Addendum to the Environmental Impact Assessment Report

NISA

North Irish Sea Array

Volume 3 - Offshore Chapters

Chapter 16
Commercial Fisheries

Statkraft

CIP
Copenhagen Infrastructure Partners

GoBe
APEM Group

ARUP

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16. Commercial Fisheries

North Irish Sea Array Windfarm Ltd (NISA, hereafter referred to as 'the Developer') has been considering the Request for Further Information (RFI) issued by An Bord Pleanála as well as the third-party submissions received following public consultation. At An Bord Pleanála's behest, the Developer has also continued to consult with stakeholders in respect of the 2024 planning application throughout 2024-2026. The Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI. Amendments are therefore required to Chapter 16: Commercial Fisheries of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2 Consultation Report.

For the purposes of clarity, this document shall be read in conjunction with the Chapter 16: Commercial Fisheries submitted as part of the 2024 EIAR.

Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR will be clearly labelled as such.

Text in bold is only used throughout this document to indicate where changes are required, and why they are required. Text in italics is text from a section of the 2024 EIAR which is deleted, or quotations from other documents (as explicitly stated). Replacement text is in normal font.

Tables and figures which have been updated from the 2024 EIAR, or entirely new tables and figures, have been included in the Addendum to the EIAR. These can be identified by the "A" prefix in the caption. Any changes within an updated table, in comparison to tables within the 2024 EIAR, are indicated by grey shading in the relevant cell, column or row, as necessary. The exception to this is when a table has changed in its entirety.

The sections relevant to Chapter 16: Commercial Fisheries in the RFI are included below.

RFI Section	RFI	Relevance to Chapter
1 (b)	The scientific information provided as part of the planning application documentation should be based on up-to-date survey reports and data. Accordingly, the applicant is requested to confirm/provide justification/verification that the information submitted in support of the planning application remains relevant and appropriate at the point of submitting further information or to update same as required.	The timeframes associated with the RFI have necessitated a review of the datasets previously used in the 2024 EIAR to ensure any necessary updates to the baseline environment are captured. These are detailed in Section 16.2.4 of this chapter and Appendix A16.1: Commercial Fisheries Technical Report.
4	The documentation submitted does not provide specific detail, assessment, or review of the range of ecosystem functions and services which could be impacted by the proposed development. The National Marine Planning Framework (NMPF) states that proposals to protect, maintain, restore, and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes. Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats.	A synopsis report of ecosystem functions and services has been provided in Appendix A3.3 Ecosystem Functions and Services Assessment, which considers the full range of ecosystem services set out in the report 'Valuing Ireland's Blue Ecosystem Services' (SEMRU of NUI Galway, 2018). The outcome of individual receptor assessments concluded no material impact on ecosystem services, and no impediment to the ability of normal ecosystem functions and services to function, resulting from the proposed development. The Developer has not included a separate assessment in the respective Chapters of the EIAR as the conclusions of the EIAR are already directly linked to the assessment of ecosystem functions and services. This includes assessment of decommissioning impacts, the need for adaptive management, ongoing monitoring and/or other mitigations.

RFI Section	RFI	Relevance to Chapter
	The applicant is requested to update the EIAR to include an assessment of impacts (both positive and negative) on relevant ecosystem functions and services and include mitigation measures, as appropriate. The applicant is also requested to submit a synopsis report of the relevant impacts on ecosystem functions and services. In identifying the relevant ecosystem services for assessment, including those services classified as provisioning, regulation and maintenance, and cultural services, the applicant is advised to consider the full range of ecosystem services set out in the report 'Valuing Ireland's Blue Ecosystem Services' (SEMRU of NUI Galway, 2018), as referenced in the NMPF. The report should also consider the need for an adaptive management framework for ongoing assessment and should include provision for appropriate monitoring of any mitigation measures and operational management strategies, as well as provision for decommissioning.	
5	The Board notes that cumulative assessment was addressed under each topic specific chapter in the EIAR and addressed within Chapter 38 Cumulative and Interrelated Effects Assessment (CEA) (and associated Appendices 38.1 and 38.2). The Marine Institute in their observation raises concerns in relation to the methodology applied in the submitted cumulative effects assessment and the manner in which the information is presented, noting the lack of a standard Irish methodology in relation to CEA. The applicant is advised that guidance exists in the UK, namely Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK, September 2024 (NSIP, 2024). The applicant is requested to revise the submitted cumulative assessment in line with NSIP (2024) and submit a standalone document to clearly demonstrate the CEA conclusions. In the interests of consistency and transparency, the applicant is requested to complete the assessment in accordance with the templates provided in the NSIP (2024), namely "Appendix 1: Matrix 1 – Identification of 'other development' for CEA" and "Appendix 2: Matrix 1 – Assessment matrix" (see attached Appendix B). This assessment should include each of the Irish Sea Phase 1 ORE Projects, namely (Oriel WF (ABP-319799-24), Arklow WF (ABP-319864-24), Codling Wind Park (ABP-320768-24), and Dublin Array WF (ABP-321992-25), and all other relevant projects in the International Council for the Exploration of the Sea (ICES) Celtic Sea and Greater North Sea ecoregions, regardless of project type. It is further requested that the applicant confirm that the now published documentation pertaining to the Irish Sea Phase 1 ORE projects, which have all been submitted to the Board for planning consent since this application was submitted, have been fully incorporated into the cumulative effects assessment. In accordance with NSIP (2024) tiered approach, it is requested that the subject proposal and each of the Irish Sea Phase 1 ORE projects be classified under Tier 1 ("Other existing and, or approved development submitted applications under the Planning Acts or other regimes but not yet determined"). The applicant is requested to update the application documentation, where relevant. In the interests of comprehensiveness and for ease of reference, the applicant is strongly encouraged to liaise with the other Irish Sea Phase 1 ORE Project applicants in the preparation of the above assessment and drafting of the tables attached in Appendix B.	The cumulative effects assessment has been revised in line with NSIP (2024) and relevant sections of this chapter have been updated.

RFI Section	RFI	Relevance to Chapter
12	The NMPF provides that the proposed development should be considered in the context of co-existences with existing marine activities in the area, including fisheries and aquaculture. Having regard to the provisions of the NMPF, the submitted EIAR (including the Fisheries Management and Mitigation Strategy, Appendix 16.2), and all observations made:	The NMPF and co-existence is addressed Chapter 16 Commercial Fisheries and Appendix A16.2 Fisheries Management and Mitigation Strategy (FMMS), which together set out the Developer's approach to fisheries coexistence, mitigation, monitoring and ongoing engagement. In particular, this includes further development of the Sustainable Fisheries Community (SFC) (see Appendix B of Appendix A16.2) and the updated mitigation measures in Table A16.5. The FMMS further sets out the detailed Fisheries Liaison Strategy, Co-existence Strategy, disturbance payment approach and framework arrangements that would support implementation of these measures.
12 (a)	The applicant is requested to address observations by prescribed bodies and observers who raise concerns in relation to the potential impacts on commercial fishing arising from the proposed development within both the array and the cable route corridor areas, specifically relating to the practicality and uncertainties of co-existence with reference to Co-existence Policy 1 in the NMPF.	Addressed through Appendix A16.1: Commercial Fisheries Technical Report, which details co-existence measures and the further development of the SFC (see Appendix B of Appendix A16.1:). This chapter now cross-refers to Appendix A16.2: FMMS for the detailed Co-existence Strategy, Fisheries Liaison Strategy and updated mitigation in Table A16.5, including liaison roles, notice procedures, advisory safety zones, cable burial and protection principles, and code of good practice measures intended to support practical coexistence within the array area and Export Cable Corridor (ECC). Appendix A16.2 FMMS also includes a Technical Co-existence Assessment (Appendix A16.2), which concludes that coexistence is technically achievable subject to defined trawling corridors between WTGs, cable burial standards, fisheries-informed operational protocols and monitoring.
12 (b)	The applicant is requested to address observations by prescribed bodies and observers who raise concerns in relation to the displacement of fishing effort during operational activities. In particular, the Marine Institute submit that the displacement of fishing effort would potentially increase fishing pressure and competition in neighbouring areas and have an impact on smaller vessels which cannot travel beyond their main area of activity. The applicant is requested to consider, in a holistic and integrated manner, cumulative impacts (see also point 5 above) associated with the potential effects of such displacement of fishing effort associated with other Irish Sea Phase 1 ORE projects in this area.	Observations have been addressed through the cumulative effects assessment in this chapter and the FMMS (Appendix A16.2) Cumulative Mitigation Strategy. This chapter assesses cumulative effects in Section 16.9, including reduction in access, displacement and increased fishing pressure in combination with other Irish Sea projects, while Appendix A16.2 sets out the corresponding cumulative mitigation approach. This includes use of the SFC as the primary mechanism for long-term monitoring to improve the evidence base on fishing activity and displacement, continued engagement with fisheries stakeholders, public bodies and other Phase One developers, and an adaptive, evidence-led approach to responding to cumulative displacement should it arise. Further relevant detail is also provided in relation to the SFC framework arrangements, funded initiatives and consultation in Appendices B and C of the FMMS.

16.1 Introduction

The key change to this section is the further development of the Sustainable Fisheries Committee (SFC) as part of the Fisheries Mitigation and Management Strategy (FMMS). Therefore, the following is to be added to Section 16.1 of the 2024 EIAR, specifically under what Chapter 16 should be read in conjunction with:

- Appendix A16.1: Commercial Fisheries Technical Report
- Appendix A16.2: Fisheries Mitigation and Management and Strategy.

There are no further changes to this section. Refer to Section 16.1 of Chapter 16 of the 2024 EIAR.

16.2 Methodology

16.2.1 Introduction

There are no changes to this section. Refer to Section 16.2.1 of Chapter 16 of the 2024 EIAR.

16.2.2 Study Area

Whilst there are refinements to the proposed development design and a reduction in the spatial extent of Project Options 1 and 2 within the array area (see Appendix A5.1: Design Refinements, Chapter 6 Description of the Proposed Development Offshore and Chapter 8 Construction Strategy - Offshore), the defined offshore development area and thus the commercial fisheries study areas, remain unchanged. Therefore, there are no changes to this section. Refer to Section 16.2.2 of Chapter 16 of the 2024 EIAR.

16.2.3 Relevant Guidance and Policy

In response to RFI Section 1 (b), the key change to this section is the availability of further guidance documents of relevance to offshore wind development and commercial fisheries. These additional guidance documents have been considered in the context of offshore wind and fisheries interactions; however, they do not introduce any new requirements or evidence that would materially change the commercial fisheries assessment approach, baseline characterisation, impact assessment, or mitigation measures set out in Chapter 16 of the 2024 EIAR.

