codling wind park

Fisheries Management and Mitigation Strategy

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wind park

This Fisheries Management and Mitigation Strategy (FMMS) has been updated in response to Item 12 (Commercial Fisheries) of the Applicant's further information request (FIR) received from An Coimisiún Pleanála (the Commission) on 1st August 2025. This version of the FMMS (Rev 01) supersedes the previous revision (Rev 00) that was included with the CWP Project planning application.

Explanatory notes provided within this document highlight where new and / or revised information has been provided. The explanatory notes also refer back to Commission's FIR to confirm how new and / or revised information relates to the requests made.

In summary, the updates within this version of the FMMS are limited to the following sections:

- Section 1.3 Legislation and Guidance
- Section 2.5 Cable burial
- Section 2.7 Whelk, lobster and crab fishery-specific measures
- Section 3 Fisheries Fund and Charter
- Section 4 Approach to mitigating cumulative effects

All other sections of the FMMS remain unchanged.

The Applicant notes that cross references within this document to the EIAR and other relevant planning application documents remain relevant and unchanged but should be considered alongside the supporting **EIAR Addendum** and other relevant documents prepared in response to the Commission's FIR.

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Abbreviations

Abbreviation	Term in Full
AEZ	Archaeological exclusion zone
CPUE	Catch per unit effort
CWP	Codling Wind Park
CWPL	Codling Wind Park Limited
EDF R	Électricité De France Renewables
EIA	Environmental Impact Assessment
FIR	Fishing Industry Representative
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables
FMMS	Fisheries Management and Mitigation Strategy
FOS	Fred. Olsen Seawind
GDPR	General Data Protection Regulation
IAC	Inter-array cables
MSO	Marine Survey Office
NMPF	National Marine Planning Framework
NSP	Navigational Safety Plan
NtM	Notice to Mariners
OECC	Offshore export cable corridor
OFLO	Offshore Fisheries Liaison Officer
OfTI	Offshore transmission infrastructure
O&M	Operations and maintenance
ORE	Offshore renewable energy
OSS	Offshore substation structure
OTI	Onshore transmission infrastructure
SAR	Search and rescue
SFPA	Sea-Fisheries Protection Authority
OWF	Offshore wind farm
WTG	Wind turbine generator
VMS	Vessel monitoring system

Definitions

Glossary	Meaning
array site	The red line boundary area within which the wind turbine generators (WTGs), inter-array cables (IACs) and the offshore substation structures (OSSs) are proposed.
Codling Wind Park (CWP) Project	The proposed development as a whole is referred to as the Codling Wind Park (CWP) Project, comprising of the offshore infrastructure, the onshore infrastructure and any associated temporary works.
Codling Wind Park Limited (CWPL)	A joint venture between Fred. Olsen Seawind (FOS) and Électricité de France Renewables (EDF R), established to develop the CWP Project.
The Developer	The Developer, Codling Wind Park Limited (CWPL).
Environmental Impact Assessment (EIA)	A systematic means of assessing the likely significant effects of a proposed project, undertaken in accordance with the EIA Directive and the relevant Irish legislation.
Environmental Impact Assessment Report (EIAR)	The report prepared by the Developer to describe the findings of the EIA for the CWP Project.
Fisheries Liaison Officer (FLO)	Individual employed by a developer as the key fishing / fisheries contact.
Fishing Industry Representative (FIR)	Fisheries liaison role often appointed with advice from local fisheries stakeholders who provides a balanced fishing industry view and provides a single onshore contact point within the fishing community.
Fisheries Engagement Manager	Individual employed by CWP, representing CWP on fishing with the support of the FLO and FIR.
guard vessel	Vessels used to provide protection to and from vulnerable project structures, exposed cables, etc.
landfall	The point at which the offshore export cables are brought onshore and connected to the onshore export cables via the transition joint bays (TJB). For the CWP Project, the landfall works include the installation of the offshore export cables within Dublin Bay out to approximately 4 km offshore, where water is too shallow for conventional cable lay vessels to operate.
offshore development area	The total footprint of the offshore infrastructure and associated temporary works including the array site and the OECC.
offshore export cable corridor (OECC)	The area between the array site and the landfall, within which the offshore export cables cable will be installed, along with cable protection and temporary works for construction.
Offshore Fisheries Liaison Officer (OFLO)	OFLOs will be on board survey and construction vessels as appropriate to act as the point of communication with fisheries stakeholders at sea.
offshore transmission infrastructure (OfTI)	The offshore transmission assets comprising the OSSs, interconnector cables and offshore export cables. The EIAR considers both permanent and temporary works associated with the OfTI.

onshore transmission infrastructure (OTI)	The onshore transmission assets comprising the TJBs, onshore export cables and the onshore substation. The EIAR considers both permanent and temporary works associated with the OTI.
static gear	Any form of fishing gear that operates without being towed or moved through the water (e.g. pots, long lines, set nets, traps).
vessel monitoring system (VMS)	A form of satellite tracking system using transmitters on board fishing vessels.

1 INTRODUCTION

1.1 The CWP Project

1. Codling Wind Park Limited (hereafter 'the Developer') is proposing to develop the Codling Wind Park (CWP) Project, which is located in the Irish sea approximately 13–22 km off the east coast of Ireland, at County Wicklow.

2. The Developer is applying for permission for all components of the CWP Project under Section 291 of the Planning and Development Act 2000, as amended (PDA) (as inserted by the Maritime Area Planning (MAP) Act 2021). This includes:

   - The generating station, located approximately 13–22 km off the coast of County Wicklow, which comprises: 60 or 75 wind turbine generators (WTGs) with an output of up to 1,300 megawatts (MW) and inter-array cables (IACs) and interconnector cables linking the WTGs and offshore substation structures (OSSs);
   - The Offshore Transmission Infrastructure (OfTI) which comprises three OSSs and three offshore export cables transporting the energy produced by the WTGs from the OSSs to land at the Poolbeg Peninsula;
   - The landfall on the southern Poolbeg Peninsula, which describes the point at which the offshore export cables are brought onshore and connected at three transition joint bays (TJBs) to the onshore export cables; and
   - The Onshore Transmission Infrastructure (OTI) on the Poolbeg Peninsula, which comprises the onshore export cables, the onshore substation and associated infrastructure and network cables to a planned extension to the existing ESB Networks 220 kV substation.

