Cenos Offshore Windfarm Limited

Cenos EIA

Chapter 23 - Summary of Mitigation and Monitoring

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CONTENTS

ACRONYMS

ACRONYM	DEFINITION
ADD	Acoustic Deterrent Device
AEZ	Archaeological Exclusion Zones
AIS	Automatic Identification System
ANO	Air Navigation Order
BWM	Ballast Water Management
CAA	Civil Aviation Authority
CaP	Cable Plan
CAP	Civil Aviation Publication
CBRA	Cable Burial Risk Assessment
CES	Crown Estate Scotland
CLO	Community Liaison Officer
CMS	Construction Method Statement
COLREGs	International Regulations for the Prevention of Collision at Sea
DGC	Defence Geographic Centre
DoL	Depth of Lowering
DSLP	Development Specification and Layout Plan
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMF	Electromagnetic Field
EMP	Environmental Management Plan
EPS	European Protected Species
ERCoP	Emergency Response Cooperation Plan
ESG	Environmental, Social, and Governance
FLO	Fisheries Liaison Officer
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
FMMS	Fisheries Management and Mitigation Strategy
FTU	Floating Turbine Unit
GHG	Greenhouse Gas
HDD	Horizontal Directional Drilling
HSE	Health and Safety Executive
IAC	Inter-Array Cables

ACRONYM	DEFINITION
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IEMA	Institute of Environmental Management and Assessment
IMO	International Maritime Organization
INNS	Invasive Non Native Species
INNSMP	Invasive Non Native Species Management Plan
INTOG	Innovation and Targeted Oil & Gas
JNCC	Joint Nature Conservation Committee.
LMP	Lighting and Marking Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Mammal Observer
MoD	Ministry of Defence
MPCP	Marine Pollution Contingency Plan
NCMPA	Nature Conservation Marine Protected Area
NLB	Northern Lighthouse Board
NOTAM	Notice to Aviation
NtM	Notice to Mariners
NSP	Navigational Safety Plan
NSTA	North Sea Transition Authority
OFLO	Offshore Fisheries Liaison Officer
OMP	Operations and Maintenance Programme
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OPRED-ODU	Offshore Petroleum Regulator for Environment and Decommissioning - Offshore Decommissioning Unit
OSCP	Offshore Substation Converter Platform
OSPAR	Oslo-Paris Convention
OWF	Offshore Wind Farm
PAD	Protocol for Archaeological Discoveries
PAM	Passive Acoustic Monitoring

ACRONYM	DEFINITION
PWA	Pipeline Works Authorisations
ROV	Remotely Operated Vehicles
RYA	Royal Yachting Association
SAR	Search and Rescue
SCDS	Supply Chain Development Statement
SOLAS	International Regulations for the Safety of Life at Sea
SOPEP	Ship Oil Pollution Emergency Plan
SOV	Service Operations Vessel
TAEZ	Temporary Archaeological Exclusion Zones
TLP	Tension Leg Platform
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
VMP	Vessel Management Plan
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

22 SUMMARY OF MITIGATION AND MONITORING

This chapter of the Environmental Impact Assessment Report (EIAR) outlines the proposed mitigation and monitoring requirements for the Project. The mitigation has taken into account best practice from the Institute of Environmental Management and Assessment (IEMA) (IEMA, 2015) in which mitigation measures can be classified under the following categories (EIAR Vol. 2, Chapter 7: EIA Methodology):

1. Primary - measures that are an inherent part of the design of the Project which reduce or avoid the likelihood or magnitude of an adverse environmental effect, including location or design;
2. Secondary - additional mitigation measures implemented to further reduce environmental effects to 'not significant' levels (where appropriate) and do not form part of the fundamental design of the Project;
3. Tertiary - measures that are implemented in accordance with standard industry practice or to meet legislative requirements and are independent of the Environmental Impacts Assessment (EIA) (i.e., these mitigation measures would be implemented regardless of the findings of the EIA).

The chapter details the mitigation measures (Table 22-1) and proposed monitoring (Table 22-3) requirements below. A summary of the mitigation measures and where they apply to topic-specific chapters is provided in Table 22-2.