Therefore, the following are to be added to Section 16.2.3 of the 2024 EIAR:

- Seafood/ORE Working Group – Dispute Resolution Mechanism (DRM) (DECC / Seafood-ORE Working Group).
- Use of Fishing Vessels for Commercial Work on ORE Projects – A Guide to Registration (DECC / Seafood-ORE Working Group).
- Seafood/ORE Working Group Annual Report 2024 (DECC / Seafood-ORE Working Group).
- Seafood/ORE Working Group Annual Report 2025 (DECC / Seafood-ORE Working Group).
- Guidance Note for Applicants applying for a Maritime Area Consent (MAC) (MARA, latest guidance note and toolkit materials, 2025).
- The Maritime Navigation Safety & Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI) (Department of Transport / Irish Coast Guard; published 4 June 2025 and updated 24 September 2025).
- Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) (2025). Best Practice Guidance for Offshore Renewables Developments.

There are no further changes to this section. Refer to Section 16.2.3 of Chapter 16 of the 2024 EIAR.

16.2.4 Data Collection and Collation

In response to RFI Section 1 (b), the key change to this section is the update to Table 16.2 of the 2024 EIAR, which lists additional and more recent data that have become available since submission of the 2024 EIAR. New and updated information considered in this chapter is indicated by the grey shading in Table A16.1. The new information has been reviewed and included to ensure the impact assessment is informed by the most current and up-to-date data.

There are no other changes required to this section. Refer to Section 16.2.4 of Chapter 16 of the 2024 EIAR.

Table A16.1 Data sources (replaces Table 16.2 of Chapter 16 of the 2024 EIAR)

Country	Data	Time period	Source
Landing statistics			
Ireland	Landing statistics data for Irish-registered vessels, with datasets for: year (2020-2024), weight of landing (tonnes) and first sales value (€) and either: • Port of landing; or • Species	2020 to 2024	Sea Fisheries Protection Agency (SFPA)
Ireland	Landings statistics data for Irish-registered vessels, with data query attributes for: species, weight of landing (kg) and first sales value (€) at the following geographic scales: • All ICES divisions • Irish Sea (7a) indicating port of landing • Irish Sea (7a) indicating ICES rectangle of catches.	2015 to 2022	Sea Fisheries Protection Agency (SFPA)
All Europe	Landings statistics for EU registered vessels with data query attributes for: landing year; landing quarter; ICES rectangle; vessel length; gear type; species; and landed weight (tonnes).	2012 to 2016	EU Data Collection Framework (DCF) database
Ireland	Estimates of annual landings (tonnes) and value (€) of crustacean and bivalve shellfish (excl. prawns and mussels) into Ireland 2004-2019 (source: Logbook declarations and sales notes for vessels under 10 m, gatherer dockets, co-op data).	2004 to 2019	Marine Institute and BIM
UK	Landings statistics data for UK-registered vessels, with data query attributes for: landing year; landing month; vessel length category; ICES rectangle; vessel/gear type; port of landing; species; live weight (tonnes); and value. These landings statistics are published annually by the MMO and include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man (IOM), Guernsey and Jersey. Commercial fishing vessels that are registered to the IOM are required to hold both IOM and UK fishing licences.	2016 to 2021	Marine Management Organisation (MMO)
Spatial data and Vessel Monitoring System (VMS) data			
All Europe	VMS data for EU registered vessels ≥12m length. VMS data sourced from ICES displays the surface Swept Area Ratio (SAR) of catches by different gear types and covers EU (including UK) registered vessels 12m and over in length. Surface SAR indicates the number of times in an annual period that a demersal fishing gear makes contact with (or sweeps) the seabed surface. Surface SAR provides a proxy for fishing intensity.	2017 to 2020	ICES
All Europe	Fishing vessel route density, based on vessel Automatic Information System (AIS) positional data. AIS is required to be fitted on fishing vessels ≥15m length.	2019 to 2022	European Maritime Safety Agency (EMSA)
Ireland	Fishing vessel effort data indicating high and low fishing effort. The data are available for all EU vessels of 12m and larger, operating inside the Irish EEZ; outside this zone only Irish VMS data are routinely available within the data sets.	2014 to 2018	Marine Institute
Ireland	Polygon data indicating fishing grounds for Irish vessels operating inshore.	Undefined	Marine Institute
UK	VMS data for UK registered vessels ⩾15m length. Note that UK vessels ≥12m in length have VMS on board, however, to date, the MMO provide amalgamated VMS datasets for ≥15m vessels only. VMS data sourced from MMO displays the first sales value (£) of catches.	2016 to 2020	MMO

16.2.5 Consultation

In response to RFI Section 1 (b), the key change to this section is the additional consultation that has been undertaken with commercial fisheries stakeholders. Therefore, the following is to be added to Section 16.2.5 of the 2024 EIAR:

Consultation to inform the FMMS has been extensive and ongoing, with engagement significantly expanded through the development of the SFC. This has included regular pier visits, engagement with fisheries organisations, seafood producers, government departments, prescribed bodies and wider offshore renewable and fisheries stakeholders, together with targeted discussions on FMMS development, coexistence, cumulative effects and related initiatives such as the Digital Effort Traceability Project (DETP) and Low Impact Fishery Pilot.

For further details, refer to Appendix A16.2: Fisheries Mitigation and Management Strategy and Appendix C of Appendix A16.2.

There are no further changes to this section. Refer to Section 16.2.5 of Chapter 16 of the 2024 EIAR.

16.2.6 Methodology for Assessment of Effects

There are no changes to this section. Refer to Section 16.2.6 of Chapter 16 of the 2024 EIAR.

16.2.6.1 Sensitivity criteria

There are no changes to this section. Refer to Section 16.2.6.1 of Chapter 16 of the 2024 EIAR.

16.2.6.2 Magnitude of impact criteria

There are no changes to this section. Refer to Section 16.2.6.2 of Chapter 16 of the 2024 EIAR.

16.2.6.3 Defining the significance of effect

There are no changes to this section. Refer to Section 16.2.6.3 of Chapter 16 of the 2024 EIAR.

16.3 Baseline Environment

16.3.1 Introduction

There are no changes to this section. Refer to Section 16.3.1 of Chapter 16 of the 2024 EIAR.

16.3.2 Receiving Environment

In response to RFI Section 1 (b), additional baseline data have been reviewed and documented in Appendix A16.1. The additional data does not change the description of the receiving environment. Therefore, there are no changes to this section. Refer to Section 16.3.2 of Chapter 16 of the 2024 EIAR.

16.3.2.1 Commercial fisheries local study area

There are no changes to this section. Refer to Section 16.3.2.1 of Chapter 16 of the 2024 EIAR.

16.4 Characteristics of the Proposed Development

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2. In the 2024 EIAR, WTG monopile and jacket foundations with pin piles and OSP monopile and jacket foundations with pin piles were considered. Following design refinement in response to the RFI, monopiles have been removed and WTGs are now proposed with SBJ foundations, and OSPs with jacket foundations installed with either drilled pin piles or suction buckets, as indicated by the grey shading in Table A16.2 below. Therefore, Table 16.6 of Chapter 16 of the 2024 EIAR shall be deleted and replaced with Table A16.2.

Table A16.2 Key characteristics of Project Option 1 and Project Option 2 (replaces Table 16.6 of Chapter 16 of the 2024 EIAR)

Key Offshore Characteristics	Project Option 1	Project Option 2
Array area	88.5km2	88.5km2
ECC	36.45km2	36.45km2
Landfall	One landfall site, immediately south of Bremore Point, which includes two subtidal exit pits within the ECC	One landfall site, immediately south of Bremore Point, which includes two subtidal exit pits within the ECC
Wind Turbine Generator (WTG)	49 WTGs with 250m rotor diameter	35 WTGs with 276m rotor diameter
WTG Foundations	49 SBJs (three or four leg configuration) requiring seabed preparation	35 SBJs (three or four leg configuration) requiring seabed preparation
Offshore Substation Platform (OSP) Foundations (array area)	One OSP, installed on a multi-leg jacket foundation (four leg configuration) with either suction buckets or drilled pin piles	One OSP, installed on a multi-leg jacket foundation (four leg configuration) with either suction buckets or drilled pin piles
Cables	Installation of 111km of array cables within the array area and installation of two 18km export cables within the ECC	Installation of 91km of array cables within the array area and installation of two 18km export cables within the ECC

There are no further changes to this section. Refer to Section 16.4 of Chapter 16 of the 2024 EIAR.

16.4.1 Parameters for assessment

There are no changes to this section. Refer to Section 16.4.1 of Chapter 16 of the 2024 EIAR.

16.4.2 Construction

There are no changes to this section. Refer to Section 16.4.2 of Chapter 16 of the 2024 EIAR.

16.4.3 Operational Phase

There are no changes to this section. Refer to Section 16.4.3 of Chapter 16 of the 2024 EIAR.

16.4.4 Decommissioning

There are no changes to this section. Refer to Section 16.4.4 of Chapter 16 of the 2024 EIAR.

16.4.5 Embedded Mitigation Measures

The change required in this section is in response to the refinement of the foundation types for Project Option 1 and Project Option 2. Therefore, Table 16.7 of Chapter 16 of the 2024 EIAR shall be deleted and replaced with Table A16.3.

Table A16.3 Embedded mitigation relevant to commercial fisheries (replaces Table 16.7 in Chapter 16 of the 2024 EIAR)

Embedded mitigation	Justification
Construction	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the proposed development including: • Continuation of the appointment of a company FLO to continue to maintain effective communications between the Developer and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023); • Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works; • Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of proposed development activities and associated advisory safe passing distances; and

Embedded mitigation	Justification
	• Development of an FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Agreement of lighting and marking with Commissioners of Irish Lights during construction.	Implementation of a buoyed construction area around the site (assumed to be 12 construction buoys) during the appropriate phases, in consultation with Commissioners of Irish Lights.
Dropped objects	The approach for dealing with dropped objects, including reporting and recovery of dropped objects where they pose a potential hazard to other marine users, is included in the offshore environmental management plan (EMP). Measures to prevent dropped objects include: • Good housekeeping practices, with all wastes correctly stored. • Storage of hazardous chemicals as per material safety data sheet (MSDS); • Lift planning for over-the-side lifting (including appropriate crane rigging and load ratings, crane operator and rigger training and competency requirements) all lifting equipment will be tested and certified. • A ship-to-ship transfer permit will be in place • All deck items will be securely stowed • Transfers of objects will use specialist equipment and consider environmental conditions • Ongoing personnel awareness and training, and dropped object prevention programs (e.g., lanyards on hardhats, hand tools) • Safe working procedures to prevent dropped objects • Procedures will be put in place to ensure that the location of any lost material is recorded and that significant objects are recovered – including ROV and boat recovery where practicable • Ongoing personnel awareness and training, and dropped object prevention programs; and • Waste Management Plan.
Cable burial	Preferred means of cable protection is cable burial with typical trench depth of between 1-3 m and typical trench width of 1 m,
Cable Burial Risk Assessment (CBRA)	CBRA undertaken pre-construction following detailed site investigation surveys including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes. To include consideration of requirements for monitoring of the protection.
Guard vessels	Use of temporary guard vessel during construction phase will be employed if deemed necessary during detailed design stage and following consultation with the relevant statutory authorities, e.g. to protect unlit structures and/or unprotected cable prior to burial.
Advisory safety zones	During construction, the proposed development will deploy advisory safety zones around individual structures undergoing installation. Irish navigational guidance is available through the Department of Transport's Maritime Navigation Safety Guidance and Emergency Response document for Offshore Renewable Energy Installations (2025), which has taken account of relevant UK guidance, in particular Maritime and Coastguard Agency MGN 654 (Maritime and Coastguard Agency, 2021) in the establishment of advisory safety zones. Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established. Advisory safety zones of 50m will be sought for incomplete structures where construction activity may be temporarily paused (and therefore the 500m safety zone has lapsed) such as installed foundations or where construction works are completed but the WTGs have not yet been commissioned.
Advisory safe passing distances	Use of advisory safe passing distances including surrounding vessels that are undertaking sensitive construction, installation, or maintenance works. These vessels are likely to display Restricted in Ability to Manoeuvre (RAM) status.
Operation	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the proposed development, including: • Continuation of the appointment of a company FLO to continue to maintain effective communications between the Developer and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023); • Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works;