3. A detailed description of the CWP Project is provided in the Environmental Impact Assessment Report (EIAR) **Volume 2**, **Chapter 4 Project Description**.

1.2 Purpose of the Fisheries Management and Mitigation Strategy

4. This document should be read in conjunction with **Volume 3**, **Chapter 12 Commercial Fisheries** of the Environmental Impact Assessment Report (EIAR) for the Codling Wind Park (CWP) Project.

5. This Fisheries Management and Mitigation Strategy (FMMS) provides an overview of Codling Wind Park Limited's (CWPL) approach to fisheries liaison and mitigation, with regard to the CWP Project. This includes measures proposed to be implemented to facilitate co-existence with the commercial fishing industry, with the aim of minimising potential impacts to fisheries stakeholders as far as possible.

6. A detailed FMMS will be developed once future surveys and construction details become better defined post consent.

6°15'0"W 6°10'0"W 6°5'0"W 6°0'0"W 5°55'0"W 5°50'0"W 5°45'0"W 5°40'0"W 5°35'0"W

53°20'0"N 53°15'0"N 53°10'0"N 53°5'0"N 53°0'0"N

HARBOUR/MARINA	VHF RADIO CHANNELS	AREA DIALLING CODE	TELEPHONE NUMBER	WEB ADDRESS
Malahide Marina	37 & 80	+353(1)845	4129	www.malahidemarina.net
Howth Marina	37 & 80	+353(1)839	2777	www.hyc.ie
Poolbeg Marina		+353(0)1668	9983	www.poolbegmarina.ie
Dun Laoghaire Marina	37 & 80	+353(1)202	0040	www.dlrmarina.com
Greystones Harbour Marina	37	+353(1)287	3131	www.greystonesharbourmarina.ie
Arklow Marina	12	+353(0)402	39901	

IRELAND — EAST COAST

ARKLOW TO THE SKERRIES ISLANDS

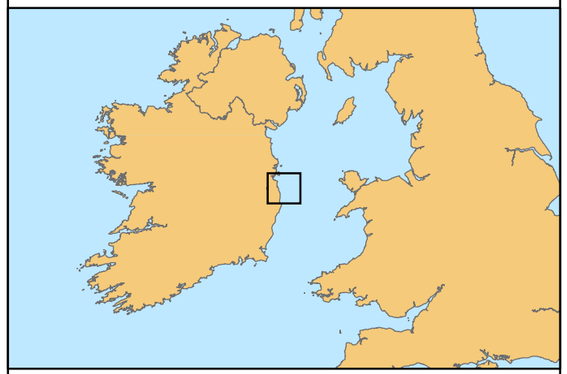
DEPTHS IN METRES

SCALE 1: 100 000 at lat 53°30′

Depths are in metres and are reduced to Chart Datum, which is approximately the level of Lowest Astronomical Tide.
Heights are in metres. Underlined figures are drying heights above Chart Datum. All other heights are above Mean High Water Springs.
Positions are referred to the WGS84 compatible datum, European Terrestrial Reference System 1989 Datum.
Navigational marks: IALA Maritime Buoyage System – Region A (Red to port).
Projection: Mercator.
Sources: The origin, scale, date and limits of the hydrographic

Legend

Planning Application Boundary



0 3 6 12 Kilometers

0 1.5 3 6 Nautical Miles

N

Scale: **1:275,000 @ A3**

Geodetic Parametres: **WGS 1984 World Mercator**

Produced: SF	Reviewed: CF	Approved: CF
Date: 13/08/2024	Rev: 01	Desc: Internal Use

Ref: **EDF-CWP-01-DEV-003-FMMS_ProjectBoundary**

Client: **CWPL**

Title:

Codling Wind Park Offshore Development Area
Planning Application Boundary

Brown & May Marine Ltd.

Document Path: **Z:\Projects\EDF_CodlingWindPark\MXDs\01-Development\EDF-CWP-01-DEV-003-FMMS_ProjectBoundary.mxd**

1.3 Legislation and guidance

Section 1.3 is unchanged except for paragraph 7 and the associated bullet points which have been added to ensure all relevant guidance is documented and up to date.

7. The FMMS will be guided by relevant policy set out in the National Marine Planning Framework (NMPF) and other available good practice guidance, including:

- 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.

8. The CWP Project will engage in active participation in the Seafood Offshore Renewable Energy (ORE) Working Group and involvement in the drafting of best practice guidelines will be pursued proactively.

9. Fisheries policies outlined in the NMPF and how they will be addressed by CWP Project are outlined in the **Planning Report** and have been summarised below.

Table 1-1 Summary of NMPF policies relevant to commercial fisheries

NMPF policy	Where addressed
Fisheries Policy 1: Proposals that may have significant adverse impacts on access for existing fishing activities must demonstrate that they will, in order of preference: a) avoid; b) minimise; or c) mitigate such impacts. d) If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.	Addressed in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**. In summary, there are no significant adverse impacts anticipated at a fleet level, as a result of avoidance of the highest intensity areas and appropriate mitigation.
Fisheries Policy 2: Where significant impact upon fishing activity arising from any proposal is identified, a FMMS should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and	While there are no residual significant (fleet-level) impacts predicted in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**, some short-term significant impacts were identified during construction that require additional mitigation. Therefore, CWP Project

