as creels) are generally rigid structures into which fish or shellfish are guided or enticed through funnels that make entry easy but from which escape is difficult. There are many different styles and designs, each one has been designed to suit the behaviour of its target species.
Safety Zones	A statutory marine zone demarcated for the purposes of safety around an installation.
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 to the after end of the mat to form a bag.
the Applicant	The entity making the Applications; Morven Offshore Wind Limited (MvOWL).
The Morven North Offshore Wind Array Project (hereafter "Morven North")	The Morven North Offshore Wind Array Project, which includes the wind turbines and foundations, offshore substation platforms (OSPs) and foundations, inter-array and interconnector cables and associated infrastructure located within the Morven North Boundary. Consent for the export cables for Morven North will be sought separately.
The Morven Option Lease Agreement Site (hereafter "Morven Site")	The 859km ² area awarded to bp and EnBW's 'Morven' project, identified as a result of the ScotWind leasing round and located in Plan Option (PO) area E1. Morven North and Morven South are two distinct projects, located with the Morven Option Lease Agreement Site.
The Morven South Offshore Wind Array Project (hereafter "Morven South")	The Morven South Offshore Wind Array Project, which includes the wind turbines and foundations, offshore substation platforms (OSPs) and foundations, inter-array and interconnector cables and associated infrastructure located within the Morven South Boundary. Consent for the export cables for Morven South will be sought separately.
Vessel Monitoring System (VMS)	A system used in commercial fishing to allow environmental and fisheries regulatory organisations to monitor, minimally, the position, time at a position, and course and speed of fishing vessels.

Acronyms

Acronym	Meaning
ADR	Alternative Dispute Resolution
CaP	Cable Plan
CBRA	Cable Burial Risk Assessment
CFLO	Company Fisheries Liaison Officer
CFWG	Commercial Fisheries Working Group
CMS	Construction Method Statement
COLREGS	The Convention on the International Regulations for Preventing Collisions at Sea
DSLPL	Development Specification and Layout Plan
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FIR ²	Fishing Industry Representative
FLOWW	Fisheries Liaison with Offshore Wind and Wet Renewables group
FMMCP	Fisheries Mitigation Monitoring and Communication Plan
HSE	Health, Safety and Environment
ICES	International Council for the Exploration of the Seas
IMO	International Maritime Organization
KIS-ORCA	Kingfisher Information Service – Offshore Renewable and Cable Awareness
LMP	Lighting and Marking Plan
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate-Licensing Operations Team
MMO	Marine Management Organisation
N&EC RIFG	North and East Coast Regional Inshore Fisheries Group
NLB	Northern Lighthouse Board
NSPVMP	Navigational Safety Plan and Vessel Management Plan
NtM	Notice to Mariners
O&M	Operations and Maintenance
OFLO	Offshore Fisheries Liaison Officer
OMP	Operation and Maintenance Plan
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
SFF	Scottish Fishermen's Federation
SOLAS	International Convention for the Safety of Life at Sea
SPFA	Scottish Pelagic Fisherman's Association
SWFPA	Scottish White Fish Producers Association

Acronym	Meaning
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
VMS	Vessel Monitoring System

Units

Unit	Meaning
km	Kilometre
MW	Megawatt
nm	Nautical mile

1 Introduction

1.1 Overview of Morven North and Morven South

- 1.1.1.1 The Morven North Offshore Wind Array Project (hereafter, 'Morven North') and the Morven South Offshore Wind Array Project (hereafter, 'Morven South') are both located within the Morven Option Lease Agreement Site (hereafter, 'Morven Site') in Scottish offshore waters (Figure 1.1). Morven North is located approximately 61km from the Aberdeenshire coast (at its closest point) and Morven South is located approximately 86km from the Aberdeenshire coast (at its closest point). Morven North and Morven South will each comprise wind turbines, Offshore Substation Platforms (OSPs), associated foundations, inter-array and interconnector cables and scour and cable protection. Consent for the offshore export cables of Morven North and Morven South will be sought separately. As shown in Figure 1.1, Morven North is situated northwest of Morven South.
- 1.1.1.2 The subject of this Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) is the offshore infrastructure of Morven North and Morven South seaward of Mean High Water Springs.
- 1.1.1.3 Morven North will comprise the following infrastructure:
- up to 96 wind turbines on fixed foundations;
 - up to 5 OSPs on fixed foundations;
 - up to 424km of inter-array cables, which connect the wind turbines to one another and then to the OSPs;
 - up to 484km of interconnector cables which connect the OSPs to one another;
 - scour and cable protection where required.
- 1.1.1.4 Morven South will comprise the following infrastructure:
- up to 95 wind turbines on fixed foundations;
 - up to 5 OSPs on fixed foundations;
 - up to 420km of inter-array cables, which connect the wind turbines to one another and then to the OSPs;
 - up to 264km of interconnector cables which connect the OSPs to one another;
 - scour and cable protection where required.
- 1.1.1.5 Morven North and Morven South offshore construction works will each take place within an indicative five-year period, and these periods may or may not overlap. Both Morven North and Morven South will have operational lifetimes of 35 years.

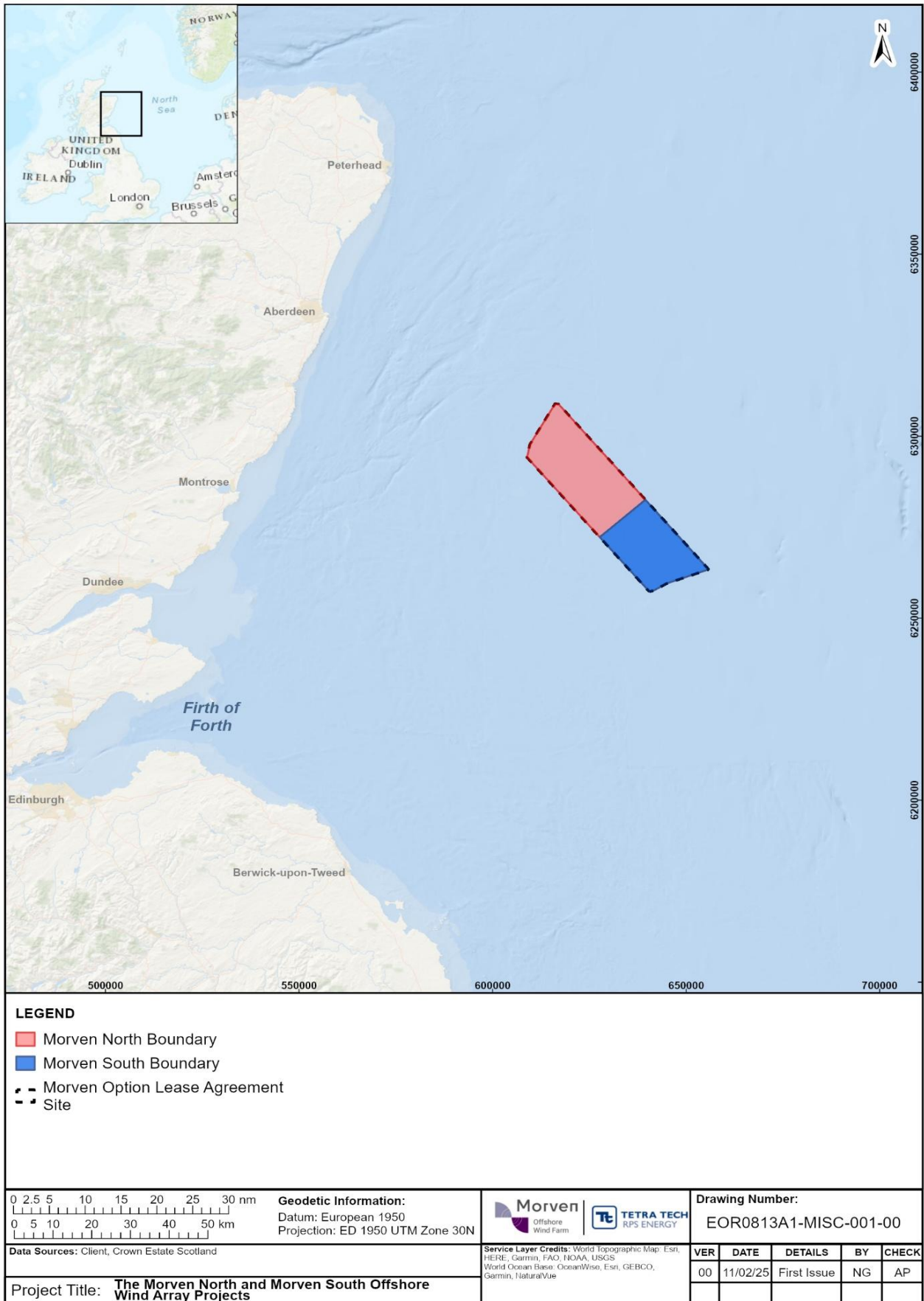


Figure 1.1: The boundaries of Morven North and Morven South within the Morven Option Lease Agreement Site

1.2 Purpose of this document

- 1.2.1.1 This FMMCP aims to document and demonstrate how the Applicant will liaise and co-exist with the commercial fishing industry and deliver commitments to mitigation and monitoring made in the Morven North Environmental Impact Assessment (EIA) Report and Morven South EIA Report. These measures are intended to avoid or reduce potential impacts of Morven North and Morven South on the commercial fishing industry.
- 1.2.1.2 In support of this aim, the objectives of the FMMCP are as follows:
- set out mitigation measures relevant to the fishing industry and describe how these will be delivered;
 - set out the approach to monitoring fisheries activity in response to Morven North and Morven South;
 - describe the approach to fisheries liaison, identifying how communication between the Applicant and the fishing industry will take place and confirming liaison roles and responsibilities;
 - set out procedures to manage interactions between the Applicant and the fishing industry, including procedures relating to gear loss and gear relocation or removal.
- 1.2.1.3 The Applicant regards coexistence as the joint presence of both industries (offshore wind and commercial fisheries), working together within and around Morven North and Morven South, and believes that application of measures set out in this FMMCP supports opportunities for coexistence.
- 1.2.1.4 The success of the FMMCP in helping to deliver coexistence will require constructive and effective communication between the Applicant and the fishing industry, and the support and engagement of both parties.
- 1.2.1.5 This FMMCP covers both Morven North and Morven South. It is envisaged that Morven North and Morven South may require separate FMMCPs at the stage of pre-construction consent condition discharge. The commitments presented in this shared FMMCP will be upheld in any future iterations of the document specific to Morven North and Morven South.
- 1.2.1.6 This FMMCP covers the construction and Operation and Maintenance (O&M) phases of Morven North and Morven South. An updated FMMCP will be prepared ahead of decommissioning in line with any conditions of the relevant Section 36 Consent and Marine Licences and the Decommissioning Programme, that may be required at that time under the Energy Act 2004¹ or legislative requirements applicable at that time.
- 1.2.1.7 Separate FMMCPs will cover the transmission assets associated with Morven North and Morven South, referred to as the Morven Branxton Area Grid Connection Project (MBAGC Project) and the Morven Hawthorn Pit Grid Connection Project (MHPGC Project), which are subject to separate consents.