Embedded mitigation	Justification
	• Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of proposed development activities and associated advisory safe passing distances; and Development of a FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Snagging	In the instance that snagging does occur, the Developer will work to the protocols laid out within the guidance produced by the UK FLOWW group and 'Recommendations for Fisheries Liaison: Best Practice' guidance for offshore renewable developers, in particular Section 11: Dealing with claims for loss or damage of gear as confirmed in the FMMS (Appendix A16.2).
Agreement of lighting and marking with Commissioners of Irish Lights during the operational phase.	The Developer is committed to marking and lighting the proposed development in accordance with relevant industry guidance and as advised by relevant stakeholders including in accordance with IALA Recommendation O-139 (IALA, 2013) and Irish Lights requirements. In particular, the use of marine lighting to mark selected peripheral structures. The Developer will also ensure all structures associated with the proposed development are adequately marked on nautical and electronic charts.
Advisory safety zones	During the operational phase, the proposed development will deploy advisory safety zones around any WTG or OSP to protect technicians, crew and vessels on-site during any maintenance works. Safety zones are not a statutory requirement in Ireland meaning they are advisory only, however following UK guidance MGN 654 (Maritime and Coastguard Agency, 2021) the safety zones will be 50m during the operational phase.
Advisory safe passing distances	The proposed development will recommend that advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels during the operational phase.
Decommissioning	
Fisheries liaison	The Developer is committed to ongoing liaison with fishers throughout all stages of the proposed development, including: • Continuation of the appointment of a company FLO to continue to maintain effective communications between the Developer and fishers, in compliance with the Seafood/ORE Engagement in Ireland guidance (Seafood/ORE Working Group, 2023); • Appropriate liaison with relevant fishing interests to ensure that they are fully informed of development planning and any offshore activities and works; • Timely issue of notifications including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings to the fishing community to provide advance warning of proposed development activities and associated advisory safe passing distances; and Development of a FMMS (Appendix A16.2) setting out in detail the approach to fisheries liaison and means of delivering co-existence and disruption payments.
Agreement of lighting and marking with Commissioners of Irish Lights during decommissioning.	Implementation of a buoyed decommissioning area around the site (assumed to be 12 decommissioning buoys during the appropriate phases, in consultation with Commissioners of Irish Lights.
Advisory safety zones	During decommissioning the proposed development will deploy advisory safety zones around individual structures undergoing installation. Due to a lack of Irish guidance, it is proposed to establish zones based on the relevant UK guidance, UK guidance MGN 654 (Maritime and Coastguard Agency, 2021). Advisory safety zones of up to 500m in radius around individual structures undergoing installation will be established.
Advisory safe passing distances	Use of advisory safe passing distances including surrounding vessels that are undertaking sensitive decommissioning works. These vessels are likely to display Restricted in Ability to Manoeuvre (RAM) status.
Decommissioning strategy	A decommissioning strategy will be developed to cover the decommissioning phase and included as part of the Offshore EMP. The decommissioning strategy is anticipated to cover the removal of all structures above the seabed; decision to leave or remove scour protection and buried assets; and secure burial of export cables in the intertidal area. As the decommissioning phase will be a similar process to the construction phase but in reverse (i.e., increased proposed development vessels on-site, partially deconstructed structures) the embedded mitigation measure and post-effect mitigation measures will be similar to those for the construction phase.

There are no further changes to this section. Refer to Section 16.4.5 of Chapter 16 of the 2024 EIAR.

16.4.6 Potential Impacts

As a result of design refinements, WTGs are now proposed to be installed on SBJ foundations, while the OSP will be mounted on jacket foundations with either drilled pin piles or suction bucket foundations. These changes have also affected other design parameters, leading to a change in the relevant characteristics of Project Option 1 and Project Option 2. Therefore, Table 16.8 of Chapter 16 of the 2024 EIAR shall be updated and replaced with Table A16.4 below. New and updated information considered in this chapter is indicated by the grey shading in Table A16.4.

Table A16.4 Potential impacts and magnitude of impact per project option. The project option that has the greatest magnitude of impact is identified in blue (replaces Table 16.8 of Chapter 16 of the 2024 EIAR)

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
Construction phase			
1. Array area construction activities and physical presence of offshore infrastructure during the construction period leading to reduction in access to, or exclusion from established fishing grounds	**Construction period:** • Up to 2 years (array area only) plus 12 months pre-construction preparation. **Advisory Safety Zones** • 500m advisory safety zones around construction activities • 50m advisory safety zones around partially complete infrastructure or complete project structures • 500m advisory clearance distances around installation vessels **Seabed disturbance array area:** • Jack-up footprint = 226,195m² • Array cable corridor area = 4,440,000m² • Array boulder clearance area = 9,621m² • Array anchors/buoys disturbance = 75,960m² • **Total array-area temporary disturbance = 4,765,913m²** **Presence of infrastructure array area:** WTG + Offshore Substation Platform (OSP) with scour = 377,148m² Rock berm area = 2,750m² Inter-array cable protection (assuming 20% cable will require additional cable protection) = 111,000m² **Total area of infrastructure (foundations, scour, cable protection) = 490,898m² .**	**Construction period:** • Up to 2 years (array area only) plus 12 months pre-construction preparation. **Advisory Safety Zones** • 500m advisory safety zones around construction activities • 50m advisory safety zones around partially complete infrastructure or complete project structures • 500m advisory clearance distances around installation vessels Seabed disturbance array area: **Seabed disturbance array area:** • Jack-up footprint = 165,876m² • Array cable corridor area = 3,640,000m² • Array boulder clearance area = 6,872m² • Array anchors/buoys disturbance = 59,160m² • **Total array-area temporary disturbance = 3,871,908m²** **Presence of infrastructure array area:** WTG + OSP with scour = 271,547m² Rock berm area = 2,750m² Inter-array cable protection (assuming 20% cable will require additional cable protection) = 91,000m² **Total area of infrastructure (foundations, scour, cable protection) = 365,297m² .**	Both Project options have the same overall construction programme, although elements of the construction phase for Project Option 2 will be reduced due to a smaller number of WTGs the overall durations are the same due to the same suite of construction activities required for both. The construction footprint comprises the seabed area undergoing seabed preparation and exclusion zones around major activities. This includes the establishment of advisory safety zones of up to 500m in radius around individual structures. This may be bigger, depending on the nature of the works. It is important to note that the temporal aspect of temporary works will not apply in full throughout the 3 year construction phase. Project Option 1 is the project option with the greatest magnitude of impact for seabed preparation for WTGs/OSP and is based on 49 WTGs and one OSP. It should be noted that, incrementally, there will be a reduction in access due to the presence of WTGs/OSP and scour protection, cable crossings and cable protection, plus the temporary footprint of preparatory works. The permanent footprints are presented in the operational impact and are not repeated here. Project Option 1 is the project option with the greatest magnitude of impact for seabed preparation for cables and is based on a length of 111km of inter-array cables with a 40m wide installation corridor in which cable preparation activities may take place

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
			(this encompasses pre-lay activities (e.g. boulder removal), trenching and spoil width). The OSP footprint is considered with scour protection encompassing the entire footprint of the jacket foundation in-between the jacket legs.
2. ECC construction activities and physical presence of constructed infrastructure leading to reduction in access to, or exclusion from established fishing grounds.	**Construction period:** • Up to 18 months (ECC only) including 12 months pre-construction preparation. **Advisory Safety Zones** 500m advisory safety zones around construction activities 50m advisory safety zones around partially complete infrastructure or complete proposed development structures 500m advisory clearance distances around installation vessels **Seabed disturbance ECC:** Cable seabed preparation and installation in the ECC trench area affected: 18km length, 40m width (including preparatory seabed measures) = 1,440,000m^2. ECC/export-corridor boulder clearance = 196m^2 ECC anchors/buoys disturbance = 6,480m^2 **Subtidal HDD:** Total footprint of disturbance (exit pits, transition zone, temporary sidecast/ deposited material & JUV footprint) = 4,156m^2. **Total area of seabed affected (ECC and HDD) = 1,450,832m^2** **Presence of infrastructure ECC:** Cable protection assuming (20% cable will require additional cable protection) = 36,000m^2. **Total area of infrastructure (foundations, scour, cable protection) = 36,000m^2.**	**Construction period:** • Up to 18 months (ECC only) including 12 months pre-construction preparation. **Advisory Safety Zones** 500m advisory safety zones around construction activities 50m advisory safety zones around partially complete infrastructure or complete proposed development structures 500m advisory clearance distances around installation vessels **Seabed disturbance ECC:** Cable seabed preparation and installation in the ECC trench area affected: 18km length, 40m width (including preparatory seabed measures) = 1,440,000m2. ECC/export-corridor boulder clearance = 196m^2 ECC anchors/buoys disturbance = 6,480m^2 **Subtidal HDD:** Total footprint of disturbance (exit pits, transition zone, temporary sidecast/ deposited material & JUV footprint) = 4,156m^2. **Total area of seabed affected (ECC and HDD) = 1,450,832m^2** **Presence of infrastructure ECC:** Cable protection assuming (20% cable will require additional cable protection) = 36,000m^2. **Total area of infrastructure (foundations, scour, cable protection) = 36,000m^2.**	The ECC and export cable is the same for both project options therefore they have the same magnitude of impact.