NMPF policy	Where addressed
other interests, as appropriate. All efforts should be made to match the FMMS with those interests. Those interests should also undertake to engage with the proposer and provide best available, transparent and accurate information and data in a timely manner to help complete the FMMS. The FMMS should be drawn up as part of readying a proposal prior to submission, with measures identified to be considered in finalising conditions of any authorisations granted. Development of the strategy should be coordinated with other relevant assessments such as EIA where possible. The content of the FMMS should be relevant to the particular circumstances and could include: • An assessment of the potential impact of all stages of the development or other suggested use on the affected fishery or fisheries, both in socioeconomic terms and in relation to environmental sustainability. This assessment should include consideration of any impact upon cultural identity within fishing communities, as well as identifying indirect / in-combination matters. • A recognition that the disruption to existing fishing opportunities / activity should be minimised as far as possible. • Demonstration of the public benefit(s) that outweigh the significant impacts identified. • Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity. • Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socioeconomic impacts. Where it does not prove possible to agree the FMMS with all interests: • Divergent views and the reasons for any divergence of views between the parties should be fully explained in the FMMS, and dissenting views should be given a platform within the FMMS to make their case. • Where divergent views are identified, relevant public authorities should be engaged to identify informal and formal steps designed to enable proposal(s) to progress.	has chosen to bring forward and implement a FMMS thereby reducing residual impact. Assessment of potential impacts of all stages of the development is addressed in EIAR**, Volume 3**, **Chapter 12 Commercial Fisheries.** The cultural value associated with the marine environment, including fisheries, is considered in the ecosystem services assessment (see **Appendix A** of the **Planning Report**). This includes consideration of inter alia cultural ecosystem services refer to the psychical, psychological and spiritual benefits that humans obtain from contact with nature, and provisioning services derived from the direct connection between the ecosystem and provisioning services including fisheries and aquaculture. **Section 2** of this FMMS recognises the disruption to fishing activity should be minimised as far as possible and outlines the mitigation measures to achieve this. EIAR **Volume 3, Chapter 2 Policy and Legislation** outlines the public benefits of the proposed development. Section 2 of this FMMS outlines embedded mitigation identified in EIAR **Volume 3, Chapter 12 Commercial Fisheries**; therefore, the Developer considers the public benefit of the CWP Project to outweigh the significant impacts identified. Impacts and mitigation measures associated with the sustainability of fisheries are assessed in EIAR **Volume 3, Chapter 9 Fish, Shellfish and Turtle Ecology**. All contents of the FMMS have been consulted on with the fisheries stakeholders. They were also invited to comment on the document through the planning process. Industry feedback will inform the development of the post-consent FMMS, which will be based on policies and stakeholder feedback relevant at that time.

NMPF policy	Where addressed
Fisheries Policy 3: Proposals that enhance the sustainability of fisheries or support a sustainable fishing industry, including the industry's diversification and/or enhanced resilience to the effects of climate change, should be supported, provided they fully meet the environmental safeguards contained within authorisation processes.	Impacts associated with the sustainability of fisheries are assessed in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries.** CWP Project has developed a Sustainable Fishers Charter and has committed to a Fisheries Fund (see **Section 3**).
Fisheries Policy 4: Infrastructural proposals that enable access to fishing activities should be supported, provided they fully meet the environmental safeguards contained within authorisation processes.	Impacts associated with the sustainability of fisheries are assessed in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**. The document outlines the impacts during operations and maintenance (O&M), including detail on array layout and cable burial, and confirmation that fishing will not be excluded from the CWP Project offshore development area. Primary mitigation measures relevant to the assessment of commercial fisheries are set out in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**.
Fisheries Policy 5: Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, should be supported. If proposals cannot enhance essential fish habitat, they must demonstrate that they will, in order of preference: a) avoid; b) minimise; or c) mitigate significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration routes. d) If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding.	Impacts associated with fish habitat are assessed in EIAR **Volume 3 Chapter 9 Fish, Shellfish and Turtles Ecology**. While no significant impacts have been identified, CWP Project is undertaking feasibility studies for nature inclusive design (Fisheries Policy 3 to enhance fish habitat) within the voluntary biodiversity strategy for the project.
Fisheries Policy 6: Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to discuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.	Impacts and mitigation associated with fishing fleets are assessed in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**. While CWP Project is not a port and harbour project, with a view of avoiding commercial harm, in-depth consultation with ports and harbours has been considered in the existing baseline information. An overview of consultation undertaken is outlined in EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**.

NMPF policy	Where addressed
Co-existence Policy 1: Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference: a) minimise significant adverse impacts; b) mitigate significant adverse impacts; or c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	This FMMS outlines potential opportunities for co-existence and co-operation, as well as mitigation measures for any significant adverse impacts. Further to this, as presented within EIAR **Volume 3, Chapter 12 Commercial Fisheries**, a number of measures have been adopted to facilitate co-existence, including the project WTG layout options being developed to avoid or minimise interaction with known areas of high fishing density, where possible. As avoidance is not always possible, the layouts have also been developed to increase the potential for co-existence.

10. The Developer is aware of the *Submission from Representative Organisations of Ireland's Seafood Industry* to the Minister for the Environment, Climate and Communications (South Coast DMAP, 2023). The key points raised in this document are addressed in the EIAR **Volume 3**, **Chapter 12 Commercial Fisheries**.

11. In addition, feedback gained from direct consultation with fisheries organisations, individual fishermen and other relevant commercial fisheries stakeholders have informed the EIAR chapter and this FMMS. Engagement with fishermen and relevant fisheries stakeholders will be ongoing throughout the lifetime of the project.

1.4 Fisheries overview

12. As described in EIAR **Volume 3, Chapter 12 Commercial Fisheries,** commercial fisheries of most relevance to the CWP Project include the following:

- Potting for crab and lobster in the offshore export cable corridor (OECC); and
- Potting for whelk in the array site and OECC.

13. While operating in the vicinity, the following fisheries do not overlap with the offshore development area, or any overlap is negligible with no significant impacts:

- Dredging for razor clams and seed mussels in the offshore development area; and
- European (including Irish vessels) demersal trawling.

