
Re: Request for observations - Notice of Significant Further Information: North Irish Sea Array (NISA)

From OHiggins, Brian <Brian.OHiggins@agriculture.gov.ie>
Date Tue 10/20/2026 4:49 PM
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 3 attachments (622 KB)

DAFM Return - NISA SFI.pdf; BIM obs.pdf; MI obs.pdf;

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Good Afternoon All,

Please see the DAFM response attached in relation to Request for observations - Notice of Significant Further Information: North Irish Sea Array (NISA) Offshore Wind Farm (Ref: ABP-319866-24).

Please also see attached, the responses from the marine Agencies: The Marine Institute and Bord Iascaigh Mhara for further information.

We would be grateful if you could acknowledge receipt of this mail for our own records.

Regards

Brian O'Higgins

Administrative Officer, Seafood Climate Unit, Inshore and Seafood Climate & Environmental Division

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

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Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid.

D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.



20 October 2026
marine@pleanala.ie

Re: Notice of Significant Further Information: North Irish Sea Array (NISA) Offshore Wind Farm

A Chara,

The Marine Divisions of the Department of Agriculture, Food, and the Marine (DAFM) welcome the opportunity to provide comments on the significant further information supplied in respect of North Irish Sea Array (NISA) Offshore Wind Farm, supplied to An Commisiún Pleanála by the developer, in response to the public consultation.

DAFM wishes to stress at the outset that commercial sea fishing is a long standing, pre-existing, and traditional activity in the marine environment. The evaluation of potential impacts of the proposed development on commercial sea fishing activities and the seafood sector as a whole need to be considered within the context of the requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework.

The principles in the National Marine Planning Framework (NMPF) of ***avoiding, minimising, or mitigating impacts on access to existing activities*** (including specific policies on fisheries and aquaculture) should be followed and any proposed development activity should incorporate the principle of maximising coexistence with established activities in marine areas. ***Please note, to comply with the NMPF, it should be stressed that avoidance of adverse impacts on existing fisheries should always be the default position when implementing ORE and its cable connections to land, and where this is absolutely not possible, actions to minimise and mitigate adverse effects, in that order, should follow.***

To inform the DAFM comments, the observations of the Marine Institute (MI) and Bord Iascaigh Mhara (BIM) on the application were requested. These have been summarised below.

Marine Institute Response:

The MI advise that the responses provided following the requests for further information appear substantive and complete. The MI advise that while some impacts to fish, fishing and aquaculture, are acknowledged to be potentially significant, they are reported as being able to be mitigated through the mitigation plan and compensated for – at least during construction by the development.



The MI note that impacts to fish and the marine ecology are difficult to quantify at this stage, however, **it should be recognised that there will be impacts to both fish and marine ecology, and fishing activities. The developer downplays responsibility for monitoring of such which is recommended by the MI.**

The MI acknowledge the inclusion of further information on impacts to fishing activity, however, there is little certainty and no quantification of how development activities will impact, and to what extent co-existence will operate. The MI advise that *Nephrops* fishing activities remain the most likely to be impacted, while the cable corridor will cross inshore vessel fishing grounds – dredging, potting, and gillnetting. While the area of fishing grounds covered by the development and that defined as expected inaccessible to fishing operations is small (5% of the array area), displacement of activity may be expected, likely to the remaining *Nephrops* grounds.

The MI note updated *Fisheries Management and Mitigation Strategy (FMMS)* that includes a detailed Co-existence Strategy, supported by a Technical Co-existence Assessment which proposes that co-existence between commercial fisheries and the development is technically possible however the MI highlight that such coexistence is not as yet a certainty.

Bord Iascaigh Mhara Response:

BIM note that the additional information submitted by the applicant seeks to address An Commisiún Pleanála's request for further information regarding commercial fisheries, specifically in relation to coexistence of fisheries in the array and cable corridors and the cumulative effects on the displacement of fishing effort during operational activities.