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
3. Displacement from within the offshore development area leading to gear conflict and increased fishing pressure on adjacent grounds.	**Construction period:** • Up to 3 years (for the entire offshore development area) including 12 months pre-construction preparation. Characteristics of the offshore development area are as considered in Impact 1 and Impact 2.	**Construction period:** • Up to 3 years (for the entire offshore development area) including 12 months pre-construction preparation. Characteristics of the offshore development area are as considered in Impact 1 and Impact 2.	Project option 1 represents the greatest duration and extent of fishing exclusion throughout the construction phase and hence the greatest potential for displacement.
4. Construction activities leading to disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity.	The project option with the greatest magnitude of impact is presented in the Fish and Shellfish Ecology Chapter.	The project option with the greatest magnitude of impact is presented in the Fish and Shellfish Ecology Chapter.	Project Option 1 represents the greatest magnitude of impact in relation to this impact. The magnitude of the impact is defined by the area of seabed temporarily disturbed or damaged during construction activities. The scenarios presented in the Fish and Shellfish Ecology chapter provide for the greatest disturbance to fish and shellfish species and therefore, the greatest knock-on effect to commercial fisheries. Importantly, this considers the impacts as a whole on commercially important species, rather than any one impact in particular.
Increased vessel traffic associated with the construction of the proposed development within fishing grounds leading to interference with fishing activity.	Maximum number of return trips for the delivery of main components and installation over the construction period: 3,032 Peak number of vessels on site at any time: 50	Maximum number of return trips for the delivery of main components and installation over the construction period: 2,504 Peak number of vessels on site at any time: 47	Project Option 1 is the project option with the greatest magnitude of impact and will lead to the highest level of construction activities and therefore highest level of construction vessel round trips. Project Option 1 is the project option with the greatest magnitude of impact and would result in the greatest potential for interference.
Operation			
5. Physical presence of array area infrastructure leading to reduction in access to, or exclusion from established fishing grounds.	Operational design life of 35 years. **Presence of infrastructure** • WTG + OSP with scour 377,148m² • Rock berm 2,750m² • Inter-array cable protection 111,000m² **Total area of infrastructure (foundations, scour, cable protection) = 490,898m² .**	Operational design life of 35 years. **Presence of infrastructure** • WTG + OSP with scour 271,547m ² • Rock berm 2,750m² • Inter-array cable protection 91,000m² **Total area of infrastructure (foundations, scour, cable protection) = 365,297m² .**	Project Option 1 comprises the greatest footprint of infrastructure (WTGs/OSPs, scour protection, cable crossings and cable protection for cables and entry to WTGs/OSPs) on the seabed, plus maintenance activities throughout the operational phase and associated temporary advisory safety zones.

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
	Advisory Safety Zones: • Temporary 500m advisory safety zones around WTGs and OSP undergoing major maintenance. • Advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels.	**Advisory Safety Zones:** • Temporary 500m advisory safety zones around WTGs and OSP undergoing major maintenance. • Advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels.	Project option 1 is the project option with the greatest magnitude of impact and is based on 49 x WTGs plus one OSP. The smaller the spacing between WTGs the greater the potential for vessels to have restricted access to the site. Project option 1 is the project option with the greatest magnitude of impact and is based on 111km of inter-array cables. Assumes 20% of cable length is unburied due to ground conditions with 5m cable protection width. The assessment assumes that fishing will resume around and between infrastructure within the windfarm where possible, with the exception of an assumed 50m operating distance from infrastructure, areas of cable protection that cannot be fished, and advisory safety zones around infrastructure undergoing major maintenance or replacement. Furthermore, the individual decisions made by skippers with their own perception of risk will determine the likelihood of whether their fishing will resume within the proposed development. Inclement weather will be a significant contributor to this risk perception.
6. Physical presence of the export cable leading to reduction in access to, or exclusion from established fishing grounds.	Operational design life of 35 years. **Export cable:** • Two offshore export cable circuits; • 18km length of offshore export cable; • 20% of offshore export cable requiring remedial protection of height 2m and width 5m; • Total footprint of cable protection = 36,000m² • Zero cable crossings. **Total footprint of cable protection = 36,000m²**	Operational design life of 35 years. **Export cable:** • Two offshore export cable circuits; • 18km length of offshore export cable; • 20% of offshore export cable requiring remedial protection of height 2m and width 5m; • Total footprint of cable protection = 36,000m² • Zero cable crossings. **Total footprint of cable protection = 36,000m²**	The ECC and export cable is the same for both project options therefore they have the same magnitude of impact.

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
	Advisory safe passing distances: • Advisory safe passing distances of 500m around all active maintenance works • Advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels	**Advisory safe passing distances:** • Advisory safe passing distances of 500m around all active maintenance works • Advisory clearance distances of up to 500m in radius are observed around cable installation vessels and cable repair vessels	
7. Displacement from the offshore development area leading to gear conflict and increased fishing pressure on adjacent grounds.	Operational design life of 35 years. Characteristics of the offshore development area are as considered in Impact 6 and Impact 7.	Operational design life of 35 years. Characteristics of the offshore development area are as considered in Impact 6 and Impact 7.	Project Option 1 represents the greatest magnitude of impact in relation to this impact. Project option 1 represents the greatest duration and extent of fishing exclusion throughout the operational phase and hence the greatest potential to cause displacement. It comprises the surface piercing infrastructure and the greatest footprint of infrastructure (WTGs/OSPs, scour protection, cable crossings and cable protection for cables and entry to WTGs/OSPs) on the seabed, plus maintenance activities throughout the operational phase and associated temporary advisory safety zones.
8. Operational activities leading to displacement or disruption of commercially important fish and shellfish resources.	The project option with the greatest magnitude of impact is presented in the Fish and Shellfish Ecology Chapter.	The project option with the greatest magnitude of impact is presented in the Fish and Shellfish Ecology Chapter.	Project Option 1 represents the greatest magnitude of impact in relation to this impact. The magnitude of the impact is defined by the area of seabed temporarily disturbed or damaged during maintenance activities. It includes areas affected by cable maintenance activities and jack-up vessel operations during the maintenance of WTG and OSP foundations. The scenarios presented in the Fish and Shellfish Ecology chapter provide for the greatest disturbance to fish and shellfish species and therefore, the greatest knock-on effect to commercial fisheries. Importantly, this considers the impacts as a whole on commercially important species, rather than any one impact in particular.

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
9. Increased vessel traffic within fishing grounds as a result of changes to shipping routes and maintenance vessel traffic from the proposed development leading to interference with fishing activity.	• Maximum number of vessel return trips per year: 1,261 • Maximum number of vessels on site at any time: 12	• Maximum number of vessel return trips per year: 1,055 • Maximum number of vessels on site at any time: 12	Project Option 1 is the project option with the greatest magnitude of impact and will lead to the highest level of operational activities and therefore highest level of operational vessel round trips.
10. Physical presence of infrastructure leading to gear snagging	Characteristics of the offshore development area are as considered in Impact 6 and Impact 7.	Characteristics of the offshore development area are as considered in Impact 6 and Impact 7	Project Option 1 is the project option with the greatest magnitude of impact and represents the greatest potential for interactions between infrastructure and fishing gear.
Decommissioning phase			
11. Array area decommissioning activities leading to reduction in access to, or exclusion from, potential and/or established fishing grounds.	The decommissioning policy for the proposed development infrastructure is not yet defined however it is anticipated that structures above the seabed would be removed. The following infrastructure is likely be removed reused, or recycled where practicable: • WTGs and foundations (cut at 1m to 2m below the seabed); and • OSP including topsides and foundations (above or up to just under the seabed). The following infrastructure is likely to be decommissioned and could be left in situ depending on available information at the time of decommissioning: • Inter-array cables • Scour protection • Cable protection; and • Part of the foundations (e.g. some foundation material below the seabed may be left in situ). In the absence of detailed methodologies and schedules, decommissioning works and associated implications for commercial fisheries are considered	The decommissioning policy for the proposed development infrastructure is not yet defined however it is anticipated that structures above the seabed would be removed. The following infrastructure is likely be removed reused, or recycled where practicable: • WTGs and foundations (above or up to just under the seabed); and • OSP including topsides and foundations (above or up to just under the seabed). The following infrastructure is likely to be decommissioned and could be left in situ depending on available information at the time of decommissioning: • Inter-array cables • Scour protection • Cable protection; and • Part of the foundations (e.g. some foundation material below the seabed may be left in situ). In the absence of detailed methodologies and schedules, decommissioning works and associated implications for commercial fisheries are considered	The detail and scope of the decommissioning works will be determined by the relevant legislation and guidance at the time. Decommissioning arrangements will be detailed in a Decommissioning Plan, which will be subject to consultation with the Maritime Area Regulatory Authority (MARA) prior to decommissioning. Project Option 1 is the project option with the greatest magnitude of impact and it is anticipated that the impacts will be comparable to those identified for the construction phase.
12. ECC decommissioning activities leading to reduction in access to, or exclusion from established fishing grounds.			
13. Displacement from the offshore development area due to decommissioning activities leading to gear conflict and increased fishing pressure on adjacent grounds.			
14. Decommissioning activities leading to displacement or disruption of commercially important fish and shellfish resources.			
15. Increased vessel traffic within fishing grounds as a result of changes to shipping routes and transiting decommissioning vessel traffic from the proposed			

Potential impact	Project Option 1	Project Option 2	Rationale for the project option with the greatest magnitude of impact
development leading to interference with fishing activity.	analogous with those assessed for the construction phase.	analogous with those assessed for the construction phase.	
16. Physical presence of any infrastructure left in situ leading to gear snagging			

There are no further changes to this section. Refer to Section 16.4.6 of Chapter 16 of the 2024 EIAR.

16.5 Potential Effects

The likely significant effects on commercial fisheries for each stage of the proposed development are considered in Section 16.5 of Chapter 16 of the 2024 EIAR. With the exception of Impact 4 during construction, which is replaced in full below, there are no changes to the assessment of potential effects, the do-nothing scenario, or to the assessments of construction, operation and decommissioning effects.

16.5.1 Do-Nothing Scenario

There are no changes to this section. Refer to Section 16.5.1 of Chapter 16 of the 2024 EIAR.

16.5.2 Construction Phase

With the exception of Impact 4 – Construction activities leading to disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity, there are no changes to the construction phase assessment. Refer to Section 16.5.2 of Chapter 16 of the 2024 EIAR.

In summary, the significance of effect for the construction phase remains as follows:

- Impact 1: very significant for Irish demersal otter trawlers; moderate for UK demersal otter trawlers; and slight for all other fleets.
- Impact 2: significant for Irish demersal otter trawlers, Irish potting vessels and Irish razor dredgers; moderate for UK demersal otter trawlers; and slight for all other fleets.
- Impact 3: significant for Irish and UK demersal otter trawlers; moderate for Irish potting vessels and Irish razor dredgers; and slight for all other fleets.
- Impact 5: moderate for Irish potting vessels; and slight for all other fleets.