1.5 Fisheries liaison strategy

1.5.1 Communication and information transfer

14. The effective implementation of a suitable strategy for communication and information transfer is crucial to minimise interference and ensure successful co-existence with the fishing industry during surveys, and the construction, operation and decommissioning of the CWP Project.

15. The following sections outline the key roles and responsibilities related to liaising with the fishing industry and provide an overview of the Developers communication and information distribution strategy.

1.5.2 Roles and responsibilities

The Developer

16. The primary responsibilities of the Developer include the following:

- Maintaining a comprehensive and up-to-date list of stakeholders, as it is fundamental for effective engagement and information exchange.
- Aiming to engage with fishermen regularly in order to build relationships and establish trust, as well as use current industry best practices to plan, construct, operate and decommission the CWP Project, while ensuring co-existence with fishing activities.
- Establishing effective liaison procedures between the Developer and the fishing industry. This FMMS includes detailed information about the proposed fisheries liaison roles, clearly defining their responsibilities regarding CWP Project and their contact details.
- Appointing a Fisheries Liaison Officer (FLO), Offshore Fisheries Liaison Officers (OFLO), where required, and a Fishing Industry Representative (FIR), acknowledging that utilising local fishermen's expertise in fishing practices and vessels can reduce interactions between fishing activities and the works associated with the CWP Project.
- Promoting productive co-existence through the measures outlined in the FMMS.
- Continuing to consider the concerns of commercial fisheries stakeholders while planning mitigation strategies.

Fisheries Liaison Officer (FLO)

17. It should be noted that a FLO has been appointed to the project since 2021 and will be retained throughout the various stages of CWP Project's lifecycle.

18. The principal role of the FLO is to establish and maintain effective communications between the Developer, any contractors or sub-contractors, fishermen and other users of the sea during surveys and the construction and operation of CWP Project and to monitor compliance with good practice guidelines while doing so.

19. The primary responsibilities of the FLO are as follows:

- Outline to stakeholders the FLO role, including authority, responsibilities and FLO relationship with the ORE projects, demonstrating good faith during all the interactions with stakeholders and ensuring that no unwarranted expectations are generated.
- Identify individual commercial fishing vessels and skippers operating in areas relevant to CWP Project and gather information on the fishing activities that take place within and around CWP Project.
- Establishing and maintaining a strong working relationship with the fishing industry.
- Identifying potential interactions between the CWP Project and fishing operations.
- Acting as the main point of contact for fisheries stakeholders and recognising this is beyond the hours of 9 am to 5 pm.
- Communicating clearly and accurately with the fishing industry, as well as organising meetings and maintaining regular liaison with local fisheries stakeholders.
- Maintaining a fisheries stakeholder database, including vessel descriptions, information on fishing methods deployed, skippers' concerns and contact details.

- Preparing and distributing information and notices in timely fashion with regard to CWP Project and related activities that could potentially interact with fisheries stakeholders.
- Communicating to CWP Project relevant fishermen's concerns and sensitivities in respect of the various activities associated with CWP Project.
- Following GDPR procedures and protect the data and privacy of contacts.

Fishing Industry Representative (FIR)

20. In addition to FLOs, the CWP Project has appointed a dedicated FIR. The FIR must be able to demonstrate that they have knowledge of the fishing community and contacts within the local industry. Their responsibilities include:

- Being an independent conduit for information exchange between the CWP Project and the fishing industry.
- Informing the Fisheries Engagement Manager of the local fishing activity and the potential impacts of the CWP Project on the fishing community.
- Identifying and proactively engaging with commercial fisheries stakeholders that have the potential to be affected by the CWP Project.
- Formulating, agreeing and implementing efficient communication channels for distributing project related information to stakeholders.
- Disseminating information from the Developer to the fishing industry and vice versa, in a prompt and all-inclusive manner.
- Continuing to give consideration to the concerns of commercial fisheries stakeholders in the formulation of mitigation strategies.
- Promoting productive co-existence through the early provision of information to fisheries stakeholders.
- Maintaining a fisheries stakeholder database to ensure all fisheries stakeholders are adequately informed of the CWP Project activities.
- Maintaining a communications log to keep a record of all engagement with fisheries stakeholders, including both onshore and offshore communications.

Offshore Fisheries Liaison Officer (OFLO)

21. OFLOs will be on board the principal survey and construction vessels as appropriate to facilitate communication with fisheries stakeholders at sea and to address any issues as soon as possible to minimise potential for conflict between CWP Project and fishing activities.

22. The primary responsibilities of OFLOs include:

- Maintaining regular contact with the FLO, the Developer, and / or their contractors regarding fishing vessel activity around the CWP Project.
- Educating the other crew onboard survey and construction vessels about fishing vessels operating in their working areas, as well as their fishing gears and modes of operation, and highlighting methods of working to minimise interactions.
- Communicating with offshore fishing vessels, providing information such as project-related vessel locations, operations, schedule of works and advisory safety zones.
- Liaising with fishermen who may have deployed static gear in and around the CWP Project, especially around advisory safety zones and vessel transit routes.
- Ensuring adherence with relevant aspects of the FMMS, in coordination with the vessel master.
- Recording details of any fishing activity in and around the CWP Project (including fishing vessels, gear and communications with fishermen) and of any infringement of, movement of or damage to fishing gear.

- Providing daily update reports via email to the FLO and Developer.

Information distribution

23. Under the principles set out in the draft ORE seafood guidance document, the CWP Project agrees that '*through meaningful engagement between the sectors on the basis that both the Seafood and ORE industries can co-exist in the long term. Mutual respect, best endeavours to reach agreement, and recognition of the importance of both sectors, is critical to effective engagement*', and will follow the principles outlined in the guidance:

- *'Early and ongoing engagement*
- *Communication: Commit to open sharing of information by both ORE and seafood industries, that is relevant to the intended recipient and, subject to commercial / GDPR or other restrictions, communicate with each other honestly, openly and transparently. All data / information will be evidence-based and provided in a way that is easily understood and accessible.*
- *Cooperation: Work together, recognising each other's expertise and the importance of each other's industry to Ireland, to our economy, our society, and our coastal communities, to achieve sustainable outcomes that benefit us all.*
- *Co-existence: Encourage the principle that the seafood and offshore renewable energy industries can work side-by-side and co-exist in a manner that respectfully shares the marine space.*
- *Cooperate to determine the impact, effect and opportunities that ORE proposals may have on seafood activity and work together to avoid, minimise or mitigate any negative impacts'*

24. Disseminating appropriate and accurate information to all parties as early as possible, and ensuring that effective lines of communication in relation to the CWP Project are maintained, is key to fostering an ongoing productive working relationship with fisheries stakeholders.