1.3 Relevant guidance

- 1.3.1.1 This FMMCP has been developed having regard to current Scottish Government and Marine Directorate guidance relevant to fisheries mitigation, monitoring and liaison in the context of offshore renewable energy developments. Relevant guidance includes:
- Marine licensing and consenting: offshore renewable energy projects, Mitigation and Monitoring Plans, Fisheries Mitigation, Monitoring and Communication Plan (hereafter referred to as the Marine Directorate Guidance) (Marine Directorate, 2025);

¹ Energy Act 2004

- Offshore windfarms - monitoring impacts on the commercial fishing industry: good practice guidance (Scottish Government, 2025).

1.3.1.2 In preparation of this FMMCP, other relevant guidance and proposals have also been considered, including Moray Firth and Forth and Tay Commercial Fisheries Working Groups (CFWG) Proposal for Consideration of Mobile Gear Disruption Payments for Construction Phase of Fixed Bottom Offshore Renewable Energy Installations (2024). Engagement to date with fisheries stakeholders and fishermen has also informed the development of this FMMCP; see Section 2.2.

1.3.1.3 It is noted that established fisheries liaison best practice has historically been developed through the Fisheries Liaison with Offshore Wind and Wet Renewables group (FLOWW). The Scottish Fishermen’s Federation (SFF) and its affiliated Associations have withdrawn from the FLOWW process and do not currently endorse that guidance. No alternative SFF-endorsed fisheries liaison guidance is presently available.

1.3.1.4 In preparing this FMMCP, the Applicant has had regard to established fisheries liaison good practice as reflected within current Marine Directorate guidance and industry practice to date. The fisheries liaison, mitigation, monitoring and communication procedures relevant to Morven North and Morven South are set out directly within this FMMCP, rather than through reliance on cross-reference to external guidance, in order to provide clarity and transparency.

1.3.1.5 Should new or replacement Scottish-specific fisheries liaison guidance be issued during the lifetime of Morven North or Morven South, the FMMCP will be reviewed and updated as appropriate.

1.3.1.6 For completeness and transparency, relevant published guidance documents are listed in the References section of this FMMCP.

1.4 Consents and licences

1.4.1.1 The following consents and licences are required for Morven North and Morven South. These are expected to be conditioned to require preparation of and adherence to an approved FMMCP:

- Section 36 consents under the Electricity Act 1989 for generating stations with capacity of >50 Megawatts (MW) (out with 12nm);
- Marine Licences under the Marine and Coastal Access Act 2009 for construction or deposition in or over the sea, or on and under the seabed.

1.4.1.2 The relevant consent and licence conditions setting out the requirement for a FMMCP and a Company Fisheries Liaison Officer (CFLO) are set out in full in Table 1.1. This document is intended to satisfy the requirements of these conditions.

Table 1.1: Consent conditions relevant to this Fisheries Mitigation, Monitoring and Communication Plan [HOLD pending issue of consents]

Consent / condition number	Condition wording	Relevant FMMCP section
Section 36 / xx	Fisheries Mitigation, Monitoring and Communication Plan	
Marine Licence / xx	Company Fisheries Liaison Officer	

1.5 Fisheries Mitigation, Monitoring and Communication Plan approval and updates

- 1.5.1.1 In line with Marine Directorate (2025) guidance, this FMMCP has been submitted at consent application stage, following engagement on its content with the stakeholders listed in Section 2.2. Stakeholder feedback on the FMMCP is presented in Appendix A.
- 1.5.1.2 The FMMCP is considered to contain sufficient information for fisheries stakeholders to make informed representations and for Scottish Ministers to determine the application and approve the FMMCP.
- 1.5.1.3 In line with the guidance, relevant consent conditions, as set out in Section 1.4, allow for post-consent update of the FMMCP where necessary, for example, to reflect changes in project design.

1.6 Linkages with other consent plans

- 1.6.1.1 This FMMCP sets out specific procedures relating to the mitigation of effects on commercial fisheries, the Applicant's approach to monitoring, and the approach to ongoing communication and liaison with the fishing industry. It will form part of a suite of documents that will provide the framework for the management of the construction and O&M of Morven North and Morven South.
- 1.6.1.2 A summary of consistency and linkage of the FMMCP with other consent plans is provided in Table 1.2. To avoid duplicating information across multiple consent plans, Table 1.2 identifies where relevant linkages occur rather than restating the content of those plans within the FMMCP.

Table 1.2: Fisheries Mitigation, Monitoring and Communication Plan consistency with and links to other consent plans

Consent plan	Consistency with and linkage to the FMMCP
Development Specification and Layout Plan (DSLPL)	The DSLPL will set out the final design and layout parameters associated with Morven North and Morven South.
Environmental Management Plan (EMP)	Sets out the environmental management framework for the construction and operation of Morven North and Morven South. Of relevance to the FMMCP, it sets out procedures for reporting of dropped objects and pollution response procedures. An EMP is provided in Volume 4, Annex 1: Environmental Management Plan (Version 1).
Lighting and Marking Plan (LMP)	Provides details of lighting and marking of Morven North and Morven South during construction and operation. Of relevance to the FMMCP, it confirms how Morven North and Morven South will be marked and lit in terms of aiding safe marine navigation. An LMP is provided in Volume 4, Annex 4: Lighting and Marking Plan (Version 1)
Cable Plan (CaP)	Provides details on cable specifications, routing, installation method and protection. Of relevance to the FMMCP it confirms cable burial and protection details, as informed by the Cable Burial Risk Assessment (CBRA).
Navigation Safety Plan and Vessel Management Plan (NSPVMP)	Provides details on the navigational safety measures to be employed during the construction and operation of Morven North and Morven South. Of relevance to the FMMCP, it describes Morven North and Morven South related vessel activity and how it will be managed, covering use of Safety Zones, promulgation of information to marine users, and a de-confliction notice. An

Consent plan	Consistency with and linkage to the FMMCP
	NSPVMP is provided in Volume 4, Annex 5: Navigation Safety Plan and Vessel Management Plan (Version 1).
Construction Method Statement (CMS)	The CMS sets out the proposed construction activities and methods for Morven North and Morven South. It is relevant to the FMMCP because the fisheries liaison and mitigation measures presented in the FMMCP are designed to manage interactions arising from those construction activities.
Operation and Maintenance Plan (OMP)	Provides details of how Morven North and Morven South will be operated, inspected, and maintained throughout their operational life. Of relevance to the FMMCP, it confirms the nature and scale of O&M activity.
Environmental Monitoring Plan	Provides details of the environmental monitoring to be undertaken in relation to Morven North and Morven South. Monitoring specific to commercial fisheries is described in this FMMCP.

1.7 Document structure

1.7.1.1 This FMMCP has been structured as outlined in Table 1.3. The document has been structured as such to reflect the requirements of the Marine Directorate Guidance (Marine Directorate, 2025).

Table 1.3: Fisheries Mitigation, Monitoring and Communication Plan document structure

Section	Summary of content
Section 1: Introduction	Identifies the scope of the FMMCP and provides an overview of Morven North and Morven South.
Section 2: Fisheries Overview	Provides an overview of fishing activity within the Morven North Boundary and the Morven South Boundary, including a summary of the impacts on commercial fisheries and fish and shellfish stocks.
Section 3: Fisheries Mitigation	Sets out the Applicant's approach to mitigation, focused on enabling coexistence.
Section 4: Fisheries Monitoring	Sets out the Applicant's approach to monitoring fisheries activity in response to Morven North and Morven South.
Section 5: Communication	Sets out the Applicant's approach to communication with the fishing industry and other relevant stakeholders.
Annex A: Summary of Stakeholder Engagement	Provides a summary of stakeholder engagement carried out in relation to the FMMCP.

2 Fisheries overview

2.1 Fishing activity within Morven North and Morven South

2.1.1.1 This FMMCP has been informed by the data collected to support the Morven North and Morven South EIA Reports, together with subsequent engagement with commercial fisheries industry stakeholders. Information on fishing activity presented in the EIA Reports is not repeated in full here, though a summary is provided.

2.1.1.2 Based on the information gathered, Table 2.1 identifies the fishing fleets with which Morven North and Morven South may interact. Reference is made in Table 2.1 to fishing activity in the Local and Regional Commercial Fisheries Study Areas used to inform the commercial fisheries EIA; Figure 2.1 identifies the location and extent of these areas.

2.1.2 Summary of fishing activity by gear type – Morven North

2.1.2.1 Dredge Fishery: Dredging activity, targeting king scallop, occurs primarily within ICES rectangle 42E8 and is concentrated inshore of Morven North. Spatial fisheries data indicate no overlap with the Morven North Boundary. Peak landings are recorded in spring months.

2.1.2.2 Demersal Otter Trawl Fishery: Demersal trawlers target haddock and other whitefish species, with activity largely associated with ICES rectangle 42E9. Fishing effort is mainly located to the north and east of Morven North, with limited overlap along the northeastern boundary and southwest corner. Morven North does not overlap suitable *Nephrops* habitat. Landings peak in early summer.

2.1.2.3 Potting Fishery: Potting vessels targeting lobster and crab operate predominantly inshore, with limited activity within Morven North. Landings occur year-round, with a slight late spring peak.

2.1.2.4 Demersal Seine Fishery: Demersal seine activity, targeting haddock, is focused north of the site within ICES rectangle 42E9. Low levels of activity are recorded along the northeastern boundary. Landings show seasonal peaks in early summer and winter.

2.1.2.5 Pelagic Trawl Fishery: Pelagic trawl activity within the Morven North Local Commercial Fisheries Study Area is minimal and does not overlap Morven North.

2.1.3 Summary of fishing activity by gear type – Morven South

2.1.3.1 Dredge Fishery: Dredging activity, targeting king scallop, occurs primarily within ICES rectangle 42E9 and is concentrated inshore of Morven South. Spatial data indicate no overlap with the Morven South Boundary. Landings peak in spring.

2.1.3.2 Demersal Otter Trawl Fishery: Demersal trawlers target haddock and other whitefish species, with activity largely associated with ICES rectangle 42E9. Fishing effort is predominantly located to the north and east of Morven South, with only localised overlap with the southeastern corner of Morven South. The site does not overlap suitable *Nephrops* habitat. Landings peak in early summer.

2.1.3.3 Potting Fishery: Potting vessels targeting lobster and brown crab operate mainly inshore, with limited activity within Morven South. Landings occur throughout the year, with a slight late spring peak.

2.1.3.4 Demersal Seine Fishery: Demersal seine activity, targeting haddock, occurs within ICES rectangle 42E9 but is concentrated north of Morven South. Landings peak in early summer and winter.

2.1.3.5 Pelagic Trawl Fishery: Pelagic trawl activity within the Morven South Local Commercial Fisheries Study Area is minimal and does not overlap Morven South.