16.5.2.1 Impact 4- Construction activities leading to displacement or disruption of commercially important fish and shellfish resources

The change required in this section reflects both the updated Chapter 13 Fish and Shellfish Ecology assessment, informed by the sediment plume modelling undertaken in response to the RFI, and the design refinement for Project Option 1 and Project Option 2. In the 2024 EIAR, WTG monopile foundations and OSP monopile and jacket foundations with pin piles were assessed. Following design refinements , monopiles have been removed. WTGs are now proposed with SBJ foundations, and OSPs with jacket foundations installed with either drilled pin piles or suction buckets. As a result, the predicted effect on the fish and shellfish resource is reduced. Impact 4 in Chapter 16 of the 2024 EIAR is therefore deleted and replaced with the text below.

The installation of the suction buckets will involve lowering the foundation through the water column until touch down onto the seabed, where self-weight penetration will allow embedment of the buckets into the soil. The lowering of the SBJ is a carefully controlled process, whereby the buckets are vented on the top to allow escape of water, both in the lowering through the water column and the self-penetration phase. The suction installation will involve pumping out water during the installation of the suction buckets (for the WTG foundations). This has the potential to draw out fine sediments from the seabed, although this effect is generally most pronounced in highly permeable coarser-grained deposits. In the case of low permeability finer-grained sediments, (which are evident in the shallow soil layers that underlie the proposed development site), the consequence of seepage flow is anticipated to be minimal. Accordingly, the installation of SBJ across the offshore array area is not expected to lead to any locally elevated levels of turbidity. Therefore, this pathway has not been considered further in the assessment.

Sensitivity of the receptor

Exposure to the impact is likely and commercial fleets targeting key species may be affected, including nephrops, brown crab, lobster, whelk and razor shell.

Due to the importance of the nephrops grounds located within the array area and ECC, the sensitivity of Irish demersal otter trawlers targeting nephrops is considered to be medium.

Due to the locality of the impact on razor shell, brown crab and lobster, the sensitivity of the Irish potting fleet and Irish razor dredge fleet is considered to be medium. This is based on the potential for grounds beyond the immediate construction activities to be affected by increased suspended sediment and sediment deposition, and by temporary seabed disturbance, affecting the wider fished areas.

Due to the range of alternative areas targeted and the distribution of key commercial species throughout the Irish Sea, the sensitivity of all other fleets is considered to be low.

Magnitude of impact

Detailed assessments of the following potential construction impacts have been undertaken in the Fish and Shellfish Ecology Chapter for key commercial shellfish species, including nephrops, brown crab, lobster, razor clam and whelk, together with relevant finfish species:

- temporary habitat loss/disturbance from construction operations including foundation installation and cable laying operations;
- increased suspended sediment concentrations as a result of foundation installation, cable installation and seabed preparation;
- sediment deposition as a result of foundation installation, cable installation and seabed preparation; and
- underwater noise as a result of construction activities, including UXO clearance and other construction noise sources.

The assessment in Chapter 13 demonstrates that the predicted effects on fish and shellfish receptors remain localised, temporary or short-term, and are at most slight (adverse), which is not significant in EIA terms. In particular, the revised sediment plume modelling indicates that increases in suspended sediment concentrations and sediment deposition are largely confined to the near-field and adjacent far-field, with effects on nephrops assessed as barely discernible from baseline conditions in the context of the distribution of the western Irish Sea population. The updated habitat disturbance assessment similarly concludes that physical disturbance to the seabed during construction would affect a small area in the context of the wider western Irish Sea Mud Belt and the known extent of nephrops grounds.

With respect to the magnitude of this impact on commercial fisheries, the overall significance of the effect on fish and shellfish species is considered in determining the magnitude for commercial fishing fleets. The updated fish and shellfish ecology assessment concludes that the magnitude of impact on Nephrops is low (adverse), including for temporary increases in SSC and sediment deposition and for temporary habitat damage and disturbance of the seabed. It also concludes that effects on other shellfish receptors of relevance to commercial fisheries, including brown crab, European lobster, common whelk, king scallop and razor clams, are also low (adverse) or lower. Underwater noise effects on fish and shellfish receptors during construction are likewise assessed as at most slight (adverse) and not significant in EIA terms.

The magnitude of impact is therefore considered to be low for Irish demersal otter trawlers, Irish potting vessels and Irish razor dredgers for both Project Option 1 and Project Option 2, and low for all other fleets.

Significance of the effect

Irish demersal otter trawlers: overall, the sensitivity of the receptor is considered to be medium and the magnitude is deemed to be low for both Project Option 1 and Project Option 2. The significance of effect will, therefore, be moderate for both Project Option 1 and Project Option 2, which is not significant in EIA terms.

Irish potting vessels: overall, the sensitivity of the receptor is considered to be medium and the magnitude is deemed to be low for both Project Option 1 and Project Option 2. The significance of effect will, therefore, be moderate for both Project Option 1 and Project Option 2, which is not significant in EIA terms.

Irish razor dredgers: overall, the sensitivity of the receptor is considered to be medium and the magnitude is deemed to be low for both Project Option 1 and Project Option 2. The significance of effect will, therefore, be moderate for both Project Option 1 and Project Option 2, which is not significant in EIA terms.

All other fleets: overall, the sensitivity of the receptors is considered to be low and the magnitude is deemed to be low for both Project Option 1 and Project Option 2. The significance of effect will, therefore, be slight for both Project Option 1 and Project Option 2, which is not significant in EIA terms.

16.5.3 Operational Phase

There are no changes to the operational phase assessment. Refer to Section 16.5.3 of Chapter 16 of the 2024 EIAR.

In summary, the significance of effect for the operational phase remains as follows:

- Impact 6: significant for Irish demersal otter trawlers; moderate for UK demersal otter trawlers; and slight for all other fleets.
- Impact 7: moderate for Irish and UK demersal otter trawlers, Irish potting vessels and Irish razor dredgers; and slight for all other fleets.
- Impact 8: moderate for Irish and UK demersal otter trawlers, Irish potting vessels and Irish razor dredgers; and slight for all other fleets.
- Impact 9: moderate for Irish and UK demersal otter trawlers, Irish potting vessels and Irish razor dredgers; and slight for all other fleets.
- Impact 10: moderate for Irish potting vessels; and slight for all other fleets.
- Impact 11: slight for Irish potting vessels and Irish pelagic trawl; and moderate for all other mobile fleets.

16.5.4 Decommissioning

With the exception of Impact 15 – Decommissioning activities leading to displacement or disruption of commercially important fish and shellfish resources, there are no changes to the construction phase assessment. Refer to Section 16.5.4 of Chapter 16 of the 2024 EIAR.

In summary, the significance of effect for the decommissioning phase remains as follows:

- Impact 12: very significant for Irish demersal otter trawl fleet; moderate for UK demersal otter trawl fleet; and slight for all other fleets.
- Impact 13: significant for Irish demersal otter trawl, Irish potting and Irish razor dredge fleets; moderate for UK demersal otter trawl fleet; and slight for all other fleets.
- Impact 14: significant for Irish and UK demersal otter trawl fleets; moderate for Irish potting and Irish razor dredge fleets; and slight for all other fleets.
- Impact 16: moderate for Irish potting fleet; and slight for all other fleets.
- Impact 17: slight for Irish potting and Irish pelagic trawl; and moderate for all other mobile fleets.

16.5.4.1 Impact 15 - Decommissioning activities leading to displacement or disruption of commercially important fish and shellfish resources

The change required in this section reflects both the updated Chapter 13 Fish and Shellfish Ecology assessment, informed by the sediment plume modelling undertaken in response to the RFI, and the design refinement for Project Option 1 and Project Option 2. As a result, the predicted effect on the fish and shellfish resource is reduced. Impact 15 in Chapter 16 of the 2024 EIAR is therefore deleted and replaced with the text below.

Significance of the effect

The effects of decommissioning activities are expected to be the same or similar to the effects from construction (Section 16.5.2.4). In light of the Chapter 13 Fish and Shellfish Ecology assessment, the magnitude of impact on nephrops and other commercially important fish and shellfish resources is considered to be low, and the significance of effect is therefore moderate for the Irish demersal otter trawl fleets for both Project Option 1 and Project Option 2, which is not significant in EIA terms; moderate for Irish potting and Irish razor dredge fleets for both Project Option 1 and Project Option 2, which is not significant in EIA terms; and slight for all other fleets for both Project Option 1 and Project Option 2, which is not significant in EIA terms.

16.6 Mitigation and Monitoring Measures

In response to RFI Section 12, the key change to this section is the progress in developing and implementing the SFC. Considering this, Table 16.11 of Chapter 16 of the 2024 EIAR shall be deleted and replaced with Table A16.5.

Table A16.5 Mitigation relating to commercial fisheries (replaces Table 16.11 of Chapter 16 of the 2024 EIAR)

Measure	Mitigation description
Construction	
Appendix A16.2: Fisheries Management and Mitigation Strategy (FMMS)	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (Nephrops norvegicus) within the array area during the construction phase of the proposed development. Under the NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided in Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry as detailed in Appendix C of the FMMS and will continue to be delivered through the FMMS, as it remains a live document. The FMMS includes the following key principles and measures relevant to construction: • **The proposed development will provide a Fisheries Liaison Strategy** The implementation of appropriate communication and information transfer strategies is of key importance to assist in minimising interference and facilitating effective co-existence with the fishing industry. The principles of liaison are that: – The Developer will undertake regular and routine communications via NtM to provide reasonable time (accounting for adverse weather etc.) to enable operational fishing business decisions to be made; – Continued engagement, constructive two-way communication and proactive dialogue between the fishers, their representatives and other fisheries stakeholders and the Developer is desired and is advantageous to all parties; and – All maritime operations that may have an effect on the commercial fishing sector will be made on a factual and accurate basis, in order to prevent unnecessary escalation of issues. • **The proposed development will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)** The FMMS provides a schedule for liaison and information dissemination. Notice and information will aim to be provided not less than 14 days prior for individual construction vessels mobilisations (where feasible) and weekly construction status updates will be provided. • **The Developer will minimise the size and duration of advisory safety zones during surveys and other works where safe and practicable to do so.** • **The Developer will provide local fisheries stakeholders with procedures for registering disruption payment claims for loss of/damage to fishing gear in association with surveys and construction activities of the proposed development.** • **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** • **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.**