25. Appropriate communications will continue with fisheries stakeholders to ensure they are kept informed of offshore activities throughout surveys and the construction, O&M and decommissioning phases. Key communications include:

- Consultation, project updates and regular liaison with fisheries stakeholders through port visits, face-to-face meetings, emails, letters and phone calls with the Developer, FLO and FIR;
- Circulating Marine Notices and other navigational warnings as early as possible to inform stakeholders of the position, nature and timing of any works, and if there are advisory safety zones or advisory clearance distances around the works; and
- Keeping the Marine Survey Office (MSO) informed of progress and the completion of the CWP Project, including the location of project infrastructure.

26. A proposed schedule of information distribution to fisheries stakeholders during surveys and the lifespan of the project are given in **Table 1-2**.

Table 1-2 Information distribution proposed timelines

Activity	Timing
Site surveys	Notice and information distribution not less than 30 days prior to survey mobilisation (where feasible) in line with MSO guidelines.
Construction activities	Notice and information distribution as early as reasonably practicable prior to commencement of offshore construction activities. For individual construction vessels, notice and information will be aimed to be provided not less than two weeks prior to vessel mobilisation (where feasible). Notices will be updated and issued at weekly intervals during construction activities in the form of a Weekly Notice of Operations.

Activity	Timing
Consultation meetings	Consultation meetings as required throughout the project's life cycle.
Unscheduled liaison	Additional unscheduled liaison and consultation will be undertaken by either the FLO or the FIR as required.

2 FISHERIES MITIGATION AND MANAGEMENT MEASURES FOR CO-EXISTENCE

27. As highlighted in the National Marine Planning Framework (NMPF), co-existence between offshore wind and fisheries should be prioritised. The Developer is committed to promoting co-existence between the CWP Project and fishing activities. An approach to avoiding and reducing impacts to both the commercial fishing and offshore wind farm industries is considered the most sustainable approach to achieve this.

28. Primary mitigation measures relevant to the assessment of commercial fisheries are outlined in **EIAR Volume 3, Chapter 12 Commercial Fisheries** and are summarised in **Table 2-1.** Additional mitigation includes measures that are not incorporated into the design of the CWP Project and require further activity to secure the required outcome of avoiding or reducing impact significance. Additional mitigation measures proposed by the Developer are outlined in this section.

Table 2-1 Primary mitigation measures

Project element	Description
Construction Environmental Management Plan (CEMP)	A **CEMP** has been prepared to provide a management framework, to ensure appropriate controls are in place to manage environmental risks associated with the construction of the CWP Project. It outlines environmental procedures that require consideration throughout the construction process, in accordance with legislative requirements and industry best practice. In summary, the CEMP includes details of: • The Environmental Management Framework for the CWP Project, including environmental roles and responsibilities (e.g. ecological clerk of works) and contractor requirements (e.g. method statements for specific construction activities); • Mitigation measures and commitments made within the EIAR, Natura Impact Statement (NIS) and supporting documentation for the CWP Project; • Measures proposed to ensure effective handling of chemicals, oils and fuels, including compliance with the MARPOL convention; • A marine pollution prevention and contingency plan to address the procedures to be followed in the event of a marine pollution incident originating from the operations of the CWP Project; • An emergency response plan to be adhered to in the event of discovering unexploded ordnance; • Offshore biosecurity and invasive species management plan, detailing how the risk of introduction and spread of invasive non-native species will be minimised; and • Offshore waste management and disposal arrangements. The **CEMP** will be implemented by the Developer and its appointed contractor(s) and will be secured through conditions of the development consent. It will be a live document which will be updated and submitted to the relevant authority prior to the start of construction.

Project element	Description
The array layout has been developed to ensure the impacts on commercial fisheries are minimised and to maximise the potential for co-existence	Positions of WTGs and OSSs have been informed by a wide range of site-specific data, including metocean data (e.g. wind speed and direction), geophysical and geotechnical survey data (e.g. bathymetry), environmental data (e.g. benthic surveys and archaeological assessment) and stakeholder consultation. Designing and optimising the layout of the WTGs has considered multiple constraints identified from analysing these datasets, alongside the consideration of layout principles taken from relevant guidance on the design of OWFs. A summary of the key actions taken to avoid or otherwise reduce impacts is provided below: • The WTG layout options include search and rescue (SAR) access lanes to allow a SAR resource to fly on the same orientation continuously through the array site. This is provided to minimise risks to surface vessels and/or SAR resource transiting through the array site. • Archaeological exclusion zones (AEZs) around known features of archaeological interest have been avoided. No works that impact the seabed will be undertaken within the extent of an AEZ during the construction, operational or decommissioning phases. • The locations of offshore infrastructure been developed to avoid known sensitive ecological habitats, including areas with suitable conditions for *Sabellaria spinulosa*, which can form reefs under some circumstances. While reefs were not identified during the characterisation surveys, as an ephemeral feature it will be necessary to validate the results in advance of construction. A pre-construction geophysical survey will therefore be undertaken to facilitate the micrositing around sensitive habitats such as *Sabellaria spinulosa*. • The WTG layout options have been developed to avoid or minimise interaction with known areas of high fishing density, where possible. As avoidance is not always possible, the layouts have also been developed to increase the potential for co-existence. • A paleochannel (the remnants of a river or stream channel that flowed in the past) in the centre west of the array site has been avoided.
Navigational Safety Plan (NSP)	A NSP has been prepared for shipping and navigation purposes, including the safe navigation of fishing vessels. The NSP includes details of: • Advisory safe passing distances around structures and works; • Marine coordination and communication to manage the movements of project vessels; • Marking of all infrastructure associated with the project (including subsea cables) on appropriately scaled Admiralty Charts; • Procedures in relation to Local Notices to Mariners, to be updated and reissued during construction and prior to planned maintenance works; • Consultation with the relevant harbour authorities;