Outline management plans have been provided alongside the Application: EIAR Vol. 4, Appendix 32: Outline Environmental Management Plan, Appendix 33: Outline Marine Mammal Mitigation Protocol, and Appendix 34: Outline Fisheries Management and Mitigation Strategy. These documents will be updated post consent in consultation with stakeholders and submitted for approval prior to construction.

22.1 Mitigation Measures

Table 22-1 Mitigation measures

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-001	Use of Horizontal Directional Drilling (HDD) as the landfall cable installation option.	Primary	Landfall installation methodology (Horizontal Directional Drilling) will avoid direct impacts to the intertidal area.	Landfall installation methodology will be detailed within the Construction Method Statement (CMS), required under Section 36 Consent and/or Marine Licence conditions.
MM-002	Mooring and anchor design to ensure reduction of habitat loss and disturbance.	Primary	Floating Turbine Unit (FTU) mooring designs considered for the project have excluded the catenary mooring which was identified as the design with the largest seabed footprint, therefore minimising footprint within the East of Gannet and Montrose Fields Nature Conservation Marine Protected Area (NCMPA). Semi-taut and taut mooring designs options for semi-submersible substructure and tendon mooring designs for Tension Leg Platform (TLP) substructures have been retained as mooring design options for the Project because these design options produce the least disturbance and minimise potential for habitat loss. Additionally, anchor designs considered for the Project have excluded the drag embedment anchor, which was identified as the design with the greatest potential for seabed disturbance and habitat loss. Suction and driven pile anchor designs have been retained as anchor design options for the Project because they have the smallest footprint and minimise potential seabed disturbance during installation. Anchors will be installed through suction embedment or piling, rather than drilling, in order to minimise sediment disturbance. Novel anchor solutions with equivalent or similar seabed footprint have also been retained as options.	Commitment made within Project design. The final design will be detailed within the CMS, required under Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			Localised habitat loss during the installation phase is an unavoidable consequence of the Project. Best practices will be followed to ensure that potential habitat loss is reduced (e.g. micro-siting and reducing the benthic footprint of the Project), including during the operational phase (e.g. from mobile mooring chains on the seabed). The amount of rock armour, grout bags, and concrete mattresses used to protect the Export / Import Cable and the Inter-Array Cables (IACs) will be kept to a minimum where possible, especially in the NCMPAs.	
MM-003	Design of scour protection to minimise introduction of hard substrate.	Primary	Rock placement will not be used for scour protection because it maximises the introduction of hard substrate and is difficult to remove. Alternative scour protection methods are being considered (e.g. scour reduction strakes and tubular sleeves) which would not increase the maximum footprint of the piles. The mean surface sediment thickness across the entire site is less than 0.5 m indicating scour protection requirements are likely to be negligible or not required within the Project Area.	Final scour requirements will be informed by the scour assessment and detailed within the CMS, required under Section 36 Consent and/or Marine Licence conditions.
MM-004	Micro-siting of FTUs and associated offshore infrastructure, including cable routes.	Primary	Pre-construction cable route survey to confirm the condition of the seabed and that no significant changes have occurred from previous surveys, confirm the presence of morphological features and the requirement for micro-siting around these or completion of seabed preparation works. The final Array Area layout (including IACs) and Import / Export Cable Route will be presented within the Development Specification and Layout Plan (DSLP) and will include micro-siting of infrastructure to avoid sensitive habitats or features. Where possible, the Export / Import Cable Route will aim to avoid sensitive habitats and, where this is not practicable, the route will be designed to achieve the least impact to sensitive habitats or features.	Final layout will be captured in the DSLP, required under Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-005	Target Depth of Lowering (DoL)	Primary	Static cables will be trenched and buried to a minimum depth of 0.4 m. Where this cannot be achieved, remedial cable protection will be applied. The cable burial target depth is informed by a Cable Burial Risk Assessment (CBRA) and implemented through the Cable Plan (CaP), which will be produced post-consent. Electromagnetic Field (EMF) emissions associated with the cabling will be reduced by burial of between 90-100% of the cables at the depth between 0.4 – 1.5 m.	Final cable design will be informed by the CBRA and detailed within the CaP, required under Section 36 Consent and/or Marine Licence conditions.
MM-006	Environmental Management Plan (EMP)	Tertiary	The EMP will set out procedures to ensure all activities with the potential to affect the environment are appropriately managed and will include a description of planned activities and procedures, roles and responsibilities, pollution control and spillage response plans, incident reporting, chemical usage requirements, waste management plans, plant service procedures, communication and reporting structures, and programme of work. It will detail the final design selected and take into account Marine Licence conditions and commitments. The EMP will additionally include an Invasive Non Native Species (INNS) Management Plan (INNSMP) and a Marine Pollution Contingency Plan (MPCP) and will be developed in consultation with stakeholders.	The EMP, including the INNSMP and MPCP, will be required under Section 36 Consent and/or Marine Licence conditions. An outline EMP is provided as part of the Application **EIAR Vol. 4, Appendix 32: Outline EMP**.
MM-007	Construction Method Statement (CMS)	Tertiary	A CMS will be developed to manage the construction process so as to avoid harm to construction personnel and third parties. The CMS will specify the Project's construction methods, setting out good practice construction measures and how agreed mitigation measures from the EIAR, associated documents, Section 36 Consent, Marine Licences and those stated within the EMP are implemented during construction.	The CMS will be required under Section 36 and/or Marine Licence conditions.
MM-008	Cable Plan (CaP)	Tertiary	The CaP will be provided post-consent and will detail the location / route and cable laying techniques of the IACs and Export / Import Cable and	Final cable design will be informed by the CBRA and detailed within the