Measure	Mitigation description
	• **Vessels involved in the construction, operation and maintenance and decommissioning of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** • **The proposed development will provide a Co-existence Strategy with an update provided in Appendix A16.2, which sets out the approach to maintaining and facilitating fishing activity within and around the array area. This includes the provision of designated trawling corridors aligned with the conventional trawling direction, consideration of over-trawlability and cable burial/protection standards to reduce snagging risk, and the development of operational protocols that recognise local tidal constraints and fishing practices. The strategy also includes a commitment to the monitoring of fishing access and catch rates, including through the proposed Digital Effort Traceability Project.** The Developer regards coexistence as the continuation of both the proposed development and fishing industry activities at the same time within and around the array area and along the ECC. Specifically, these commitments relate to: – Proposed development design, i.e. the location and coordination of all wind farm layout infrastructure and cable burial and protection; – The offshore development area represents only 36% of the full MAC boundary area and was reduced as a commitment by the Developer to ensure optimal seabed usage where possible, whilst ensuring the key other marine users are impacted as minimally as possible. This has been further reinforced through the refined Project Option 1 and Project Option 2 WTG layouts, which demonstrate an additional reduction in the spatial extent of offshore infrastructure within the array area, as set out in Appendix A5.1: Design Refinements; – Design of the array area that maximised corridors between turbines for navigation and orientated the turbines in an NNW - SSE direction to facilitate the direction of trawling in this area; – Appropriate notification of survey and construction activities to other marine users and the retention of a FLO and OFLO; – Appropriate lighting and marking of the proposed development and construction vessels; – Appropriate charting of the proposed development and notification of any hazards; and – The adoption of advisory safety zones and a process for marine coordination of all vessel activity. – Code of good practice for all vessels sets out measures for safe navigation, communication, vessel scheduling and reporting of any disruption. – Procedures in relation to gear fastening or loss; set out protocols for securing gear, reporting losses, retrieving lost gear and communicating any entanglement hazards. • **In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include:** – The Lighting and Marking Plan (Appendix A17.3); sets out the types, placement and intensity of lights, identification systems and protocols to ensure visibility and safety. – The Vessel Management Plan (VMP) (Appendix A17.2); sets out navigational safety measures for the proposed development, including use of advisory safety zones and guard vessels (as appropriate) – The Offshore Environmental Management Plan (EMP) (Appendix A6.1); includes a Dropped object procedure which sets out measures for risk assessment, reporting and retrieval protocols for dropped objects.
Sustainable Fisheries Community (SFC) (Appendix B within the FMMS Appendix A16.2)	• **The proposed development has established and is delivering a SFC as a mechanism for long-term, collaborative fisheries impact mitigation.** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. The SFC has been established as a formal, fisheries-led framework to support long-term coexistence between the proposed development and commercial fishing activity. It has been developed to provide a structured framework for consultation, mitigation, monitoring, adaptive management and, where relevant, compensation and community benefit initiatives. The SFC has been developed in parallel with the FMMS and is intended to remain active throughout the pre-construction and construction phases and into the operational phase of the proposed development, thereby ensuring that fisheries engagement and mitigation continue over the lifetime of the proposed development rather than being limited to the pre-consent stage.

Measure	Mitigation description
	The key aim is to establish a SFC focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development. The SFC is intended to provide a transparent and durable mechanism through which fisheries stakeholders can contribute to proposed development decision-making, the co-design of mitigation measures, and the review of monitoring outcomes. The arrangements developed to date include committee formation, Terms of Reference, Secretariat support and an independently administered fisheries funding mechanism. This ambition includes the following delivered throughout the lifetime of the proposed development: – Collaboration between the Developer and local fishing community. – Provide a definition of what is considered the local fishing community. – Deliver a proactive fisheries impact mitigation process. – Create a mechanism to deliver benefits, both to and from, the local fishing ports. – Work collaboratively to deliver enhancements to the local marine environment. – To, in a broad context, enhance the sustainability of the local fishing community. – Establish ways of collaboratively adding value to local seafood produce. – Support fisheries-led input into mitigation design, monitoring and adaptive management through a formal committee structure with seafood-sector representation. – Support strategic initiatives that improve the evidence base for fisheries coexistence, including spatial activity monitoring, traceability, low impact fisheries initiatives, coastal engagement and marine stewardship projects. The SFC will be adapted to focus on the commercial fishing industry in the long term through such measures such as enhancing stocks, improvements to fishing vessels, improvements that enhance the profit margins of sustainable fishing activities, and the development of new fisheries or other activities. In support of this role, an independently administered Fisheries Coexistence Fund has currently been established during the development phase to enable fisheries-related initiatives and to support broader resilience, diversification and sustainability objectives within affected coastal communities. Funding Round 1 has already supported projects including the DETP, a coastal education initiative, a low impact fishery pilot and a marine biodiversity mapping initiative, with additional pipeline projects approved in principle. Where construction related impacts occur, and where there are claims to be considered, the developer will require a significant level of supporting evidence for any such claims. It is for this reason that the Developer has gathered extensive fishing activity information, so as to ensure that this lengthy process can be expedited, for known fishers in the area. This evidence base is being strengthened through targeted consultation and fisheries-led data initiatives, including the DETP, which is intended to improve understanding of fishing activity, spatial footprint, displacement risk and sector dependency within and around the proposed development area. The Developer will develop a fair, transparent and evidence-based disturbance payment scheme for those fishers that can evidence disruption. The SFC is intended to support transparency in this process by improving the quality of fisheries engagement, strengthening the available evidence base and providing a structured forum through which mitigation, monitoring and any necessary adaptive measures can be discussed with the fishing community. Further information of the SFC is provided in the FMMS (Appendix A16.2). Further details on the development of the SFC, its framework arrangements, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.
Operation	
FMMS	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (Nephrops norvegicus) within the array area during operation. Under the NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided as Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry and will continue to be delivered through the FMMS as it remains a live document. The key principles and mitigation details are presented earlier in this table and the measures that are relevant to operation are: • **The Developer will provide a Fisheries Liaison Strategy** • **The Developer will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)**

Measure	Mitigation description
	• **The proposed development will minimise the size and duration of advisory safety zones during operation and maintenance and other activities where safe and practicable to do so.** • **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** • **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.** • **Vessels involved in the operation and maintenance of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** • **The proposed development will provide a Co-existence Strategy, with an update provided in Appendix A16.2.** • **In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include the VMP, LMP and Offshore EMP.**
SFC	• **The proposed development has established and is delivering a SFC as a mechanism for long-term, collaborative fisheries impact mitigation.** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. The SFC has now progressed beyond a proposed concept and has been established as a formal, fisheries-led framework to support long-term coexistence between the proposed development and commercial fishing activity. It has been developed to provide a structured framework for consultation, mitigation, monitoring, adaptive management and fisheries initiatives. The SFC has been developed in parallel with the FMMS and is intended to remain active throughout the pre-construction, construction and operational phases of the proposed development, thereby ensuring that fisheries engagement and mitigation continue over the lifetime of the proposed development rather than being limited to the pre-consent stage. The key aim is to establish a SFC focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development. The SFC is intended to provide a transparent and durable mechanism through which fisheries stakeholders can contribute to proposed development decision-making, the co-design of mitigation measures, and the review of monitoring outcomes. The arrangements developed to date include committee formation, Terms of Reference, Secretariat support and an independently administered fisheries funding mechanism. This ambition includes the following delivered throughout the lifetime of the proposed development, including the operational phase: – Collaboration between the Developer and local fishing community. – Provide a definition of what is considered the local fishing community. – Create a mechanism to deliver benefits, both to and from, the local fishing ports. – Work collaboratively to deliver enhancements to the local marine environment. – To, in a broad context, enhance the sustainability of the local fishing community. – Establish ways of collaboratively adding value to local seafood produce. – Support fisheries-led input into mitigation design, monitoring and adaptive management through a formal committee structure with seafood-sector representation. – Support strategic initiatives that improve the evidence base for fisheries coexistence, including spatial activity monitoring, traceability, low impact fisheries initiatives, coastal engagement and marine stewardship projects. The engagement with the local fisheries around the SFC has commenced and initiatives are being delivered, as described in Appendix B of Appendix A16.2. The SFC is now being taken forward as an active and ongoing mechanism for collaboration with the local fishing community, with further workstreams and longer-term initiatives to be developed and refined over time. Delivery of these broad-ranging benefits to the local fishing community, as relevant to the proposed development, will continue through construction and into the operational phase. Prior to the commencement of the operational phase, the SFC will be reviewed and, where necessary, updated to ensure that its framework, representation, workstreams and delivery mechanisms remain appropriate to the transition from construction into long-term operation and maintenance.

Measure	Mitigation description
	This review will take account of the final form of the authorised proposed development, relevant monitoring outputs, consultation feedback, experience from construction, and the practical requirements of operational coexistence. During the operational phase, the SFC will continue to function as a mechanism through which the Developer and fisheries stakeholders can review coexistence outcomes, monitoring evidence and any reported interactions over time, and identify any proportionate updates to mitigation or management measures where required. In this way, the SFC will support an evidence-led and adaptive approach to operational coexistence, rather than a fixed or one-off mitigation response. In support of this objective, an independently administered Fisheries Coexistence Fund has been currently established in the Development phase to enable fisheries-related initiatives and to support broader resilience, diversification and sustainability objectives within affected coastal communities. Funding Round 1 has already supported projects including the Digital Effort Traceability Project (DETP), a coastal education initiative, a low impact fishery pilot and a marine biodiversity mapping initiative, with additional pipeline projects approved in principle. The operational-phase role of the SFC is therefore expected to include continued support for fisheries liaison, review of monitoring and coexistence evidence, consideration of fisheries-led initiatives, and ongoing collaboration on practical measures that help maintain coexistence between the proposed development and commercial fishing activity over the life of the proposed development. Further details on the development of the SFC, its arrangements, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.
Decommissioning	
FMMS	This chapter has concluded significant impacts requiring additional mitigation for Irish demersal otter trawlers targeting Nephrops (Nephrops norvegicus) within the array area during decommissioning. Under the NMPF, where significant impacts are identified, a FMMS should be prepared (Fisheries Policy 2). This is provided as Appendix A16.2. The mitigation measures provided within the FMMS have been developed in consultation with the industry and will continue to be delivered through the FMMS as it remains a live document. The key principles and mitigation details are presented earlier in this table and the measures that are relevant to decommissioning are: • **The proposed development will provide a Fisheries Liaison Strategy** • **The proposed development will follow the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023)** • **The proposed development will minimise the size and duration of advisory safety zones during surveys and other works where safe and practicable to do so.** • **Vessels undertaking operations in relation to the proposed development will be working to appropriate safety management systems to ensure safe work practices.** • **Vessels undertaking operations in relation to the proposed development will only undertake activities prescribed in their line of work.** • **Vessels involved in the construction, operation and maintenance and decommissioning of the proposed development, including guard vessels and survey vessels, will be provided with the relevant lines of communication (as outlined within the FMMS) to minimise interaction with fishing vessels undertaking their normal activities.** • **The proposed development will provide a Co-existence Strategy, with an update provided in Appendix 16.2.** • **In addition to the commitments above, vessels undertaking operations in relation to the proposed development will be required to follow the mitigation and management measures provided in other documents and management plans committed to by the proposed development. These are referenced within the FMMS and include the VMP, LMP and Offshore EMP.** The FMMS is a live document and will be updated to reflect current (at the time of decommissioning) fishing practices and liaisons to reflect best practice at that point in time.
SFC	• **The proposed development has established and is delivering a SFC** The SFC is a mechanism to deliver long-term proactive fisheries impact mitigation through collaboration and mutual cooperation between the local fishing community and the Developer. It is a live document and will be updated to reflect the current fishing ahead of decommissioning commencing, to provide a mechanism for dealing with this transitional phase for the fisheries. The SFC is focused on the protection and enhancement of a locally sustainable fisheries and marine environment in the waters around the proposed development.