Project element	Description
	• Compliance of all project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) and International Convention for the Safety of Life at Sea (SOLAS); and • Use of a guard vessel(s) as deemed appropriate by risk assessment. The NSP will be implemented by the Developer and its appointed contractor(s) and will be secured through conditions of the development consent. It will be a live document which will be updated and submitted to the relevant authority prior to the start of construction.
Burial of cables	The Developer will, where practicable, bury all cables within the offshore development area: • IACs and interconnector cables will have a minimum depth of cover of 1.0 m; and • Offshore export cables will have a minimum depth of cover of 1.4 m. In cases where burial is inadequate due to unforeseeable seabed conditions, and at cable crossings, cable protection will be implemented as mitigation to avoid risks to other marine operations.
Production of a **Fisheries Management and Mitigation Strategy** (this document)	A Fisheries Management and Mitigation Strategy (FMMS) has been prepared to provide an overview of the Developer's approach to fisheries liaison and mitigation with regards to the CWP Project. This includes measures proposed to facilitate co-existence with the commercial fishing industry with the aim of minimising potential impacts to fisheries stakeholders as far as possible. The FMMS includes details of: • The roles and responsibilities of the FLO and other relevant fisheries liaison roles; • Approach to disseminating information and communicating with fisheries stakeholders; • Procedures to facilitate co-existence; and • The code of good practice for all vessels. The FMMS will be implemented by the Developer and its appointed contractor(s) and will be secured through conditions of the development consent. It will be a live document which will be updated prior to the start of construction to reflect the most up-to-date policy and legislation on co-existence.

2.1 Survey planning

29. The CWP Project will investigate whether it is possible to apply a flexible approach to surveys whereby complete clearance is not requested but rather phased, shorter-term clearance as surveys progress.

If full clearance is required, the CWP Project will consider fishing activity density, supported by regular scout surveys, aiming to minimise disruption during the peak fishing season.

30. The Developer will work with other developers and State agencies in the vicinity to co-ordinate surveys to minimise the overall cumulative impact.

2.2 Guard vessels

31. During site investigation and construction operations, guard vessels will be contracted to assist, aiming to reduce the risk of fishing gear interference. It is anticipated that the provision of guard vessels will be the responsibility of the Developer's contractors during construction activities, as appropriate.

32. The pilot and guard vessels will support the OFLO in monitoring fishing activity and communicating with fishing vessels charter.

2.3 Code of good practice for all vessels

33. Contractors appointed by the Developer will be required to follow a code of good practice to ensure external communication is accurate and to aid co-existence with the fishing industry. It is anticipated that the code of good practice will include the following:

- Ensure that all vessels under contract for the CWP Project adhere to COLREGs and SOLAS requirements;
- Ensure that any accidently dropped project-related debris is removed as practicably and safely as possible and reported to fisheries stakeholders, as appropriate;
- Where appropriate, suitably qualified and certified OFLOs will be on board certain survey and construction vessels;
- All vessels under contract with the CWP Project will maintain professional communications with fishing vessels during offshore operations, ideally only through an OFLO, if available;
- All vessels under contract with the CWP Project will constantly monitor the required very high frequency (VHF) channels for receiving communications from fishing vessels; and
- All vessels contracted to undertake work for the CWP Project will have undertaken appropriate risk assessments in respect of potential interactions with commercial fishing vessels and their gear.

2.4 Reporting of dropped objects

34. A dropped objects at sea procedure, to be followed if any objects are dropped at sea, will be produced for the CWP Project in the interest of ensuring safety and minimising risks to fishing. The procedure will include necessary reporting requirements.

2.5 Cable burial

Section 2.5 is unchanged except for paragraph 35 which is replaced by paragraph 35 below. This update has been made in response to FIR Item 18a (see **FIR Response Document**).

35. The Developer will, where practicable, bury all IACs and interconnector cables to a minimum depth of cover of 1 m. Likewise, the Developer will bury all offshore export cables within the OECC to a

minimum depth of cover of 1.4 m (except cables buried within the zone of greater burial depth adjacent to Dún Laoghaire (DL) Harbour, which will have a minimum depth of cover of 3.0 m).

36. This will provide the cables with protection against damage and reduce interference with fishing activities and other sea users. Apart from in the zone of greater burial depth, where following cable burial, the minimum depth of cover is inadequate due to unforeseeable seabed conditions, cable protection will be implemented as mitigation to avoid risks to other marine operations.

37. Secondary cable protection within the array site and OECC (except in the zone of greater burial depth) will be achieved by covering the exposed cables with rock placement. This ensures cables remain protected from natural movements of the seabed and from anthropogenic factors that may cause damage to a cable (e.g. trawling or anchors). In addition to rock placement, cable protection within the OECC will be required at cable crossing locations using concrete mattresses.

38. A preliminary cable burial risk assessment, taking into consideration the location of cable crossings, has been undertaken to identify locations that may require cable protection. This exercise has determined an anticipated extent and volume of cable protection within the array site and OECC, which has been used as a basis for the EIA.

39. It should be noted that cable burial is the preferred method of protection, and secondary cable protection will only be used where cable burial is not appropriate or achievable. Where required, the location and type of cable protection used will be communicated to the fishing industry.