Table 2.1: Commercial fishing fleets relevant to Morven North and Morven South

Fishing Fleet	Morven North	Morven South	Local and Regional Commercial Fisheries Study Areas
Dredge fishery Primarily Scottish, and some English-registered vessels, mostly over 15m length, targeting king scallop (<i>Pecten maximus</i>).	No dredge activity occurring with any regularity.	No dredge activity occurring with any regularity.	Dredge activity evident and focused in areas to the west of the Morven Site.
Demersal Otter Trawl Fishery Primarily Scottish, and some English and Northern Irish-registered vessels, under and over 15m length, targeting Nephrops (<i>Nephrops norvegicus</i>) and to a lesser extent haddock (<i>Melanogrammus aeglefinus</i>) and other whitefish species.	Limited demersal trawl activity. Evidence of some trawl activity along northeastern boundary of Morven North.	Limited demersal trawl activity across the majority of Morven South. Evidence of some trawl activity overlapping the southeastern corner of Morven South.	High levels of demersal trawl activity focused to the northeast of the Morven Site.
Potting Fishery Scottish registered vessels, mostly under 15m length, targeting lobster (<i>Homarus gammarus</i>), brown crab (<i>Cancer pagurus</i>) and velvet crab (<i>Necora puber</i>).	Limited potting activity.	Limited potting activity.	Potting activity evident and focused in areas to the west of the Morven Site.
Demersal Seine Fishery Primarily Scottish registered vessels, over 15m length, targeting haddock.	No demersal seine activity occurring with any regularity.	No demersal seine activity occurring with any regularity.	Low levels of demersal seine activity, focused to the north and east of the Morven Site, with some activity to the immediate northeast of the Morven Site.
Pelagic Trawl Fishery Primarily Scottish, and some Northern Irish-registered vessels, over 40m length, targeting herring (<i>Clupea harengus</i>). Occasional presence of non-UK pelagic trawlers from France, Denmark, the Netherlands, Germany and Norway within the Local Commercial Fisheries Study Area.	No pelagic trawl activity occurring with any regularity.	No pelagic trawl activity occurring with any regularity.	Low levels of pelagic trawl activity, focused in discrete areas to the north and south of the Morven Site.

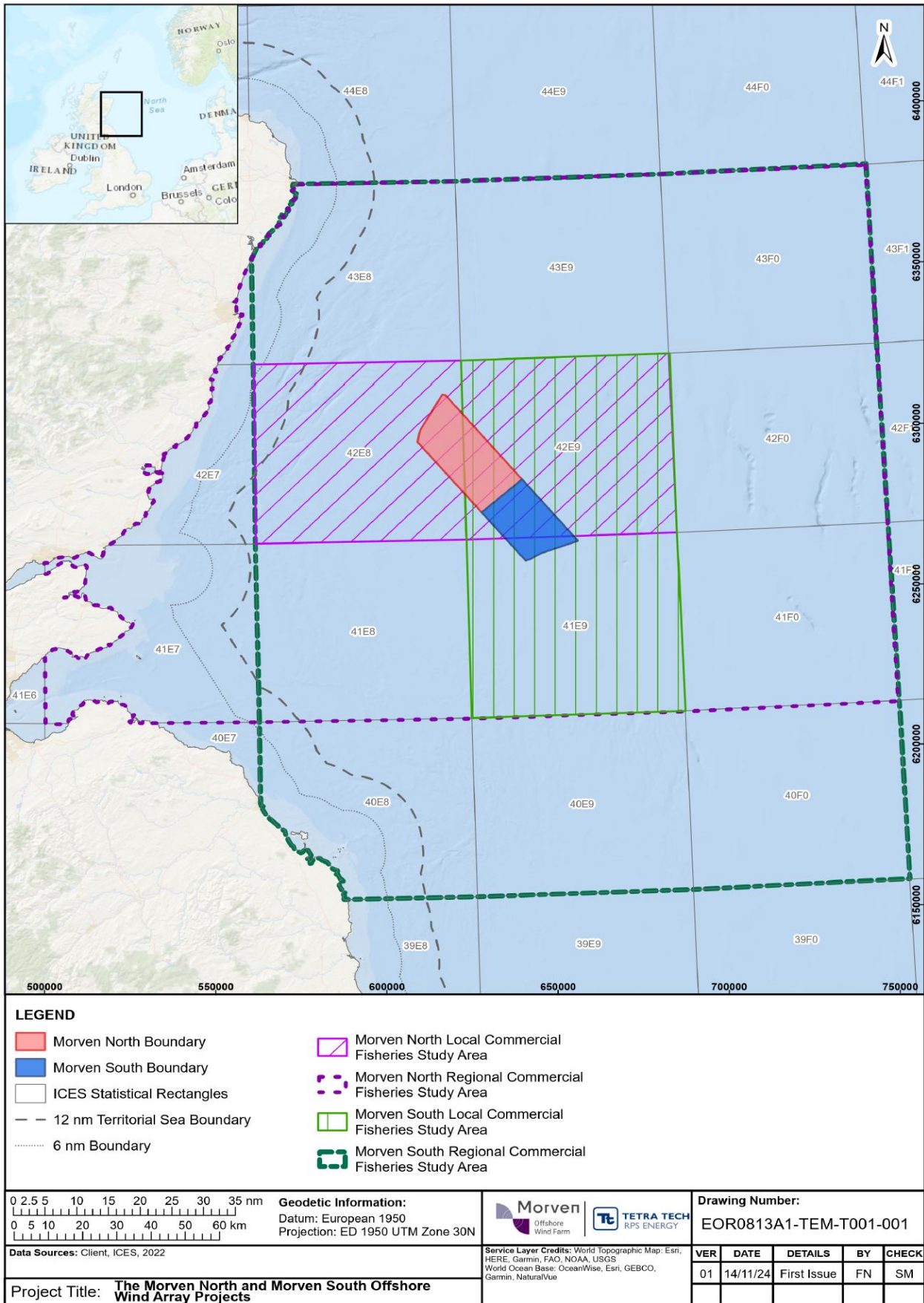


Figure 2.1: Morven North and Morven South and Commercial Fisheries Study Areas

2.2 Fisheries stakeholders and engagement

2.2.1.1 The Applicant has undertaken statutory and non-statutory consultation with fisheries stakeholders in relation to Morven North and Morven South since early 2023. A summary of consultation undertaken prior to submission of the Applications for Morven North and Morven South, including in relation to the development of this FMMCP, is provided in Section 12.4, Volume 2, Chapter 12: Commercial Fisheries of the Morven North and Morven South EIA Reports and is not duplicated here.

2.2.1.2 Fisheries stakeholders engaged in relation to the Applications and FMMCP are:

- SFF;
- Scottish White Fish Producers Association (SWFPA);
- Scottish Pelagic Fishermen's Association (SPFA);
- North and East Coast Regional Inshore Fisheries Group (N&EC RIFG);
- Marine Directorate – Licensing Operations Team (MD-LOT).

2.2.1.3 Engagement with local individual fishers has primarily been direct with the Applicant and their CFLO, who has been in this post since 2023. It is envisaged that this form of engagement with local fishermen will be ongoing throughout the lifetime of Morven North and Morven South.

3 Fisheries mitigation

3.1 Overview

- 3.1.1.1 It is the intention of the Applicant to facilitate coexistence wherever possible during all phases of Morven North and Morven South which will include the implementation of mitigation strategies to reduce the overall impacts of Morven North and Morven South on commercial fisheries.
- 3.1.1.2 This section of the document presents measures, in addition to fisheries liaison (see Section 5), that will be put in place by the Applicant to promote coexistence between Morven North and Morven South and fishing activity.

3.2 Principles of mitigation

- 3.2.1.1 The Applicant will adhere to the principles set out immediately below. These principles are aligned with established fisheries liaison good practice as applied within the offshore wind sector:
- The Applicant will implement measures to reduce and mitigate as far as practicable, potential impacts to commercial fishers during the lifetime of Morven North and Morven South.
 - The Applicant will apply advisory safety distances during works that are appropriately sized and limited in duration, having regard to safety requirements and practical considerations, and will avoid imposing distances that are unnecessarily large or prolonged.
 - Safe working practices underpinned by appropriate safety management systems are expected from all vessels undertaking operations related to Morven North and Morven South. Vessels employed by the Applicant will only undertake activities prescribed in their line of work.
 - The Applicant will provide local fishers with procedures for registering claims for loss of/damage to fishing gear resulting from offshore works associated with Morven North and Morven South construction activities and during the O&M phase of Morven North and Morven South.
 - Vessels involved in the construction and O&M of Morven North and Morven South, including guard vessels and construction vessels, will be provided with the relevant lines of communication (as outlined within this FMMCP) to reduce disruption to commercial fishing vessels undertaking their normal activities.

3.3 Designed-in mitigation measures

- 3.3.1.1 As part of the Morven North and Morven South design process, a number of measures have been adopted to reduce the potential for impacts on commercial fisheries (see Table 3.1). The term 'designed-in measure' is used to include the following measures:
- Measures included as part of the design of Morven North and Morven South. These include modifications to the location or design of Morven North and Morven South, which are integrated into the application for consent. These measures are referred to as 'primary – designed-in measure'.
 - Measures required to meet legislative requirements, or actions that are generally standard practice used to manage commonly occurring environmental effects. These measures are referred to as 'tertiary – designed-in measure'.