Measure	Mitigation description
	Further details on the development of the SFC, its framework arrangements, associated consultation and funded initiatives are provided in Appendix B and Appendix C of Appendix A16.2.

16.7 Residual Effects

There are no changes to this section. Refer to Section 16.7 of Chapter 16 of the 2024 EIAR.

16.8 Transboundary Effects

The key change to this section is to correct a typographical error within the 2024 EIAR. Considering this, Table 16.13 of Chapter 16 of the 2024 EIAR shall be deleted and replaced with Table A16.6.

Table A16.6 Potential transboundary effects on commercial fisheries receptors (replaces Table 16.13 of Chapter 16 of the 2024 EIAR)

Likely significant effect	Effect description	Effect significance – Project Option 1	Effect significance – Project Option 2
Effects on commercial fishing fleets as a result of impacts from the proposed development on commercial fish stocks in the waters of other EEA and non-EEA States.	Effects on biological resources could occur over a range of tens of kilometres from the offshore development area and could therefore interact with the following states: UK and Isle of Man.	Based on the assessment of effects on commercially important fish and shellfish resources, which concludes that effects would be localised, temporary or short-term and not significant in EIA terms, it is expected that any impact on stocks within the Irish EEZ would become negligible (which is not significant in EIA terms) in the context of the UK and Isle of Man EEZs, due to the distance of the proposed development from these EEZs and the dissipation of any stock-level effect over this distance.	Based on the assessment of effects on commercially important fish and shellfish resources, which concludes that effects would be localised, temporary or short-term and not significant in EIA terms, it is expected that any impact on stocks within the Irish EEZ would become negligible (which is not significant in EIA terms) in the context of the UK and Isle of Man EEZs, due to the distance of the proposed development from these EEZs and the dissipation of any stock-level effect over this distance.
Effects on commercial fishing fleets from all EEA countries as a result of constraints on foreign commercial fishing activities operating in the offshore development area, including demersal trawling, beam trawling, scallop dredging and other gears. These effects may include reduction in access to fishing grounds and potential displacement of fishing effort from the offshore development area to alternative fishing grounds in other EEA States, which will have direct implications to that fishing ground.	Effects on commercial fishing fleets could occur over a range of 100s of kilometres from the offshore development area (i.e. affecting fleets from other states that operate in the vicinity of the proposed development, including inside and outside of the territorial waters) and could therefore interact with non-Irish fishing fleets including UK, Isle of Man and Belgium.	Effects on these foreign commercial fishing fleets, in terms of reduction in access to fishing grounds and displacement into alternative grounds including other EEZs, have therefore been intrinsically considered throughout the commercial fisheries impact assessment process and are consistent to those presented in Sections 16.4.6 and 16.7.	Effects on these foreign commercial fishing fleets, in terms of reduction in access to fishing grounds and displacement into alternative grounds including other EEZs, have therefore been intrinsically considered throughout the commercial fisheries impact assessment process and are consistent to those presented in Sections 16.4.6 and 16.7.

There are no further changes to this section. Refer to Section 16.8 of Chapter 16 of the 2024 EIAR.

16.9 Cumulative Effects

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the Nationally Significant Infrastructure Projects (NSIP) (2024) guidance as per RFI Section 5.

The second paragraph shall be deleted;

"The Cumulative and Inter-Related Effects Chapter contains the outcome of Stage 1 Establishing the list of 'Other Existing and/or Approved Projects'; and Stage 2 'Screening of 'Other Existing and/or Approved Projects'. This section presents Stage 3, an assessment of whether the proposed development in combination with other projects, grouped in tiers, would be likely to have significant cumulative effects."

And replaced with:

Chapter 38**:** Cumulative and Inter-Related Effects contains the outcome of Stage 1 Establishing the list of 'Other Existing and/or Approved Projects'; Stage 2 'Screening of 'Other Existing and/or Approved Projects'; and provides the CEA conclusions in the NSIP Appendix 2: Matrix 1 – Assessment matrix. This section presents the full Stage 3 and Stage 4 assessment, which steps through whether the proposed development in combination with other projects, grouped in tiers, would be likely to have significant cumulative effects.

The fifth paragraph should be deleted;

"Given the location and nature of the proposed development, a tiered approach to establishing the list of other existing and/or approved projects has been undertaken in Stage 1 of the cumulative effects assessment. The tiering of projects is based on project relevance to the proposed development and it is not a hierarchical approach nor based on weighting. Further information on the tiers is provided in Section 11.10 and in the Cumulative and Inter-Related Effects Chapter."

And replaced with:

Given the location and nature of the proposed development, a tiered approach to establishing the list of other existing and/or approved projects has been undertaken in Stage 1 of the cumulative effects assessment. The tiering of projects is based on the NSIP 2024 guidance. Further information on the tiers is provided in Section 16.9.2 and in the Chapter 38.

There are no other changes required to this section. Refer to Section 16.9 of Chapter 16: Commercial Fisheries of the 2024 EIAR.

16.9.1 Commercial fisheries cumulative screening exercise

There are no changes to this section. Refer to Section 16.9.1 of Chapter 16: Commercial Fisheries of the 2024 EIAR.

16.9.2 Projects considered within the cumulative effect assessment

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5. Table 16.14 of Chapter 16 of the 2024 EIAR shall be deleted and replaced with Table A16.7.

Section 16.9.2 of Chapter 16 shall therefore be deleted in its entirety and replaced with:

The planned, existing and/or approved projects selected through the screening exercise as potentially relevant to the assessment of impacts to Commercial Fisheries are presented in Table A16.7. The tiers for the assessment are:

- Tier 1 is all existing submitted and approved projects (not yet in operation/part of baseline), including. the OMF option being considered which involves the adaption and leasing part of an existing port facility at Greenore (further detail is provided in the Chapter 6) and the East Coast Phase One Projects.
- Tier 2 is all projects that have scoping reports or have a MAC.

- Tier 3 is all other projects that have been identified in the relevant Development Plans and other plans and programmes as appropriate

The tiering structure is intended to provide an understanding of the potential for likely significant effects of the proposed development with the construction of all existing and submitted projects (tier one); followed by a cumulative assessment of the likely significant effect of that scenario combined with all projects that have a scoping report or Maritime Area Consent (MAC) (tier two); and lastly the combination of tier one and tier two with tier three, which is all other projects that have been identified in the relevant Development Plans and other plans and programmes which have been screened in.

Table A16.7 Projects and plans considered within the cumulative impact assessment (replaces Table 16.14 in Chapter 16 of the 2024 EIAR)

Development type	Project	Status	Data confidence	Distance to the proposed development		Justification for screening into the cumulative effects assessment
				Array area	ECC	
Tier 1						
Phase One Offshore wind farm	Oriel Wind Park	Pre-consent	High	16.9km	21.6km	Within ZoI and overlap in construction period.
	Dublin Array Offshore Wind Farm	Pre-consent	High	32.9km	37.6km	Within ZoI and overlap in construction period.
	Codling Wind Park	Pre-consent	High	50.9km	56.9km	Within ZoI and overlap in construction period.
	Arklow Bank Phase 2	Pre-consent	High	76.4km	80.0km	Within ZoI and overlap in construction period.
Phase One Export Cable Corridors	Oriel ECC	Pre-consent	High	18.1km	22.6km	Within ZoI and overlap in construction period.
	Dublin Array ECC	Pre-consent	High	41.92km	42.15km	Within ZoI and overlap in construction period.
	Codling Wind Park ECC	Pre-consent	High	35.71km	31.14km	Within ZoI and overlap in construction period.
	Arklow Bank Wind Park 2 ECC	Pre-consent	High	75.47km	79.21km	Within ZoI and overlap in construction period.
Offshore Wind farms	Mona	Consented	High	117.5km	124.8km	Within ZoI and overlap in construction period.
	Mooir Vannin (Isle of Man)	Pre-consent	High	118.3km	126.8km	Within ZoI and overlap in construction period.
	Morecambe	Consented	High	142.6km	150.0km	Within ZoI and overlap in construction period.
Surveys	Site investigation activities to inform the development of the North Irish Sea Array (NISA) offshore windfarm (OWF) and export cable, off the coasts of counties Dublin, Meath and Louth.	Approved	High	0km	0km	Within ZoI and overlap in construction period.
	MaresConnect Electricity Interconnector Site Investigation (Portmarnock to Ardgillan, Dublin)	Approved	High	10.4km	18.0km	Within ZoI and overlap in construction period.

Development type	Project	Status	Data confidence	Distance to the proposed development		Justification for screening into the cumulative effects assessment
				Array area	ECC	
	CWPL intends to undertake survey mobilisations at the proposed Licence Area to inform the location and detailed design of the proposed CWP OWF, export cable route, potential operations and maintenance base, potential land reclamation area at the potential onshore substation location, and additional buffer zones. SITE A	Approved	High	34.7km	31.6km	Within ZoI and overlap in construction period.
	Site Investigation - Dublin Array at Kish and Bray Banks	Approved	High	35.2km	31.3km	Within ZoI and overlap in construction period.
	CWPL intends to undertake survey mobilisations at the proposed Licence Area to inform the location and detailed design of the proposed CWP OWF, export cable route, potential operations and maintenance base, potential land reclamation area at the potential onshore substation location, and additional buffer zones. SITE B	Approved	High	36.0km	31.1km	Within ZoI and overlap in construction period.
	LirlC Interconnector	Pre-consent	High	112.0km	118.2km	Within ZoI and overlap in construction period.
Tier 2						
Offshore Wind farms	North Channel Wind 2	Pre-consent	High	112.9km	120.0km	Within ZoI and overlap in construction period.
	North Channel Wind 1	Pre-consent	High	135.4km	141.7km	Within ZoI and overlap in construction period.
Subsea Cables	Mares Connect	Pre-consent	High	6.02km	12.3km	Within ZoI and overlap in construction period.
Survey	Foreshore licence application for a gas pipeline trenchless crossing of River Tolka, Dublin	Approved	High	35.8km	29.5km	Within ZoI and overlap in construction period.

16.9.3 Project impacts included in the assessment

The change in this section is limited to the update replacing Table 16.15 with A16.8; this table reflects the update to impacts considered within this Chapter and the updated cumulative effects assessment that has been undertaken in response to RFI Section 5.