2.6 Procedures in relation to gear fastening or loss

40. The following procedure replicates that which has been in place in respect of the UK offshore oil and gas industry and describes the steps that should be undertaken in the event of fishing gear becoming fastened within the proposed CWP Project areas:

- If the fastened gear is not easily retrieved, fishermen should not apply excessive winch, line or net hauler loads or engine powers in attempts to retrieve fastened gear;
- The fishing vessel should advise the coastguard, giving an accurate position of the vessel and/or lost gear;
- If the coastguard confirms that the vessel is in the immediate vicinity of a cable or wind farm-related infrastructure, serious consideration will be given to the slipping of the gear and buoying and recording its position;
- After buoying off the gear, its position should be confirmed with the coastguard and the FLO;
- On returning to port, the local Fishery Office should be contacted and the incident registered in the normal manner;
- A gear loss form should be completed and forwarded to the FLO; and
- On no account should skippers grapple in an attempt to recover fishing gear lost or cut away in the vicinity of the inter-array or export cables.

2.7 Whelk, lobster and crab fishery-specific measures

Section 2.7 is unchanged except for paragraph 41 which is replaced by paragraph 41 below. This update has been made in response to FIR Item 12b (see **FIR Response Document**).

2.7.1 Co-operation agreements

41. It is the intention of the CWP Project to promote co-existence and minimise potential disruption to normal commercial fishing practices. It is recognised, however, that there may be instances where the relocation of static fishing gear may be necessary as a result of survey or construction works. Where this is the case, the Developer will endeavour to enter into reasonable, justifiable and evidence-based co-operation agreements with affected fishermen at an individual level who can demonstrate a legitimate economic dependency on the CWP Project offshore development area wherever possible. If a mutually agreed settlement is not reached, then both parties should seek to review and follow the Seafood/ORE Working Group Dispute Resolution Mechanism Guidance, the core principles of which are: voluntary participation; confidential process (with limited exceptions under the Mediation Act 2017); enforceable outcomes (unless parties agree otherwise); the mediator must remain neutral; parties retain self-determination; and mediation follows the Mediation Act 2017 and the Mediators' Institute of Ireland Code of Ethics. All parties must commit to all guidance in the Seafood/ORE Guidance Library and make a demonstrable effort to resolve issues directly first.

42. The CWP Project will follow standard procedures as outlined in the (draft) *Seafood ORE Co-existence Best Practice Guidelines*, or relevant guidelines and legislation in place at that time. This FMMS will be updated once the ORE co-existence BPG is finalised, post consent.

43. It is proposed that vessel interactions will be managed by means such as COLREGs and phasing of construction.

2.7.2 Fisheries monitoring

44. As outlined in EIAR **Volume 3, Chapter 12 Commercial Fisheries**, the Developer will monitor pre- and post-construction fishing activity in the proposed development. Pre- and post-construction monitoring of fisheries activity is anticipated to include:

    a. Undertaking a review of fisheries data from Sea-Fisheries Protection Authority (SFPA) for period of five years and;

    b. Undertaking a dedicated pre- and post-construction monitoring programme to determine changes in catch per unit effort (CPUE) of whelk within the array.

45. The aim of the commercial fisheries monitoring is to provide an accurate representation of fishing activity and CPUE in areas of relevance to the proposed development. The results of the monitoring may inform updates to the FMMS.

46. In addition, pre- and post-survey observation trips have been offered to fishermen, targeting the CWP Project to further facilitate co-existence opportunities.

3 FISHERIES FUND AND CHARTER

Section 3 is replaced in its entirety by the text below. This revision has been made to highlight commitments published in the Codling Wind Park Sustainable Fishers Charter.

47. The CWP Project has established a dedicated €500,000 Fisheries Fund to benefit the fishing industry operating within and around the Codling Bank area of the Irish Sea. The fund provides an annual budget of €100,000 over five years (from 2023) to support different initiatives to promote the fishing industry and long-term sustainable fishing on the Codling Bank (CWP, 2023).

48. The Developer has also published the **Codling Wind Park Sustainable Fishers Charter** (available here), which sets out the project's commitments to responsible stewardship of the Codling Bank and to transparent, ongoing engagement with fishers and other stakeholders.

49. The Charter (CWP, 2023) includes commitments to:

- Continued provision of the Fisheries Fund across a five-year period;
- Open, transparent and honest engagement;
- Regular communications with fishers and stakeholders;
- Facilitation of experience-sharing (including visits to other locations) to explore and demonstrate opportunities for co-existence between fishing and offshore energy;
- Pre- and post-construction monitoring of whelk and other key species;
- Consideration of design options to support biodiversity; and
- Actively working to avoid or minimise impacts on people and the environment and to support biodiversity on the Codling Bank and wider ecosystem.

4 APPROACH TO MITIGATING CUMULATIVE EFFECTS

Section 4 has been added to the FMMS. This revision has been made in response to FIR Item 12 (see **FIR Response Document**).

50. The Developer, together with other Phase 1 Project developers, collectively acknowledge the importance of a cumulative approach across the Irish Sea. It is noted that construction-phase effects are being managed through project-level disruption protocols and that, as fishing is not prohibited within operational wind farms in Ireland, the Developer anticipates fishing activity will be able to resume within operational arrays and export cable corridors. This position is supported by international experience (notably from the UK) where fishing has resumed within operational wind farms subject to appropriate safety and navigation measures. However, recognising stakeholder concerns, the Developer, together with other Phase 1 Project developers, commit to a suite of actions intended to improve the evidence base, monitor outcomes, and respond if unanticipated cumulative displacement effects arise.

51. Recognising that Ireland does not yet have a dedicated, published national guidance document specifically addressing cumulative fisheries displacement associated with offshore renewables, and that the Seafood/ORE Working Group's co-existence and displacement guidance is currently under development, the Developer has drawn on established international good practice to inform the approach set out below. In particular, the ScotMER/Marine Scotland Science Good Practice Guidance for assessing fisheries displacement by other licensed marine activities (Xodus, 2022) provides a robust framework for defining displacement (including primary and secondary displacement), establishing appropriate fisheries baselines, and considering displacement within cumulative and in-combination assessments. The approach below applies these good-practice principles, adapted to the Irish regulatory and data context, to support transparent evidence gathering, monitoring and proportionate mitigation should cumulative displacement effects arise. Monitoring and mitigation will be carried out in line with the most up to date guidance in place at the time of construction.