Table 3.1: Designed-in measures adopted as part of Morven North and Morven South

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
MM-1	Development of and adherence to a Scour Protection Management Plan (Volume 4, Annex 1.3: Scour Protection Management Plan (Version 1)).	There is the potential for scouring of seabed sediments to occur due to interactions between metocean regime (wave and currents) and foundations or other seabed structures. This scouring can develop into depressions around the structure. The use of scour protection around offshore structures and foundations will be employed, as described in Volume 1, Chapter 3: Project Description. The SPMP will set out the approach to scour protection installation and monitoring. This will maximise protection of offshore infrastructure as far as possible during the project lifecycle.	Primary
MM-2	Development of and adherence to a Cable Plan which will include a cable burial risk assessment (CBRA) and confirm the approach to cable burial and protection monitoring throughout the operational phase.	A Cable Plan will set out the approach to protection of cables during the project lifecycle. It will reduce the risks of vessel underwater allision with cable protection, anchor or fishing gear interaction with subsea cables and interference with magnetic position fixing equipment. The Cable Plan will implement management and monitoring of cable protection (via burial or external protection where adequate burial depth, as identified via risk assessment, is not feasible) with any damage, destruction or	Primary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		<p>decay of cables notified to Maritime and Coastguard Agency (MCA), Northern Lighthouse Board (NLB), Kingfisher and UK Hydrographic Office (UKHO) no later than 24 hours after discovered. This will reduce the probability of cables becoming unburied and impacting other sea users and marine ecology receptors.</p> <p>Cable burial and protection monitoring will be undertaken throughout the operational phase to assess the status of cable burial and any deployed protection.</p> <p>A Cable Burial Risk Assessment (CBRA) will be undertaken to inform the Cable Plan. This will include a target burial depth of 1m (subject to CBRA findings), and the requirement for a minimum burial depth of 0.5m. At locations where the minimum burial depth is not achievable, cable protection may be necessary to avoid cables becoming exposed during the lifetime of Morven North and Morven South.</p> <p>The CBRA will consider relevant activities in the vicinity of inter-array and interconnector cables and confirm appropriate means of protection taking account of the final inter-array and interconnector cable. The CBRA will identify the</p>	

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		appropriate target burial depth to ensure the cable remain buried, or appropriately protected, where target burial depths cannot be achieved, for the duration of the Morven North and Morven South, to minimise the risk of interaction with other sea users or cable exposure.	
MM-3	Development of and adherence to an Operation and Maintenance Plan (OMP) that will include the requirement for any cable rock protection re-installed during the operations phase to follow industry standard guidelines for slope angle and rock grading.	The OMP will provide details of routine inspections which may be required post-construction including of inter-array and interconnector cables to ensure target burial depth is maintained. Routine inspections of cable and scour protection will be detailed, to monitor impact to physical processes and determine if remedial works are required. If secondary scour is identified, remedial works may be undertaken to both mitigate environmental impacts and to provide asset security.	Primary
MM-4	Development of and adherence to a Construction Method Statement, which will require the use of durable materials within the offshore substation platform structures, in line with appropriate design standards for offshore wind in the North Sea.	The Construction Method Statement will ensure that all works are carried out efficiently, safely, and in compliance with environmental and regulatory requirements. The Construction Method Statement (CMS) will outline the planned approach, procedures, and	Tertiary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		<p>safety measures for the offshore construction activities.</p> <p>Ensures resilience to future climate change, in particular from the risk of increased wear from sea level rise, extreme weather events and increased precipitation and changes to wind patterns.</p>	
MM-7	Development of and adherence to a Navigation Safety Plan and Vessel Management Plan	<p>ANSPVMP will be developed to reduce the risk introduced due to the presence of Morven North and Morven South vessels. The NSPVMP will describe the measures related to navigational safety, including information on Safety Zones, charting, construction buoyage, temporary lighting and marking and means of notification of Morven North and Morven South activity to other sea users (e.g. via Notices to Mariners). It will confirm the types and numbers of vessels engaged in Morven North and Morven South and consider vessel coordination, including indicative transit route planning.</p> <p>To ensure Morven North and Morven South vessels are suitably managed to reduce the likelihood of involvement in incidents and maximise the ability to assist in the event of a third-party incident.</p>	Primary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		<p>The NSPVMP will include the requirement for Morven North and Morven South vessels to comply with international marine regulations as adopted by the Flag State, including the International Regulations for Preventing Collisions at Sea (COLREGs) (International Maritime Organization (IMO), 1972/77) and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974) through the NSP and VMP.</p>	
MM-11	<p>Timely and efficient distribution of information via Notice to Mariners, Kingfisher notifications and other navigational warnings of the position and nature of works.</p>	<p>To ensure other sea users and marine infrastructure receptors are aware of Morven North and Morven South, to allow relevant vessels to plan passage and thereby reduce potential for allision.</p>	Tertiary
MM-15	<p>Development of and adherence to a Development Specification and Layout Plan (DSLPL).</p>	<p>The DSLP will confirm final layout and design of Morven North and Morven South. This will be agreed in consultation with the MCA and NLB and will ensure the final layout of Morven North and Morven South is suitable for both surface and air based (for Search and Rescue purposes) navigation and to ensure accurate mapping for navigation, and to ensure compliance with Marine Guidance Note 654.</p>	Primary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
MM-18	Development of and adherence to a Fisheries Mitigation, Monitoring and Communication Plan.	<p>The FMMCP will detail the Applicant's proposed approach to mitigation, compensation and fisheries liaison, and facilitation of coexistence.</p> <p>The FMMCP will include details of the measures which are proposed to be implemented to reduce impacts on commercial fishing, the approach to monitoring fisheries activity and the approach to fisheries liaison and procedures to manage interactions between Morven North and Morven South and the fishing industry.</p>	Tertiary
MM-19	To appoint a Company Fisheries Liaison Officer (CFLO).	The Company Fisheries Liaison Officer will support ongoing liaison and ensure clear communication between the Applicant and commercial fishers. They will provide a point of contact to liaise and engage with the fishing industry and to facilitate productive relationships with commercial fishers.	Tertiary
MM-20	Installation of infrastructure over or adjacent to existing cables will be subject to crossing or proximity agreements between Morven North and Morven South and other parties, prior to the start of the construction phase.	To ensure close communication and planning between both parties to ensure disruption of activities is reduced and coexistence is facilitated.	Tertiary
MM-21	Member of and engagement in Regional Commercial Fisheries working groups.	Participation in the East Region Commercial Fisheries Working Group (or equivalent) and liaison	Tertiary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		with Fisheries Industry Representatives, as appropriate and adherence to recognised fisheries liaison good practice.	
MM-22	Consideration of the principle of Cooperation Agreements in instances where static gears may be required to be temporarily relocated.	To reduce potential adverse interactions between Morven North and Morven South and fishing activities	Tertiary
MM-23	Development of and adherence to a Decommissioning Programme.	As required under Section 105 of the Energy Act 2004 (as amended by the Energy Act 2008 and the Scotland Act 2016). A decommissioning programme will consider best practice at the time of decommissioning.	Tertiary
MM-33	An application for the use of Safety Zones of up to 500m during construction, periods of major maintenance, decommissioning and up to 50m for installed structures pre-commissioning.	To protect third-party vessels from Morven North and Morven South vessels involved in construction and major maintenance activities, which may be Restricted in their Ability to Manoeuvre.	Tertiary
MM-34	Development of and adherence to a Lighting and Marking Plan (LMP)	The LMP will detail compliance with legal requirements including IALA G1162 (IALA, 2021), and will assist with Search and Rescue operations and will ensure that appropriate lighting and marking of wind turbines and offshore substation platforms will be established in accordance with Civil Aviation Authority regulations and guidance (CAP 393 and the Air Navigation Order) and the Defence	Primary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
		<p>Infrastructure Organisation, which is responsible for the safeguarding of Ministry of Defence assets.</p> <p>The approach to Aids to Navigation will be outlined in the LMP.</p> <p>Adopting the LMP, and therefore reducing lighting to be compliant with MM-34, will provide the minimum amount and intensity of lighting that Morven North and Morven South can legally have whilst remaining compliant with mandatory Health and Safety lighting requirements.</p>	
MM-37	Appropriate marking on UKHO Admiralty charts.	To maximise awareness of Morven North and Morven South, allowing other vessels, sea users and marine infrastructure receptors to plan their activities in advance.	Tertiary
MM-38	The construction and decommissioning area is marked by buoyage in agreement with the Northern Lighthouse Board.	To protect third-party vessels from Morven North and Morven South vessels involved in construction and major maintenance activities which may be Restricted in their Ability to Manoeuvre.	Tertiary
MM-39	Use of guard vessels as required.	To reduce potential conflict between Morven North and Morven South and fishing activities by maximising awareness of temporary hazards.	Tertiary

Reference number	Designed-in measures adopted as part of Morven North	Justification	Primary or tertiary
MM-48	Any objects dropped on the seabed during works associated with Morven North and Morven South will be reported in line with MD-LOT procedures, as set out in the EMP, and objects will be recovered where they pose a hazard to other marine users and where recovery is practicable.	Reporting of dropped objects is standard and follows Marine Directorate procedure to decrease the risk of fishing gear snagging:	Tertiary

3.4 Cooperation Agreements

3.4.1 Rationale for the application of Cooperation Agreements

- 3.4.1.1 As set out in Table 3.1, the Applicant will consider use of Cooperation Agreements in instances where static gears may be required to be temporarily relocated as a result of construction activity in Morven North and Morven South.
- 3.4.1.2 Cooperation Agreements - which may also be referred to as disruption agreements – are formal agreements between the Applicant and a fisher that seek to mitigate justifiable disturbance experienced by fishers through loss of access to fishing grounds due to construction activities in Morven North and Morven South. Agreements may be supported by monetary payment for demonstrable loss of fishery access or economic disadvantage caused directly to active fishing vessels by disturbance or displacement by Morven North and Morven South. Cooperation Agreements are broadly acknowledged to be an appropriate and pragmatic mechanism for mitigating short-term and temporary loss of access impacts experienced by static gear fishing fleets.
- 3.4.1.3 In the instance that any Cooperation Agreement is deemed appropriate, this section sets out the procedures that will be followed in its application. The Applicant has in place, an established disruption payment procedure, and this will be adhered to.
- 3.4.1.4 Evidence-based Cooperation Agreements with fishers shall only be implemented as a last resort where residual impacts persist despite the application of all other reasonable Designed-In Measures. Cooperation Agreements shall include clearly defined protocols for how the parties (i.e. the Applicant and the affected fisher) will act during the construction period of Morven North and Morven South and, where supported by an appropriate evidence base, a mechanism for payments designed to ensure that affected fishers are neither financially worse nor better off, as a result of Morven North and/or Morven South activities.
- 3.4.1.5 Cooperation Agreement payments will only be established based on justifiable claims of financial losses, to achieve a position whereby fishing interests are neither advantaged nor disadvantaged. Affected fishermen will be required to provide evidence to corroborate any disruption claims. Payments will be considered for justifiable claims submitted by individuals only, ensuring that those who are impacted will receive fair payment in line with evidenced financial losses; the Applicant will not consider association agreements.
- 3.4.1.6 If mutual agreement cannot be reached, both parties should seek to undertake Alternative Dispute Resolution (ADR) in accordance with recognised good practice principles for dispute resolution within the offshore wind and commercial fisheries context.

3.4.2 Procedure for a Cooperation Agreement

- 3.4.2.1 All claims must satisfy the following points:
- Claims will be paid only for financial losses caused due to the construction² of Morven North and/or Morven South.
 - There must be a causal link between the construction of Morven North and/or Morven South and the claimant's losses (e.g. due to exclusion from fishing grounds and/or disruption to normal activities).
 - All claims should be reasonable and justified based on demonstrable economic loss.

² 'Construction' in this sense refers to construction activities licensed under relevant Section 36 Consents and Marine Licences, and is considered to be inclusive of pre-construction activities that involve interaction with the seabed, such as seabed preparation.

- Evidence must be provided to support the claim.
- Payment will be paid only if business is being carried out in accordance with the relevant legislation (i.e. the vessel is licensed to operate as a commercial fishing vessel and adheres to fisheries legislation).