Table A16.8 Potential cumulative impacts and tiers for assessment (replaces Table 16.15 in Chapter 16 of the 2024 EIAR)

Potential cumulative impact	Phase	Tiers and projects	Justification for inclusion in cumulative effects assessment
1. Reduction in access to, or exclusion from established fishing grounds	Construction/ Operation/ Decommissioning	Tier 1 – Phase One Projects (4), Phase One ECC (4), other offshore wind farms (3), subsea cables (1), surveys (5) Tier 2 – Offshore wind farms (2), subsea cables (1), surveys (1) Tier 3 – No projects	The location and nature of activities involved in the construction, operation and/or decommissioning of the projects has the potential to cause disruption to fishing activities.
2. Displacement leading to gear conflict and increased fishing pressure on established fishing grounds			
3. Displacement or disruption of commercially important fish and shellfish resources			

16.9.3.1 Cumulative Impact 1 - Reduction in access to, or exclusion from established fishing grounds

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

Section 16.9.3.1 of Chapter 16 shall therefore be deleted in its entirety and replaced with:

Tier 1

The Tier 1 projects include four Phase One Offshore Wind Farms: Oriel, Dublin Array, Arklow and Codling Wind Park. Oriel is located north west of the proposed development and is at the north-western edge of the extent of nephrops grounds. Through the Phase One Offshore Wind Farm Collaboration (refer to Appendix A1.2) it was confirmed by Oriel Wind Park that the project's infrastructure is outside the nephrops area on hard ground and the closest spawning or nursery areas are 6km south and east from the Oriel offshore wind farm area boundary. Therefore, for the nephrop fisheries all potential impacts were assessed as not significant. Oriel has also prepared an FMMS which will be submitted with their planning application. It is, therefore, not expected that Oriel will cause impacts higher than those assessed for the proposed development alone reduction in access impacts for the nephrops demersal otter trawl fleets (Irish and UK), Irish potting fleet and all other commercial fishing fleets. This conclusion is valid for both Project Option 1 and Project Option 2.

The locations of the other Phase One Projects do not support a nephrops trawl fishery and have no further cumulative impact to the Irish demersal otter trawl (nephrops) fleet. Dublin Array, Codling Wind Park and Arklow support an active Irish potting fleet targeting whelk across their wind farm and/or ECC boundaries. Given the low level of whelk potting within the proposed development, this is not expected to raise the cumulative effect beyond that assessed for proposed development alone impacts.

In addition, Mona, Mooir Vannin and Morecambe have also been considered within Tier 1. These projects support fisheries which differ from the key fleets operating across the proposed development area. Mona supports queen scallop and king scallop fisheries, Mooir Vannin supports a king scallop fishery, and Morecambe supports a whelk potting fishery. As these fisheries do not materially overlap with the main fleets operating across the proposed development, particularly the Irish and UK demersal otter trawl nephrops fishery and the local fleets of primary relevance to the proposed development, they are not expected to increase the cumulative effect beyond that already assessed for the proposed development alone.

The survey activities are site investigation activities to inform the development of the proposed development of offshore wind farm and export cable off the coasts of counties Dublin, Meath and Louth; MaresConnect Electricity Interconnector site investigation (Portmarnock to Ardgillan, Dublin); survey mobilisations by CWPL to inform the location and detailed design of the proposed CWP OWF, export cable route, potential operations and maintenance base, potential land reclamation area at the potential onshore substation location, and additional buffer zones at Site A; and survey mobilisations by CWPL for the same purposes at Site B. These survey projects are localised and temporary in nature and are not expected to give rise to interaction pathways that would increase the cumulative effect beyond that already assessed for the proposed development alone.

Overall, given the grounds targeted across the region, including within Tier 1 projects, the sensitivity of the Irish demersal otter trawl (nephrops), Irish potting fleet and all other fleets is judged to be low and the magnitude of impact for all commercial fishing fleets is assessed as low. This takes account of the discrete nephrops grounds which overlap the proposed development but are not widespread across the cumulative study area and/or across Tier 1 projects.

Therefore, the significance of effect from the reduced access, or exclusion from established grounds from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight for all other fleets, which is not significant in EIA terms.

Tier 1 and 2

The Tier 2 projects include two other offshore wind farms, one subsea cable project and one survey activity. The offshore wind farm projects comprise North Channel Wind 1 and North Channel Wind 2. The subsea cable project is Mares Connect. The survey activity is site investigation activities to inform a foreshore licence application for a gas pipeline trenchless crossing of River Tolka, Dublin.

While detailed fisheries information is limited for some of these projects, they have been included in the assessment on the basis of reasonable assumptions regarding their location, footprint and the potential overlap with commercial fishing activity. North Channel Wind 1 and North Channel Wind 2 are not understood to overlap materially with the key Irish and UK demersal otter trawl nephrops fishery or the principal local fleets operating across the proposed development. Similarly, the subsea cable and survey projects are localised and temporary in nature and are not expected to give rise to interaction pathways that would increase the cumulative effect beyond that already assessed for the proposed development alone.

Overall, due to the lack of overlap with the fisheries active in the local study area and proposed development, it is considered unlikely that the Tier 3 projects will raise the cumulative magnitude of impact to any higher than the proposed development alone effects for the nephrops demersal otter trawl fleets (Irish and UK), Irish potting fleet and all other commercial fishing fleets, for either Project Option 1 or Project Option 2.

Therefore, the significance of effect from the reduced access, or exclusion from established grounds from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1 and Tier 2 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight for all other fleets, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 1.

Therefore, the significance of effect from the reduced access, or exclusion from established fishing grounds from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1, 2, and 3 projects (all Tiers) is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight for all other fleets, which is not significant in EIA terms.

16.9.3.2 Cumulative Impact 2 – Displacement leading to gear conflict and increased fishing pressure on established fishing grounds

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

Section 16.9.3.2 of Chapter 16 shall therefore be deleted in its entirety and replaced with:

Tier 1

The effect of displacement leading to gear conflict and increased fishing pressure is directly correlated to the previous impact of reduced access to fishing grounds (i.e. if there is no reduction in access, then there will be no displacement). There is a low magnitude of impact for reduced access to fishing grounds from Tier 1 projects and therefore displacement is not expected. As such the magnitude of impact of displacement is assessed as low for all fleets.

The sensitivity of the receptors is consistent with the assessment of reduced access to fishing grounds, which is assessed as low for the Irish demersal otter trawl (nephrops), Irish potting fleets and all other commercial fishing fleets. Therefore, the significance of effect from displacement leading to gear conflict and increased fishing pressure from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

Tier 1 and 2 (All tiers)

As per the justification for Impact 1 above, the Tier 2 projects do not raise the magnitude of impact above that of Tier 1 projects in terms of reduced access. Therefore, the significance of effect from displacement leading to gear conflict and increased fishing pressure from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1 and 2 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 2.

Therefore, the significance of effect from displacement leading to gear conflict and increased fishing pressure from the installation of either Project Option 1 or Project Option 2 cumulatively with the Tier 1,2 and 3 projects (all Tiers) is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

16.9.3.3 Cumulative Impact 3 - Displacement or disruption of commercially important fish and shellfish resources

The key changes to this section are the updating of text to reflect the minor change in cumulative assessment methodology to follow the NSIP 2024 guidance, as per RFI Section 5.

Section 16.9.3.3 of Chapter 16 shall therefore be deleted in its entirety and replaced with:

Tier 1

Cumulative effects for fish and shellfish ecology have been assessed in the Fish and Shellfish Ecology Chapter covering the following effects:

- Increased suspended sediments.
- Habitat loss and disturbance
- Noise (and associated barrier effects); and
- Barriers to movement through the presence of EMF from cables.

All of the above cumulative effects on the populations of fish and shellfish receptors were found to be indistinguishable from the proposed development alone effects, for either Project Option 1 or Project Option 2.

Two key aspects when considering this cumulative effect in relation to the proposed development are that:

- The array area overlaps with a highly important nephrops fishery, with which the other Tier 1 projects do not overlap, with the exception of Oriel Wind Park, which is located on the north-western edge of these nephrops fishing grounds.

- As outlined in Section 16.9.3.1, through the Phase One Offshore Wind Farm Collaboration (refer to Appendix A1.2) it was confirmed by Oriel Wind Park that the project's infrastructure is outside the nephrops area on hard ground and the closest spawning or nursey areas are 6km south and east from the Oriel offshore wind farm area boundary. Therefore, for the nephrop fisheries all potential impacts were assessed as not significant. Oriel has also prepared an FMMS which will be submitted with their planning application.

Overall, it is considered unlikely that the Tier 1 projects will raise the cumulative effect to any higher than the proposed development alone for either Project Option 1 or Project Option 2 in terms of displacement or disruption to commercial important resources based on the following key findings from the Fish and Shellfish Ecology Chapter:

- Cumulative effects of increased suspended sediments are not expected to be higher than project alone effects for fish and shellfish resources.
- Cumulative effects of underwater noise and vibration are concluded to result in at most barely discernible changes to baseline conditions and result in a slight (adverse) effect to resources.
- Cumulative effects of loss and disturbance to habitat are considered to result in at most barely discernible changes to fish and shellfish receptors.
- Cumulative behavioural effects of electro- and magneto-sensitive fish and shellfish receptors are concluded to result in at most barely discernible changes to baseline conditions.

Therefore, the significance of effect from displacement or disruption to commercial important resources from either Project Option 1 or Project Option 2 cumulatively with the Tier 1 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

Tier 1 and 2 (All tiers)

Overall, it is considered unlikely that the Tier 2 projects will raise the cumulative magnitude of impact to any higher than the proposed development alone effects, for either Project Option 1 or Project Option 2. This is because other Tier 2 projects are not considered to effect the commercial fisheries receptors under assessment. Therefore, the significance of effect from displacement or disruption to commercial important resources from either Project Option 1 or Project Option 2 cumulatively with the Tier 1 and Tier 2 projects is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

Tier 1 and 2 and 3 (All tiers)

No Tier 3 projects have been screened into the assessment of Cumulative Impact 3.

Therefore, the significance of effect from displacement or disruption to commercial important resources from either Project Option 1 or Project Option 2 cumulatively with the Tier 1, 2 and 3 projects (all Tiers) is expected to be moderate to slight for the Irish demersal otter trawl (nephrops) and Irish potting fleets and slight effect for all other fleets, which is not significant in EIA terms.

16.10 References

As a result of new information, the following references are added:

Department of Transport / Irish Coast Guard (2025). The Maritime Navigation Safety & Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI). Published 4 June 2025 and updated 24 September 2025.

Maritime Area Regulatory Authority (MARA) (2025). Guidance Note for Applicants applying for a Maritime Area Consent (MAC).

Seafood/ORE Working Group (2024). Seafood/ORE Working Group Annual Report 2024.

Seafood/ORE Working Group (2025). Seafood/ORE Working Group Annual Report 2025.

Seafood/ORE Working Group (undated). Dispute Resolution Mechanism (DRM).

Seafood/ORE Working Group (undated). Use of Fishing Vessels for Commercial Work on ORE Projects – A Guide to Registration.

Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) (2025). Best Practice Guidance for Offshore Renewables Developments.

There are no other changes to this section. Refer to Section 16.10 of Chapter 16: Commercial Fisheries of the 2024 EIAR.