BIM has undertaken several projects to inform the evidence base for marine spatial planning developments including offshore wind projects. BIM's participatory mapping work has generated spatial data from skippers to improve understanding of under 12m fishing activity for MSP purposes (Tray et al. 2026). Additionally, BIM completed a study examining how fisheries and offshore wind farms interact across European waters (Cosgrove et al. 2026). **The report analyses static and towed gear fishing activity and 88 offshore wind farms over a 12-year period, providing an important evidence base to support marine spatial planning in Ireland.** BIM's recent work on both spatial fisheries data and OWF fisheries interactions informs the observations set out in their submission, and these findings are referred to where relevant.

BIM note the applicant's commitment to a range of fisheries mitigation, monitoring, and engagement measures, including fisheries liaison, coexistence initiatives, and adaptive management arrangements. BIM welcome measures that support the collection of fisheries information and ongoing engagement with the fishing sector throughout the project lifecycle. However, BIM state that much of the applicant's response remains reliant on proposed management measures and future monitoring rather than demonstrated evidence from operational offshore wind projects, **meaning uncertainty remains regarding long-term fisheries access and displacement outcomes.**



In relation to the FMMS, BIM notes that **the applicant should provide the evidence and fisheries input underpinning the 850 m trawlable corridor approach and demonstrate how technical feasibility will translate into real fishing access.**

BIM also note that it is stated in the Non-Technical Summary that impacts on Irish potting (static-gear) fleets are not significant. However, BIM stress that there is a lack of comprehensive spatial data on Ireland's under-12 m fleet, which includes potting (Tray et al., 2026). **The conclusion of no significant effects on potting fleets should be appropriately qualified where the underlying data do not comprehensively represent this sector.**

BIM notes positively the detailed consideration of access restrictions, displacement, gear conflict, and fishing pressure; however, **the conclusion that cumulative fisheries effects remain not significant is dependent on assumptions regarding future coexistence, continued fishing access within the array and the effectiveness of proposed mitigation measures.**

BIM further notes that fishing activity, particularly that of smaller vessels, may not always be fully reflected in conventional fisheries datasets (Tray et al. 2026 & Cosgrove et al. 2026). **Uncertainty remains regarding the extent to which the proposed mitigation measures will prevent displacement of fishing effort and facilitate meaningful long-term coexistence between commercial fisheries and similar offshore wind developments.**

Seafood sector and food security

Fishers and aquaculture site holders are primary food producers dependent upon certain marine areas which are particularly important for food production. This primary production is critical to supplying the downstream indigenous seafood processing and export industries and in sustaining the livelihoods of coastal communities. The importance of these primary and secondary food production activities is reflected in the Government's Food Vision 2030 policy.

Food Vision 2030 recognises and values the role of primary food producers. The contribution of the seafood sector to food security is of high importance.

Seafood as a source of protein is vital to our food security and the sustainable management of the sector will also contribute to reducing our carbon emissions. The importance of our seafood sector should be taken into consideration when individual ORE plans and projects are being implemented and adverse cumulative effects on the sector avoided as much as possible.

Inshore Fishing

Inshore vessels operating from Balbriggan, Skerries and other harbours and ports along the Dublin, Meath and Louth coast are particularly reliant on grounds within and adjacent to the proposed development.



A variety of fishing activities take place within and adjacent to the proposed development site and along the export cable corridor, including pot fishing (mainly for whelk, and also for lobster and crab, which are some of the most significant stocks fished by the inshore fleet), net/bottom trawl, line, and dredge fisheries for razor clam and king scallop in the vicinity ([Ireland's Marine Atlas](#)). The Marine Institute has also identified the Nephrops (Dublin Bay prawn) fishery as the fishery most likely to be impacted by the development – Nephrops are the second most valuable species to the Irish fleet.