3.4.3 Evidence base

3.4.3.1 The following documentation and data are expected to be required to form an evidence base to support any claim for disruption payment:

- copy of certificate of registry for each vessel for which a claim is being made;
- copy of a valid MCA certification or equivalent;
- copy of the relevant vessel fishing licences and entitlements;
- sight of vessels' fishing charts or Global Positioning System plotter records to provide clear historic evidence of potential disruption in the area of the operations. Alternatively, where such data is not attainable, provide annotated admiralty charts indicating areas fished, this may be undertaken with assistance from the CFLO who will provide graphics and work with the claimant to understand the areas fished;
- evidence of monthly sales notes for the three-year time period prior to the claim;
- annual fishing accounts of the vessels concerned for a three-year time period or equivalent evidence of annual earnings (e.g. self-assessment tax return);
- monthly fishing vessel landings data or and/or fisheries landings data held by fisheries authorities (requiring declaration from vessel owner for release of individual records).

3.4.3.2 The purpose of the evidence base is to document active fishing across the area of works and demonstrate the level of economic loss that is expected over the period of construction works.

3.5 Good practice measures

3.5.1 Overview

3.5.1.1 The Applicant is committed to employing industry standard good practice measures during all phases of Morven North and Morven South. Those measures relevant to fisheries coexistence are described below.

3.5.2 Code of good practice for contracted vessels

3.5.2.1 When the Applicant appoints contractors, these will be contractually required to follow a code of good practice to ensure any external communication to other marine users, including fishers, is accurate, and to aid coexistence with the fishing industry. This will include the following considerations:

- ensure all vessels under contract for Morven North and Morven South adhere to Convention on the International Regulations for Preventing Collisions at Sea ((COLREGs); International Maritime Organization, 1972) and The International Convention for the Safety of Life at Sea ((SOLAS); International Maritime Organization, 1974) requirements;
- ensure all vessels working under contract for Morven North and Morven South do not engage in any commercial or recreational fishing activities;
- all vessels under contract for Morven North and Morven South will maintain collaborative, proactive and professional communications with fishing vessels during offshore operations;
- all vessels under contract for Morven North and Morven South will monitor, at all times, the required Very High Frequency channels so as to receive communications directly from fishing vessels;
- all vessels under contract for Morven North and Morven South will adhere to sensible transit speeds, exercise caution and maintain observation during night working;

- all vessels contracted to undertake specific work for Morven North and Morven South will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gears.

3.5.3 Navigational safety measures

Cable burial

- 3.5.3.1 Cable burial is the preferred means of cable protection. The target cable burial depth for Morven North and Morven South will be 1m, subject to the findings of the CBRA. Details of planned cable burial will be confirmed in the CaP to be prepared by the Applicant and approved ahead of the construction of Morven North and Morven South. The CaP will be informed by the CBRA and will provide detail on the final routing on the seabed of all cables, confirming target cable burial and protection measures where target burial cannot be achieved. The CaP will also set out an approach to surveys of cables and any protection during the operational life of Morven North and Morven South, and measures to be taken in the event of cable exposure. SFF's preference for rock placement as a means of cable protection (rather than, for example, concrete mattresses) is noted by the Applicant and will be taken into account where possible in preparing the CaP.

Safety Zones

- 3.5.3.2 The Applicant will apply for Safety Zones. Temporary Safety Zones of up to 500m will be sought during construction, major maintenance, and decommissioning phases. Where appropriate, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances, as defined by risk assessment, to mitigate any impact which poses a risk to surface navigation during construction, O&M, and decommissioning phases.
- 3.5.3.3 During the construction and decommissioning phases, Morven North and Morven South will be marked as a buoyed construction area. There will be no restriction on entry into the buoyed construction area other than through any active Safety Zones, noting the Cardinal Marks (buoys) do advise Mariners to avoid the area.
- 3.5.3.4 Safety Zones and buoyed areas will be communicated to other marine users via Notice to Mariners (NtMs).

Vessel transit routing and shelter areas

- 3.5.3.5 Morven North and Morven South related vessel activity will be managed by the Marine Coordinator via a Permit to Work system, which in essence is a health and safety management tool that requires obtaining permission, assessing risks and implementing necessary precautions before entering a works area and carrying out specific activities offshore. Once the location of Morven North and Morven South working port(s) is confirmed, indicative vessel transit routes to and from the works area will be identified (in the NSPVMP, which will be subject to consultation with the SFF prior to its approval) and vessels will adhere to these routes wherever possible. Vessel anchorage areas, and areas to be avoided, will also be identified and contractors will be instructed to comply.
- 3.5.3.6 The designation of preferential shelter areas³ does not over-ride the authority of any vessel master to take whatever navigational decisions are required for the safe operation of that vessel and other sea users.

³ In the context of the FMMCP, shelter area refers to a geographically defined sea area that offers protection from adverse weather and sea conditions, where an offshore construction vessel can safely remain, manoeuvre, or seek refuge while maintaining acceptable limits of wave height, wind, and current for the vessel's design and operational capabilities.

- 3.5.3.7 It is also recognised that static fishing gear may be located anywhere off the east coast and there is no expectation that indicative transit routes or shelter areas will be cleared of static fishing gear. As such, contracted vessels associated with Morven North and Morven South are always required to maintain a lookout for, and avoid, appropriately marked fishing gear.

3.5.4 Marking and charting

- 3.5.4.1 During the construction phase, Morven North and Morven South construction areas will be clearly marked using buoys. All construction vessels and installed offshore infrastructure will be appropriately lit and marked. All installed offshore infrastructure will be marked on UKHO Admiralty Charts.

Dropped objects

- 3.5.4.2 The requirement to set out procedures relating to dropped objects will be set out in the relevant conditions of the Section 36 consent and associated Marine Licences, particularly the requirement to prepare, for approval, an EMP. The EMP confirms that any objects dropped on the seabed during works associated with Morven North and Morven South will be reported, and objects will be recovered where they pose a hazard to fishing or safe navigation, and where recovery is practicable. Further details on the dropped objects reporting procedure will be provided in the EMP. All Contractors will be required to comply with the approved EMP.
- 3.5.4.3 Should the dropped object pose a navigational risk, a NtM and Kingfisher Notice will be issued once the location, and details of the object can be established.

Cable protection surveys

- 3.5.4.4 Cable burial and protection monitoring will be undertaken throughout the O&M phase to assess the status of cable burial and any deployed protection. Survey outcomes will be shared with the fishing industry where relevant to informing ongoing coexistence. The nature and extent of this monitoring will be determined within the CaP and O&M Plan (OMP) following confirmation of final cable installation plans.

Procedures specific to fisheries interactions

Procedure in relation to gear fastening or loss

- 3.5.4.5 The Kingfisher Information Service - Offshore Renewable and Cable Awareness project (KIS-ORCA) is a joint initiative between Subsea Cables UK and RenewableUK and is being managed by the Kingfisher Information Service of Seafish. Details of Morven North and Morven South physical infrastructure will be provided within KIS-ORCA data, which should be downloaded onto a vessel's fishing plotter. To reduce the risks of fishing near offshore structures, it is essential to be up to date with KIS-ORCA information.
- 3.5.4.6 As per the Seafish *et al.*, (2016) guidance on reducing the risks while fishing:
- “In the interests of fishing safety and to prevent damage to subsea structures, fishermen are advised to exercise caution when fishing in the vicinity of subsea cables and renewable energy structures. If it is suspected that gear has snagged a subsea cable, DO NOT endanger vessel and crew by attempting to recover gear. If gear is snagged and it is thought prudent to slip or cut the fishing gear in an attempt to clear a subsea structure, the gear should always be lowered to the seabed first. To slip or cut anything bearing excessive weight should never be attempted”.
- 3.5.4.7 The following procedure replicates that which has been in place in respect of the UK offshore oil and gas industry. It reflects Seafish and KIS-ORCA guidance and describes the steps that should be undertaken in the event of fishing gear becoming fastened within the boundaries of Morven North and Morven South:

- If the fastened gear is not easily retrieved, fishermen should not apply excessive winch, line or net hauler loads or engine powers in attempts to retrieve fastened gear.
- Fishing vessel should advise the HM Coastguard or the Marine Coordinator, giving an accurate position of the vessel and/or lost gear.
- If the coastguard or the Marine Coordinator confirms that the vessel is in the immediate vicinity of a cable, serious consideration will be given to the slipping of the gear and buoying and recording its position.
- After buoying off the gear, the position should be confirmed with the coastguard or the CFLO.
- On return to port, the local Fishery Office should be contacted, and the incident registered in the normal manner.
- On no account should skippers grapple in an attempt to recover fishing gear lost or cut away in the vicinity of the cables associated with Morven North and Morven South.

3.5.4.8 The following procedure, based on the same sources of guidance as referenced above, should be followed in the event of fishing gear becoming lost or damaged within the boundaries of Morven North and Morven South:

- On discovery of the lost or damaged gear at sea, the fisherman must record the date, time, location (coordinates) and description of the gear lost, or the damages sustained within the vessel logbook.
- On return to port, the fisherman must report the incident to the CFLO within five days and if possible, provide photos of the damaged gear.
- Once the CFLO has been informed of the incident, the CFLO will provide a gear loss or damage claim form to the fisherman. The fisherman will be asked to complete the fishing gear loss or damage claim form which will provide the relevant details for assessment of the likely cause of the loss of or damage to the gear, the value of the lost or damaged fishing gear and any subsequent loss of earnings which were incurred as a result of the incident.
- Once completed, the fishing gear loss or damage claim form should be sent to the CFLO as soon as possible after the incident. This should be supported with photographs of the damaged fishing gear, evidence of the earnings from fishing at the time of the incident, and a quote for the cost of repair or replacement of the gear, whether undertaken by a third-party or by the vessel's crew.
- Following the receipt of this fishing gear loss or damage claim form, the Applicant will review the information provided and carry out appropriate further investigations. The Applicant will respond to the claim via their CFLO as soon as possible.

3.5.4.9 Claims for loss or damage to fishing gear will not be considered where a skipper of a vessel has ignored notices, guard vessel communications, NtM, CFLO communications, infringed Safety Zones, or in any other circumstances where the damage to or loss of the gear is as a result of the neglect or default of the skipper of a vessel.

Procedure for gear relocated/removed by gear owner

3.5.4.10 During the construction and O&M phases of Morven North and Morven South, Safety Zones around construction and O&M works will be determined and communicated to the commercial fishing industry. The owner of gear within the offshore Safety Zones and works areas will be requested by the Applicant and/or its related parties or its contractors to relocate or remove gear from within the Safety Zone provided that:

- Safety Zones are communicated to the affected recipients within a reasonable period to allow gear to be relocated/removed prior to works being undertaken;
- the gear owner is reimbursed for reasonable and evidenced costs associated with relocation or removal of gear, in accordance with an evidence-based approach.