1. Collaborative monitoring through iVMS deployment

52. The Phase 1 Developers propose to work in collaboration with the Marine Institute and the fishing industry to support the proactive implementation of inshore Vessel Monitoring Systems (iVMS) on selected fishing vessels operating in and around the development areas. This initiative will:

- Enable real-time and long-term monitoring of fishing patterns, both within the array areas and cable corridor areas, as well as in neighbouring grounds;
- Provide essential baseline data ahead of construction, against which future displacement or redistribution of fishing effort during construction and operation can be compared;
- Be implemented through voluntary participation, targeting a representative spread of vessel sizes and fishing methods, particularly those not currently mandated to carry VMS;
- The Marine Institute's existing scheme for the provision of free iVMS units will be utilised to support uptake, and the Developers will facilitate outreach and coordination through Company Fisheries Liaison Officers.

53. This is in line with the '*next steps'* outlined in the Seafood ORE Working Group's annual report.

2. Independent scientific oversight and research commitment

54. To ensure that monitoring and assessment of potential displacement impacts are carried out in a transparent and evidence-based manner, the Phase 1 Developers propose to collaborate with an

independent scientific body, such as the Marine Institute and/or an independent academic partner, to lead on the design, delivery, and interpretation of data collection and analysis. This partnership will help ensure neutrality and scientific credibility in the evaluation of fishing patterns and co-existence outcomes. As part of this commitment, the Developers will explore the feasibility of undertaking a research project (e.g., a funded doctoral studentship or independent scientific research programme) focused on investigating potential cumulative displacement effects of offshore renewable energy developments. The research will aim to improve the understanding of spatial interactions between fisheries and offshore infrastructure and provide a knowledge base for future policy development and mitigation strategies.

3. Cumulative and holistic consideration

55. The Developers acknowledge the need to address cumulative impacts arising from multiple offshore renewable energy developments in the Irish Sea and are committed to taking a holistic, collaborative approach. The Developer intends to continue to actively participate in cross-project coordination forums, including the Seafood /ORE Working Group and will seek to share data, align monitoring efforts, and contribute to broader understanding of displacement patterns. Furthermore, the Developer is open to exploring the development of shared mitigation mechanisms, subject to agreed frameworks and evidence of material impact.

4. Addressing cumulative impacts should they arise

56. In the event that cumulative displacement impacts are identified through the evidence base of iVMS, the Phase 1 Developers propose a two-tiered approach tailored to the short-term construction phase and the medium- to long-term operation and maintenance (O&M) phase.

4.1 Short-term: Construction phase impacts

57. Construction activities can cause temporary disruption to fishing operations, particularly within array areas and cable route corridors. If monitoring and engagement confirm that short-term displacement has occurred, this will be addressed at the project level through individually managed mechanisms. These would include:

- Disruption payments to compensate directly affected fishers for loss of access or additional costs incurred during construction;
- A clear, project-specific process for verification and claims, underpinned by vessel activity data (e.g. iVMS, logbook records) and validated with fisher engagement;
- Tailored mitigation measures, such as temporary coordination of access or scheduling works in consultation with the fishing industry to minimise peak conflict.

58. This project-by-project approach ensures timely and targeted mitigation of construction-related impacts without waiting for wider strategic processes.

4.2 Medium–long term: O&M phase impacts

59. For the O&M phase, the Developer is confident that co-existence will allow resumption of fishing within the array during the operational phase. Where evidence indicates that current fishing methods cannot be effectively or safely deployed within the operational site, the Developer will work collaboratively with affected fishers to explore practical solutions such as gear reconfiguration support, technical

adaptations, or cooperative initiatives to futureproof the fleet in alignment with the evolving offshore energy and marine spatial context.

60. If monitoring indicates evidence of cumulative displacement, the Developer is committed to considering suitable mitigation at that point in time. However, it is recognised that the scale and nature of any cumulative effects will depend on which offshore wind projects ultimately secure consent, and, if consented, their respective construction and operational timelines. Given this current uncertainty, the Developer cannot commit to detailed, collaborate cumulative mitigation measures at this stage. Instead, the Developer will keep the requirement for cumulative mitigation under review and, if monitoring and evidence demonstrate significant cumulative displacement, will work collaboratively to develop and implement proportionate measures at the appropriate time.

5 REFERENCES

61. Codling Wind Park (2023) Codling Wind Park Sustainable Fishers Charter. Available from: https://codlingwindpark.ie/wp-content/uploads/2023/04/Codling-Fishers-Charter_-2023_04_28-11am.pdf

62. Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) (2025). Best Practice Guidance for Fisheries Liaison with Offshore Renewables Developments. November 2025. Prepared by the FLOWW working group with support from ABPmer; published via The Crown Estate

63. Seafood / ORE Working Group (2023) Seafood / ORE Engagement in Ireland: A Summary Guide.

64. South Coast DMAP (2023) A Submission from Representative Organisations of Ireland's Seafood Industry.

65. Seafood / ORE Working Group (2024) Seafood / ORE working Group Dispute Resolution Mechanism (DRM)

66. Seafood / ORE Working Group (Undated) Use of Fishing Vessels for Commercial Work on ORE Projects: A Guide to Registration. Dublin: Government of Ireland

67. Xodus Group (2022). Good Practice Guidance for assessing fisheries displacement by other licensed marine activities (Report No. A303088-S00-REPT-002-A02). Report for Marine Scotland Science / Scottish Government

68. Xodus (2025). Monitoring Offshore Windfarm Impacts on the Commercial Fishing Industry: Good Practice Guidance. Report produced on behalf of the Scottish Government (ScotMER). Edinburgh: Scottish Government.