A challenge for the inshore fleet is that vessels under 12 metres are mostly not currently required to carry Vessel Monitoring Systems (VMS) – this will only become mandatory from 10th January 2028. This means their activities are less visible in official data, and the true scale and patterns of inshore fishing are not fully captured. This is reflected in the developer's baseline, which relies on VMS data from 2014 to 2018, Ireland's Marine Atlas for vessels under 15 metres, and three 14-day vessel traffic surveys, which are unlikely to capture the seasonal patterns of inshore potting and dredging. The developer has proposed the selective implementation of inshore VMS to improve baseline data, and a Digital Effort Traceability Project to monitor fishing access and catch rates. It is important that any such monitoring is sufficiently comprehensive and transparent to accurately reflect fishing patterns and address concerns raised by the industry regarding coverage and data reliability.

DAFM welcomes the ongoing engagement with the Seafood/Offshore Renewable Energy (ORE) Working Group and acknowledges that a Fisheries Liaison Officer (FLO) has been in situ since 2019. Active, timely consultation and engagement with inshore fishing representatives continues to be vitally important for ensuring optimum coordination of activities, to limit disturbance, and to avoid displacement which may increase fishing pressure and competition in other areas. Notices to Mariners should be issued as early as practicable and with sufficient notice to allow static gear, such as pots and nets, to be relocated safely.

DAFM acknowledges the design refinements proposed to reduce the likely impact on fisheries, including using suction bucket jackets (SBJs) and the array layout, to maximise corridors between the turbines and orientate the layout to allow a conventional trawling direction of NNW-SSE in the area. However, as noted by BIM, there remains uncertainty on the effectiveness of these trawl corridors. **The Department supports the request from BIM for the developer to provide the evidence and fisheries input underpinning the corridor approach and demonstrate how technical feasibility will translate into tangible fishing access.** The proposed trawl corridors should be tested with local skippers under realistic tidal and operational conditions before the final layout is fixed.

The developer reviewed the potential cumulative impact of this proposed development along with other ORE developments in the Irish Sea and found the effect of displacement leading to gear conflict and increased fishing pressure on established fishing grounds to be slight and not significant in EIA terms. **DAFM does not consider that this conclusion adequately reflects the likely effects on the Irish fleet.** As the Marine Institute has noted, **displacement of fishing effort is expected and will increase fishing pressure and competition in adjacent areas, with smaller**



vessels that cannot travel beyond their main area of activity most affected. These effects will be compounded by the other Phase One ORE projects in the Irish Sea.

Consistent with the NMPF, where the views of the fishing industry diverge from those of the developer, these should be fully explained in the FMMS and dissenting views given a platform within it.

Finally, and as stated earlier, the MI and BIM have provided detailed observations on the further information which have been attached to the DAFM submission. DAFM supports the advice and recommendations provided in these documents and reminds again that it is critical that development is informed by the specific intensity of fishing in the proposed area, and that the developers need to **work closely and constructively with our seafood sector to ensure that any adverse impacts are avoided, minimised or mitigated, in that order, in accordance with requirements set out under the Maritime Area Planning Act and the National Marine Planning Framework.**

Yours sincerely,

Marine Divisions

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food, and the Marine

References

Tray, E., Huck, J., Cosgrove, R., 2026. Generation of spatial data on small vessel activities using a novel fisheries participatory geographic information system. Ecol. Inform. 96, 103807. <https://doi.org/10.1016/j.ecoinf.2026.103807>

Cosgrove, R., Tray, E., Murphy, S., Minto, C., 2026. Interactions between Offshore Wind Farms and Fisheries in European waters (Marine Spatial Planning Report). Bord Iascaigh Mhara. <https://bim.ie/wp-content/uploads/2026/05/Interactions-between-offshore-wind-farms-and-fisheries-final-report.pdf>

October 9th 2026

**BIM Observations on Response to ACP Request for Further Information
(North Irish Sea Array Offshore Wind Farm (ABP-319866-24))**

Bord Iascaigh Mhara (BIM) is Ireland's seafood development agency, with a broad remit to support the sustainable development of Ireland's seafood sector and the sustainable use of marine resources. BIM provides scientific, technical and advisory expertise across a range of areas relevant to the fishing industry, including fisheries management and conservation, marine spatial planning, environmental interactions and the assessment of activities that may affect the marine environment and those who depend upon it.