4 Fisheries monitoring

4.1 Rationale for and approach to monitoring

- 4.1.1.1 Commercial fisheries monitoring is proposed to support an improved understanding of how fishing activity may respond to the presence of Morven North and Morven South in combination with other offshore wind developments in the region. This monitoring is proposed in recognition of the scale and complexity of potential cumulative effects on commercial fisheries receptors, and the current limitations in the publicly available evidence base relating to long-term changes in fishing activity in areas subject to multiple offshore wind developments, including floating offshore wind farms.
- 4.1.1.2 The assessment of Morven North and Morven South alone identifies no significant effects on commercial fisheries in EIA terms. Accordingly, Morven North and Morven South in isolation are not the driver for the monitoring proposed in this section. Rather, monitoring is proposed to acknowledge the potential value of strategic, coordinated monitoring at a regional scale to support validation of the cumulative effects assessment and to contribute to a wider evidence base. The Applicant's contribution to such monitoring would be proportionate to the limited contribution of Morven North and Morven South to cumulative effects.
- 4.1.1.3 The Applicant recognises that the design and implementation of effective commercial fisheries monitoring in the context of cumulative offshore wind development is best undertaken through a holistic and inclusive regional approach, rather than through isolated project-specific monitoring programmes. Monitoring arrangements will therefore be developed collaboratively, where appropriate, with other offshore wind developers and relevant stakeholders.
- 4.1.1.4 In this context, the Applicant commits to engaging with the East Region Commercial Fisheries Working Group (or equivalent) and other relevant parties to contribute to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring. This approach would seek to make appropriate use of existing data sources and industry knowledge to improve understanding of spatial and temporal patterns in commercial fishing activity over time, in a manner that is consistent across developments and proportionate to the scale of effect.
- 4.1.1.5 Participation in any strategic monitoring initiative will be proportionate and non-substitutive, such that the withdrawal or non-delivery of individual projects from a group initiative would not result in additional monitoring obligations being placed on remaining developments.
- 4.1.1.6 Monitoring outputs may be used, where relevant, to inform future iterations of the FMMCP, subject to consultation and agreement. The scope, methodology, duration and governance of any monitoring will be determined through this collaborative process and will reflect relevant guidance, the evolving evidence base, and the cumulative development context.
- 4.1.1.7 The proposed approach aligns with Scottish Government guidance on commercial fisheries monitoring and responds to evidence gaps identified through ScotMER (Scottish Government, 2022c) relating to commercial fishing activity in the vicinity of offshore wind farms and associated infrastructure.
- 4.1.1.8 Proposed Applicant monitoring commitments are presented in Table 4.1.

Table 4.1: Monitoring commitments for commercial fisheries

Potential environmental effect	Monitoring commitment	Means of implementation
<p>Cumulative reduction in access to, or exclusion from established fishing grounds</p> <p>Cumulative displacement leading to gear conflict and increased fishing pressure on adjacent grounds</p>	<p>Contribution to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring to support understanding of cumulative effects.</p>	<p>Engagement with the East Region Commercial Fisheries Working Group (or equivalent) and relevant stakeholders to inform the scope, data sources, and governance of monitoring; implementation through the FMMCP, where appropriate and proportionate.</p> <p>Monitoring scope, datasets, duration and reporting arrangements will be defined collaboratively and subject to agreement with MD-LOT following engagement with relevant stakeholders.</p>

5 Communication

5.1 Principles of liaison

- 5.1.1.1 The Applicant regards coexistence as the presence of both industries (offshore wind and commercial fisheries) within and around the Morven North Boundary and Morven South Boundary. Use of the term coexistence does not imply full compatibility, acceptability, or the absence of interaction between the two sectors. An approach of avoiding and reducing impacts to the fishing industry is regarded as the most sustainable approach to coexistence, and the Applicant considers effective communication and information transfer to be a key mechanism for coexistence.
- 5.1.1.2 This section sets out the roles and responsibilities that the Applicant and key contractors will adopt to support its commitment to coexistence, including the appointment of a CFLO, OFLOs, and Fishing Industry Representatives (FIR²s) as necessary.

5.2 Roles and responsibilities

- 5.2.1.1 Details of the roles and responsibility of the Applicant and its future contractors, as far as relevant to this FMMCP, are detailed in Table 5.1, with an organogram of key liaison roles provided in Figure 5.1.
- 5.2.1.2 The roles described within this section relate to fisheries liaison and marine coordination functions only and do not supersede statutory responsibilities of vessel masters or applicable maritime legislation.

Table 5.1: Core roles and responsibilities of the Applicant and its contracted parties in relation to the Fisheries Mitigation, Monitoring and Communication Plan

Role	Responsibility
The Applicant	The Applicant has overall responsibility for the FMMCP.
Project Director	Responsible for requiring sufficient resources and processes are in place to deliver the FMMCP.
Development Team	Liaising with CFLO, OFLO and FIR ² s; Facilitating any updates to the FMMCP; Ensuring delivery of monitoring outputs.
Contractors and Subcontractors	Work with the Applicant to implement the FMMCP, where applicable to their scopes.
CFLO	Provide the Applicant with support and guidance regarding communication and coexistence with the fishing industry.
FIR ²	Work with the CFLO and the Applicant to provide support and guidance regarding the fishing industry.
OFLO	Communication point between the Applicant's contractors and the fishing industry on site during offshore works.

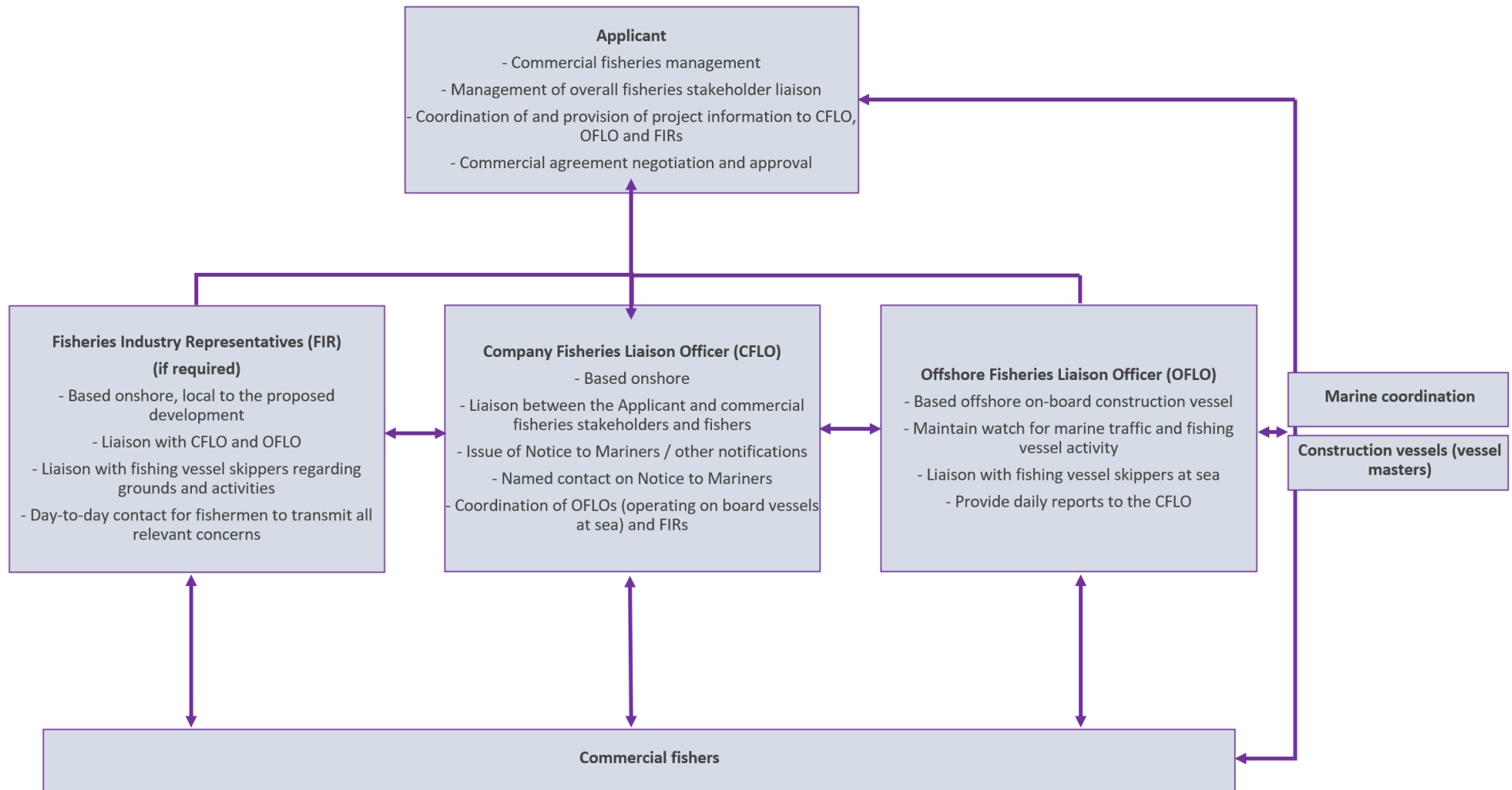


Figure 5.1: Applicant team organogram

5.2.2 The Applicant

5.2.2.1 The responsibilities of the Applicant in relation to this FMMCP are:

- progress the construction of Morven North and Morven South with the least disturbance practicable to the local fishing activities;
- maintain the ongoing employment of a CFLO and OFLO (as required when there is offshore works that could interact with existing fishing activities) throughout the lifetime of Morven North and Morven South;
- aid in the prevention of conflict through the timely provision of information to the CFLO, FIR² and the fishing industry, including in relation to boulder relocation, cable laying, the type and location of cable protection measures where this may be required, and the timing of construction works;
- produce and ensure implementation of Standard Operating Procedures (SOPs) to reduce and appropriately manage potential interactions with fishing vessels;
- establish suitable and evidence-based cooperation agreement methodologies in line with FLOWW guidelines (and forthcoming updates to that guidance).

5.2.3 Company Fisheries Liaison Officer

5.2.3.1 Brown and May Marine are currently the appointed CFLO for Morven North and Morven South. The CFLO reports to the Applicant's Development Team. The CFLO will liaise regularly with the OFLOs and FIR²s as required.

5.2.3.2 The CFLO's duties will include:

- preparing and maintaining a Morven North and Morven South-specific register of local fisher's groups and associations;
- engaging in consultation with the fishing community to understand any concerns with Morven North and Morven South and associated survey and construction activities;
- arranging or attending as necessary fisheries meetings (with local fishers, fisheries associations) to:
 - promulgate information on the design envelope, construction programme, and provide updates on any changes to Morven North and Morven South throughout the pre-construction phase;
 - gather fishers' views on effects of projects on their working practices;
 - work with fishers to resolve any issues or conflicts arising where practicable.
- provide advice to the Applicant on fisheries liaison throughout the construction and O&M phases of Morven North and Morven South;
- develop and maintain a strong positive working relationship with the local fishing industry;
- have and maintain a strong knowledge of the fishing industry local to Morven North and Morven South;
- understand the interactions likely to occur between the local fishing industry and Morven North and Morven South, and any potential impacts on the fishing industry during construction and O&M phases of Morven North and Morven South;
- ensure that information is made available and circulated in a timely manner to reduce interference with fishing operations and other users of the sea;
- maintain availability to receive and respond to fisheries stakeholders and Applicant enquiries, including resolution of fisheries related issues as they arise.

5.2.3.3 In line with the above responsibilities, the main duties of the CFLO are to:

- maintain the fisheries stakeholder database that contains information on fishing vessel operations (e.g. vessel name, registration and port base, and skipper) within and around Morven North and Morven South;
- organise, prepare updates and attend fisheries meetings, local fisheries stakeholder events and meetings with regulators, as required;

- prepare and distribute the required information and notices of all activities associated with Morven North and Morven South which could affect fishing stakeholders;
- instruct contractors on the fishing activities in the areas of work and provide details on the fishing activities and gear types that may be present, any relevant sensitivities and contact details for communicating with the fishing vessels at sea;
- manage and coordinate OFLOs that are supporting works at sea, including liaising on any fisheries issues at sea, such as facilitating the relocation or removal of static fishing gear where this may be required;
- communicate details of any dropped objects to the fishing industry. Dropped objects should be reported to stakeholders within 24 hours of the event occurring (or otherwise as soon as practicable);
- communicate details of exposed cables and any other safety hazards to the fishing industry;
- coordinate the activities and responsibilities of the FIR²s (if required);
- provide monthly reporting to the Applicant's Environmental Manager during the construction phase of Morven North and Morven South.

5.2.3.4 In addition, the CFLO will assist the Applicant should there be a need for financial arrangements, such as Cooperation Agreement payments for fishers if requests for the temporary movement of static gear are made. This process will need to be carried out according to recognised standards throughout the UK territorial waters. The CFLO should always act professionally and not make any disclosures or commitments regarding financial arrangements without the Applicant's approval.

5.2.3.5 It should be noted that the CFLO is shore-based, typically working standard office hours, and is therefore not the appropriate point of contact for any offshore, non-emergency fisheries related incident which requires an immediate or very short-term response. Contact in any such non-emergency incident should initially be made with the OFLO at the time, who together with the vessel master can provide a response 24 hours per day. Details of how to contact the OFLO are included in all NtMs from the Applicant.

5.2.3.6 If the incident is an emergency at sea, the fishing vessel should contact the coastguard through the normal channels.

5.2.4 Offshore Fisheries Liaison Officer

5.2.4.1 When required, the Applicant will utilise suitably qualified OFLOs throughout the construction and O&M phases of Morven North and Morven South. This will ensure that key vessels associated with Morven North and Morven South include suitably skilled and experienced OFLOs who have relevant local knowledge of the fisheries which could be affected.

5.2.4.2 The primary responsibility of the OFLO is to act as an effective communication point between the Applicant's contractors and the fishing industry on site during offshore works. The OFLO will be the first point of contact for fishers at sea while activities are taking place. The OFLO will be in communication with the Applicant's commercial fisheries manager and the CFLO in order to communicate with the local fishing industry about the ongoing activities.

5.2.4.3 OFLOs will be deployed on the survey or construction vessel undertaking the relevant offshore works, where liaison is most effective. Deployment of an OFLO on a guard vessel will only occur where placement on the working vessel is genuinely unavoidable. This approach ensures that real-time communication between the working vessel and fishing vessels is maintained and that the effectiveness of the liaison function is not diminished.

5.2.4.4 The primary responsibilities of the OFLOs are to:

- maintain regular contact with the CFLO and the Applicant's personnel, contractors and subcontractors, as required, concerning vessel traffic and fishing vessel activity in the vicinity of Morven North and Morven South;
- maintain watch for vessel traffic and fishing vessel activity during marine operations and maintain regular contact with guard vessels and support vessels;

- communicate with the vessel master in respect of providing any relevant information on fishing vessels, and, when a Morven North and Morven South related vessel is not engaged in marine operations, work with the vessel master to avoid, where reasonably practicable, any fishing vessels actively engaged in fishing operations;
- liaise with any fishers who may have static gear deployed in the vicinity of Morven North and Morven South or along vessel transit routes;
- provide the required support to the CFLO in the handling of any claims by fishers who may have static gear deployed in the vicinity of Morven North and Morven South;
- work with the vessel master to ensure adherence with relevant aspects of the FMMCP;
- develop and provide training for all vessel personnel to include induction and training for staff with specific fisheries liaison responsibilities;
- record details of any fishing activity in and around Morven North and Morven South (including fishing vessels, gear and communications with fishers) and of any events of infringement or movement or damage to static gear;
- when engaged in OFLO duties, provide daily update reports via email to the CFLO;
- attend meetings, when required, with the Applicant's personnel and the CFLO.

5.2.5 Fishing Industry Representatives

5.2.5.1 To further aid the establishment of effective communication channels and to benefit from extensive local knowledge, one or more FIR² (s) may be employed. FIR²s can be helpful when communicating information across a wide geographic area to assist the CFLO in delivering face-to-face information dissemination. A FIR² will support activities that would otherwise be undertaken by the CFLO (if a FIR² is not in position). FIR²s may be employed to engage with fisheries within a particular geographical area, or have specialist knowledge of certain types of fishing activity.

5.2.5.2 FIR²s will make skippers of fishing vessels aware of any forthcoming operations and other ongoing activities related to Morven North and Morven South. The roles and responsibilities of the FIR² and CFLO can be very similar and while the roles are often delivered by one individual dependent on knowledge and resource requirements, the Applicant will seek to keep these roles separate.

5.2.5.3 The primary responsibilities of the FIR²s are to:

- liaise with fishing skippers with the objective to provide details of fishing activities in the area and particular sensitivities;
- maintain mutually productive relationships between the Applicant and fisheries stakeholders;
- be the local conduit for liaison, providing the day-to-day point of contact for fishers to transmit all their relevant concerns in relation to activities associated with Morven North and Morven South;
- log all concerns raised by the fishers, including date, individual and details related to the type, nature and location of the concern and regularly provide this log to the CFLO;
- assist the CFLO at a local level in undertaking the tasks listed above, including:
- assist the Applicant's representatives to identify areas of concern or conflict at an early stage so that as far as is practicable appropriate measures can be implemented to address these;
- assist with the liaison between OFLOs and CFLO where necessary, including liaising on any fisheries issues at sea;
- assist in the distribution of notices and relevant Morven North and Morven South information to local fisheries stakeholders;
- regularly update the contacts database;
- maintain availability as required for addressing local fisheries issues if they arise.

5.2.5.4 The FIR² (s) will be contracted by the Applicant or CFLO, and subject to a Terms of Reference and contract Terms and Conditions. While a FIR² may be associated with a specific organisation or association, they will not be acting to the sole benefit of that association. Should an instance arise whereby an industry association or individual fishers does not wish to communicate via the FIR² for that area, the CFLO will undertake such direct responsibilities to ensure that the association/fishers still has a line of communication to the Applicant and vice versa.

5.2.6 Supporting functions

Guard vessels

- 5.2.6.1 During construction and O&M, Morven North and Morven South may have guard vessel(s) on site. The role of the guard vessel(s) is to facilitate safe construction through liaison with other sea users in the vicinity of the works.
- 5.2.6.2 Guard vessel(s) will also be in regular communications with the OFLO and CFLO to exchange information on fishing activity and any static fishing gear in the vicinity of Morven North and Morven South. The OFLO will normally be deployed on the survey or construction vessel undertaking offshore works. Deployment of an OFLO on a guard vessel will only occur where placement on the working vessel is not reasonably practicable.

Construction vessels

- 5.2.6.3 During pre-construction, construction, O&M and decommissioning activities, vessels engaged in works at Morven North and Morven South will operate in accordance with applicable maritime legislation and the relevant provisions of this FMMCP. The master of each vessel will retain overall responsibility for safe navigation and vessel operations. Construction vessels will, as appropriate and where reasonably practicable, maintain awareness of fishing activity in the vicinity of the works, communicate with fishing vessels where necessary, facilitate the deployment of an OFLO in accordance with this FMMCP, and cooperate with the OFLO, CFLO and Marine Coordinator in relation to fisheries liaison, incident reporting and the management of potential interactions with fishing vessels and static fishing gear.

Marine coordination

- 5.2.6.4 In addition to the CFLO, FIR²(s) and OFLOs, a Marine Coordinator for Morven North and Morven South will be appointed. The Marine Coordinator will ensure the marine coordination function is delivered continuously (i.e. 24/7). The Marine Coordinator coordinates all marine operations relating to Morven North and Morven South; including monitoring and managing all construction vessel activity. For dissemination of Morven North and Morven South activity information to other vessels offshore in the vicinity of Morven North and Morven South, including fishing vessels, the Marine Coordinator shall act as the principle point of reference for the CFLO/ FIR²s/OFLOs, and shall be a point of contact for vessels navigating close to Morven North and Morven South.

5.3 Ongoing engagement

- 5.3.1.1 Throughout all phases of Morven North and Morven South, the Applicant will remain committed to maintaining open dialogue and effective communications with the fishing industry. This is key to supporting the Applicant's commitment to coexistence where possible to enable both Morven North and Morven South and the relevant commercial fisheries to manage works through awareness of upcoming activities, for example notification of planned construction works.
- 5.3.1.2 Different methods of communication will be used to promulgate Morven North and Morven South information to the fishing industry. The Morven North and Morven South information to be communicated and the methods of communication are summarised in Table 5.2.
- 5.3.1.3 The Applicant is supportive of the SFF-led Horizon Watch⁴ initiative, an information bulletin intended to assist Scottish fishermen by providing advance awareness of proposed subsea cable routes and other installations. The Applicant recognises that the initiative has to date been focused on

⁴ <https://www.sff.co.uk/horizon-watch-downloads>

communicating locational information for subsea cable proposals and, as such, may have limited direct relevance to the Morven North and Morven South array areas. The Applicant will continue to monitor the development of Horizon Watch and engage with the initiative where it is considered appropriate.

Table 5.2: Morven North and Morven South fisheries communication methods

Communication method	Information promulgated
NtM Kingfisher Bulletin	A NtM will be issued to provide information such as the nature of activity, location and vessels involved prior to the commencement of new activities. The NtM will be circulated to the local distribution list, uploaded to the Kingfisher Bulletin and made available on the Applicant's website 14 days in advance of the commencement of new activities, where possible. The CFLO will further distribute this NtM to the fisheries distribution list. NtMs will include information on vessels, their operators and contact details etc. planned to engage in activities throughout works.
Surveys which may require gear relocation or may cause disruption to fishing activity	Notices and information distributed to affected fishers via CFLO prior to survey mobilisation.
Dropped Objects	In the event of a dropped object offshore, the Applicant will notify MD-LOT as soon as practicable after becoming aware of the event. Should the dropped object pose a hazard to fishing or navigational safety, a NtM will be issued once the location, and details of the object can be established. Furthermore, the Applicant will issue a 'dropped objects' form to MD-LOT and other relevant stakeholders as required (including the SFF), in the template issued by the MD-LOT, as soon as reasonably practicable following the event. Any further steps as required in consultation with MD-LOT will be notified through an NtM where applicable.
Regional CFWG meetings	Regular meetings, with frequency to be determined in a future CFWG Terms of Reference, at which the Applicant can provide updates on Morven North and Morven South and engage with stakeholders on strategic, regional issues, including cumulative effects and the development of proportionate, regionally coordinated approaches to commercial fisheries monitoring.
Marine Coordination	The Marine Coordinator will provide a direct point of communication for fishing vessels when active in areas relevant to Morven North and Morven South. Fishers can contact the Marine Coordinator via marine radio channels or the Marine Coordinator phone line.
Unscheduled and ad hoc liaison	Additional unscheduled liaison and consultation will be undertaken by either the CFLO, OFLO or the FIR ²

Communication method	Information promulgated
	as required to address issues and fisher’s concerns as they arise.