BIM notes that the additional Information submitted by the applicant seeks to address ACPs request for further information regarding commercial fisheries, specifically in relation to coexistence of fisheries in the array and cable corridors and the cumulative effects on the displacement of fishing effort during operational activities.

BIM has undertaken projects to inform the evidence base for marine spatial planning (MSP) developments including offshore wind projects. BIM's participatory mapping work has generated spatial data from skippers to improve understanding of under 12m fishing activity for MSP purposes (Tray et al. 2026). Additionally, BIM completed a study examining how fisheries and offshore wind farms interact across European waters (Cosgrove et al. 2026). The report analyses static and towed gear fishing activity and 88 offshore wind farms over a 12-year period, providing an important evidence base to support marine spatial planning in Ireland. BIM's recent work on both spatial fisheries data and OWF fisheries interactions informs the observations (**Table 1**) set out in this submission, and these findings are referred to where relevant.

References

- Tray, E., Huck, J., Cosgrove, R., 2026. Generation of spatial data on small vessel activities using a novel fisheries participatory geographic information system. Ecol. Inform. 96, 103807.
<https://doi.org/10.1016/j.ecoinf.2026.103807>
- Cosgrove, R., Tray, E., Murphy, S., Minto, C., 2026. Interactions between Offshore Wind Farms and Fisheries in European waters (Marine Spatial Planning Report). Bord Iascaigh Mhara.
<https://bim.ie/wp-content/uploads/2026/05/Interactions-between-offshore-wind-farms-and-fisheries-final-report.pdf>

Table 1. BIM's observations on the documents referenced in the request for review:

Document Name	BIM Observation
Submission Response Report (Commercial Fisheries responses, MI response, Isle of Man response)	The applicant has provided a comprehensive response framework addressing fisheries concerns and has expanded its discussion of coexistence, mitigation and cumulative effects. However, much of the response remains reliant on proposed management measures and future monitoring rather than demonstrated evidence from operational offshore wind projects, meaning uncertainty remains regarding long-term fisheries access and displacement outcomes. BIM notes that findings from its reports (Cosgrove et al. 2026) highlight ongoing uncertainty regarding long-term fisheries access, displacement of fishing effort

	and the practical implementation of coexistence measures for an offshore windfarm. As such, BIM considers that continued monitoring, stakeholder engagement and adaptive management will be important in evaluating the effectiveness of the proposed measures throughout the operational life of the project.
Appendix A16.2 Fisheries Management and Mitigation Strategy (FMMS)	The FMMS represents a substantial enhancement of the application and provides a structured framework for fisheries liaison, coexistence, disturbance claims, monitoring and adaptive management. BIM welcomes the development of the Sustainable Fisheries Community (SFC), Fisheries Liaison Strategy and Co-existence Strategy, but notes that the effectiveness of these measures will depend on implementation, long-term resourcing and meaningful participation by affected fishing interests throughout the project lifecycle. In the Technical Coexistence Assessment section, BIM notes the developer's conclusion that coexistence is technically achievable through measures including the proposed trawl corridor. However, uncertainty remains regarding whether the proposed 850 m trawlable corridor will translate into sustained commercial fishing activity in practice. The applicant outlines that a 28 m trawler can be technically accommodated but does not provide empirical evidence that such corridors have successfully supported fishing in existing comparable OWFs, or that the proposed layout has been tested with local skippers under realistic tidal and operational conditions. This is relevant given BIM's report (Cosgrove et al. 2026), which found substantial reductions in towed-gear effort within OWF footprints post-construction. BIM therefore considers that the applicant should provide the evidence and fisheries input underpinning the corridor approach and demonstrate how technical feasibility will translate into real fishing access.
Non-Technical Summary (pp.38-39)	The NTS identifies a significant operational effect on Irish demersal otter trawlers. Unlike UK demersal otter trawlers, for which a residual "not significant" conclusion is stated, no residual conclusion is given for Irish trawlers. The NTS provides a statement that the mitigation measures will mitigate any significant effects. BIM's report (Cosgrove et al. 2026) found that towed-gear effort fell by 76% in UK OWF extents where there are no mandatory exclusion zones. This suggests that reduced trawl access and use could persist despite the proposed mitigations. The NTS concludes that impacts on Irish potting (static-gear) fleets are not significant. However, there is a lack of comprehensive spatial data on Ireland's under-12 m fleet, which includes potting (Tray et al., 2026). The conclusion of no significant effects on potting fleets should be appropriately qualified where the underlying data do not comprehensively represent this sector.
Chapter 16 Commercial Fisheries	The revised assessment incorporates updated datasets, additional consultation, NSIP-aligned cumulative assessment methodology and an expanded fisheries mitigation framework. BIM notes positively the detailed consideration of access restrictions, displacement, gear conflict and fishing pressure; however, the conclusion that cumulative fisheries effects remain not