- 5.3.1.4 Example day-to-day liaison scenarios are presented in Figure 5.2. It is understood that alternative or more specific scenarios may occur, but the principles remain that a fisheries stakeholder or fishers currently onshore and wishing to communicate with the Applicant should contact the relevant FIR² and/or CFLO; where they are offshore and working in the vicinity of Morven North and Morven South with a more immediate issue or concern, they should contact the CFLO and/or the OFLO.
- 5.3.1.5 Contact details of the CFLO will be included within NtMs that will be issued a minimum of 14 days prior to the commencement of works, where feasible.

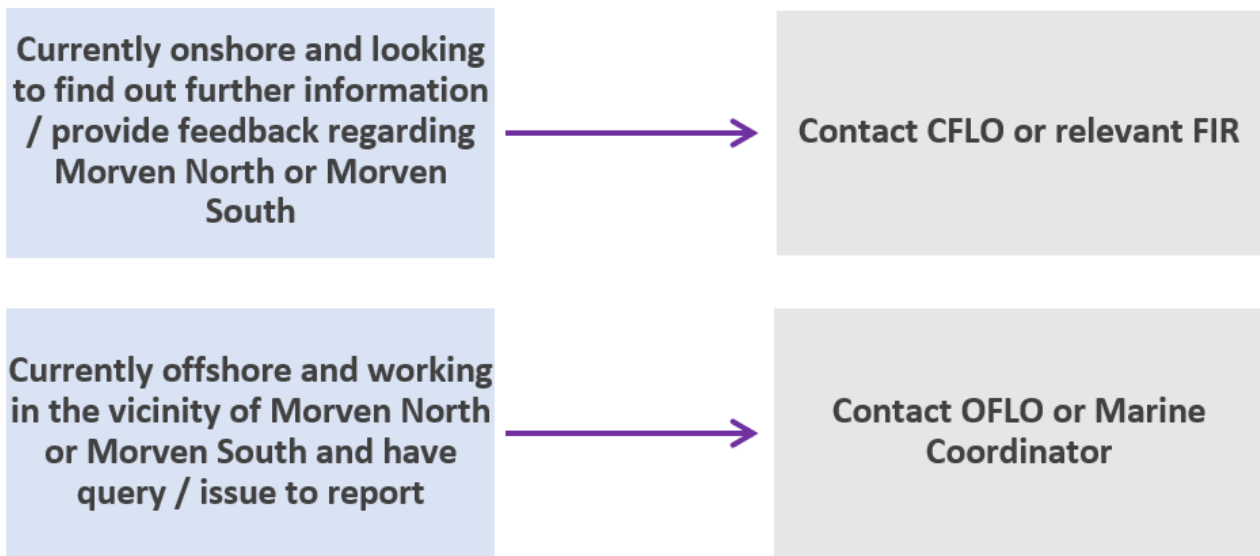


Figure 5.2: Morven North and Morven South fisheries contacts in specific scenarios

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Appendix A Summary of stakeholder engagement carried out in relation to the Fisheries Mitigation, Monitoring and Communication Plan

6.1.1.1 In addition to ongoing stakeholder engagement on Morven North and Morven South, Apx Table 1 provides a summary of the stakeholder engagement carried out specifically in relation to this FMMCP.

ApX Table 1: Summary of key consultation issues raised during consultation activities undertaken for Morven North and Morven South of relevance to the Fisheries Mitigation Monitoring Communication Plan

Date, consultation type and stakeholder	Stakeholder comment	Summary of how stakeholder views informed FMMCP	Applicant response where stakeholder views did not affect a change	Reasons for divergence of views between parties
<p>15 January 2026 Draft FMMCP issued to:</p> <ul style="list-style-type: none"> • N&EC RIFG; • SFF; • SPFA; • SWFPA; <p>30 January 2026 Written feedback on draft FMMCP received from SFF</p>	<ul style="list-style-type: none"> • Concern regarding continued reliance on previously established fisheries liaison guidance (FLOWW) following withdrawal from that process; recommendation that references be removed and future Scottish-specific guidance acknowledged. • Concern that conclusions of 'no significant effects' in EIA terms may not adequately reflect displacement, disruption and cumulative pressures experienced by fishing fleets. • View that representation of fishing activity within baseline tables and narrative underestimates variability and potential future 	<ul style="list-style-type: none"> • The FMMCP has been revised to reduce reliance on cross-reference to previously established fisheries liaison guidance. The document now sets out fisheries liaison, mitigation, monitoring and communication procedures directly within the FMMCP for clarity and transparency. In the absence of replacement Scottish-specific guidance, the Applicant has had regard to established good practice principles consistent with current regulatory guidance. • The FMMCP has been updated to remove wording that characterised Cooperation Agreements as 	<ul style="list-style-type: none"> • The impact assessment conclusions of no likely significant project-level effects remain unchanged, as these reflect the inclusion of designed-in mitigation measures rather than an absence of interaction with fishing activity. • The cumulative effects assessment within the EIA identifies significant cumulative effects for certain fleets arising from the combined influence of multiple offshore wind developments and other spatial pressures. The FMMCP focuses on mitigation, monitoring and communication measures that the Applicant can reasonably implement. As cumulative displacement pressures arise from multiple developments, no further amendment to the FMMCP is proposed at this stage, although continued engagement through regional forums will support 	<ul style="list-style-type: none"> • Differences regarding mobile gear compensation arise from differing interpretations of likely demonstrable loss and established industry practice. • Monitoring detail divergence reflects differing expectations between stakeholders seeking project-specific commitments and the Applicant's preference for proportionate, regionally coordinated monitoring frameworks.

Date, consultation type and stakeholder	Stakeholder comment	Summary of how stakeholder views informed FMMCP	Applicant response where stakeholder views did not affect a change	Reasons for divergence of views between parties
	<p>changes over the project lifetime.</p> <ul style="list-style-type: none"> Concern regarding the framing of Cooperation Agreements as 'unlikely to be required'; recommendation that such mechanisms remain available tools without qualification. Request that compensation mechanisms not be limited to static gear and include provision for mobile gear where demonstrable impacts arise. View that monitoring proposals lack sufficient project-specific detail and clearer commitments independent of regional frameworks would be desirable. Request for stronger treatment of cumulative effects, reflecting anticipated regional 	<p>'unlikely to be required', retaining them as an available mitigation tool where appropriate.</p> <ul style="list-style-type: none"> The FMMCP has been amended to clarify that the target cable burial depth is 1m (with 0.5m as a minimum threshold triggering additional protection). The FMMCP has been amended to clarify that dropped-object notifications address risks to fishing, as well as navigational safety. The organogram and Section 5.2 have been updated to explicitly reference construction vessels and clarify OFLO deployment expectations (i.e. deployment on survey or construction vessels wherever practicable, with guard vessel placement only 	<p>coordinated consideration of cumulative issues.</p> <ul style="list-style-type: none"> The Cooperation Agreement framework remains focused on static gear, on the basis that mobile gear fleets are generally able to adapt to temporary construction activity through advance notification and liaison, and are not anticipated, based on the current assessment, to experience demonstrable loss of access attributable solely to Morven North or Morven South. Monitoring proposals remain framed within a regional and collaborative context, rather than specifying project-level monitoring, reflecting both the cumulative nature of the potential effects and the limited contribution of Morven North and Morven South to those effects. The Applicant considers that a coordinated, strategic approach to commercial fisheries monitoring at a regional scale is the most appropriate and proportionate mechanism 	

Date, consultation type and stakeholder	Stakeholder comment	Summary of how stakeholder views informed FMMCP	Applicant response where stakeholder views did not affect a change	Reasons for divergence of views between parties
	<p>development pressures.</p> <ul style="list-style-type: none"> Request that 1m burial depth be adopted as the preferred baseline target, with justification where not achievable. Request for consistent terminology acknowledging risks to fishing as well as navigation, i.e., request that dropped-object notifications explicitly reference fishing risks as well as navigational hazards. Request that construction vessels be explicitly referenced in governance structures. Request that OFLO deployment be explicitly stated as occurring on survey or construction vessels wherever practicable. 	<p>where genuinely unavoidable).</p> <ul style="list-style-type: none"> Additional narrative has been included within the FMMCP to provide greater contextual explanation of the commercial fisheries baseline (see section 2.1). 	<p>for understanding and managing cumulative interactions, ensuring consistency across developments.</p>	

Date, consultation type and stakeholder	Stakeholder comment	Summary of how stakeholder views informed FMMCP	Applicant response where stakeholder views did not affect a change	Reasons for divergence of views between parties
<p>12 February 2026 In-person and virtual meeting with the following attendees to discuss feedback on the draft FMMCP:</p> <ul style="list-style-type: none"> • SFF; • SPFA; • SWFPA; • The Applicant; • Lead EIA Consultant; • Commercial Fisheries consultant. 	<ul style="list-style-type: none"> • Stakeholders reiterated written feedback previously provided, as summarised above. • In addition, concern was expressed that demersal seine activity is underrepresented within the commercial fisheries baseline and that turbine spacing of approximately 1 km may not be compatible with demersal seine operations. 	<p>In addition to the FMMCP amendments noted in the row above, the Applicant verbally reiterated commitments already reflected in the FMMCP:</p> <ul style="list-style-type: none"> • Continue engagement regarding cumulative effects through regional forums, including the East Region Commercial Fisheries Working Group. • Provide further opportunity for stakeholders to be engaged on turbine layout during formal consultation on the DSLP, which will be subject to consultation with SFF. 	<ul style="list-style-type: none"> • The Applicant's assessment remains evidence-led. Available datasets covering the previous 10 years do not indicate notable or sustained demersal seine activity within the Morven North or Morven South boundaries (with limited fringing activity on the northeastern boundary of Morven North). On this basis, the assessment does not conclude a significant project-alone effect on demersal seine activity. The Applicant remains committed to ongoing engagement during development of the turbine layout and will continue to consider fisheries feedback during the post-consent design process. 	<ul style="list-style-type: none"> • Stakeholders consider that historic and potentially recurring fishing activity (demersal seine activity) warrants precautionary consideration in future turbine layout; the Applicant's assessment relies on available data which indicate limited current activity within Morven North and Morven South boundaries.