	significant is dependent on assumptions regarding future coexistence, continued fishing access within the array and the effectiveness of proposed mitigation measures. BIM further notes that fishing activity, particularly that of smaller vessels, may not always be fully reflected in conventional fisheries datasets (Tray et al. 2026 & Cosgrove et al. 2026) . Uncertainty remains regarding the extent to which the proposed mitigation measures will prevent displacement of fishing effort and facilitate meaningful long-term coexistence between commercial fisheries and OWFs.
Chapter 36 Mitigation, Monitoring and Residual Effects (pp.15-23)	BIM notes the applicant's commitment to a range of fisheries mitigation, monitoring and engagement measures, including fisheries liaison, coexistence initiatives and adaptive management arrangements. BIM's reports (Tray et al., 2026 & Cosgrove et al., 2026) highlight the importance of continued monitoring, stakeholder engagement and the development of robust evidence to improve understanding of fisheries interactions and coexistence outcomes over time. BIM welcomes measures that support the collection of fisheries information and ongoing engagement with the fishing sector throughout the project lifecycle.
Chapter 37 Transboundary Effects (p.4)	The applicant concludes that transboundary fisheries effects on UK, Isle of Man and other foreign fleets would be localised and not significant. BIM notes that transboundary fishing activity has been recognised within the assessment and continued engagement with affected external fisheries interests will remain important where access changes.
Appendix A3.1 NMPF Compliance Report (pp.2, 24, 34-36)	The response to Fisheries Policy 1 refers the reader to the Commercial Fisheries Chapter, lists the fleets assessed, and asserts that all residual effects will be not significant once the FMMS is implemented. BIM's reports (Tray et al., 2026 & Cosgrove et al., 2026) highlight the importance of continued monitoring, stakeholder engagement and the development of robust evidence to improve understanding of fisheries interactions and coexistence outcomes over time regarding the revised FMMS.
Chapter 38 Cumulative and Inter-related Effects (pp.38.41- 38.44)	The applicant has revised the cumulative assessment following the Board's request and has included the Irish Sea Phase One projects within a structured assessment framework. BIM notes that understanding cumulative effects remains an uncertain aspect of offshore renewable developments.
Appendix A16.1 Commercial Fisheries Technical Report	The updates presented in this addendum are primarily revised baseline fisheries data, including landing statistics and stock assessment information, while the Fishing Spatial Activity Mapping section remain unchanged from the original assessment.
Request for Further Information Response Report (pp.70-72)	See comment for the Appendix A16.2 Fisheries Management and Mitigation Strategy (FMMS)