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			detail the methods for cable surveys during the operational life of the cables for the Project. This will be supported by survey results from the geotechnical, geophysical and benthic surveys. The CaP will also detail EMF of the cables deployed and methods to mitigate against any effects of EMF. A CBRA will also be undertaken and results included within the CaP which will detail cable specifications, cable installation, cable protection, target burial depths / DoL and any hazards the cable will present during the lifespan of the cable. The CaP will also include methodologies of post construction and operational surveys and methodologies for cable inspection with measures to address and report any exposure of cables.	CaP, required under Section 36 Consent and/or Marine Licence conditions.
MM-009	Decommissioning Programme	Tertiary	The development of, and adherence to, a Decommissioning Programme, approved by Scottish Ministers prior to construction and updated throughout the Project's operational life. This will be written in accordance with applicable guidance and will detail the required activities, programme and environmental management for decommissioning.	The Decommissioning Programme will be required under Section 105 of the Energy Act 2004 (as amended) and a condition of the Section 36 Consent.
MM-010	Marine Pollution Contingency Plan (MPCP)	Tertiary	Accidental releases to the marine environment will apply strict environmental controls through the implementation of the Environmental Management Plan (EMP), which will include a MPCP. These plans will detail procedures in the event of an accidental release, characterise all sources for potential contaminant releases and provide key emergency contact details for use in the event of a release. Measures detailed in the EMP and MPCP will be in accordance with Oslo-Paris Convention (OSPAR) and Marine Pollution (MARPOL) Convention guidelines for preventing pollution at sea. Individual vessels will also have a Ship Oil Pollution Emergency Plan (SOPEP) in place. For these reasons, the potential for accidental release of contaminants is extremely unlikely and any incidents would be responded to quickly, with strict controls to effectively minimise the scale and impact of any accidental release on the marine environment.	The MPCP will be required under Section 36 Consent and/or Marine Licence conditions as part of the EMP. An outline EMP is provided as part of the Application EIAR Vol. 4, Appendix 32: Outline EMP.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-011	Use of Anti-fouling Systems.	Tertiary	International Maritime Organization (IMO) International Convention on the Control of Harmful Anti-Fouling Systems on Ships 2001 will be adhered to, in order to minimise the potential for toxic effects to the wider environment.	Details of anti-fouling measures will be provided within the EMP, required under Section 36 Consent and/or Marine Licence conditions. An outline EMP is provided as part of the application EIAR Vol. 4, Appendix 32: Outline EMP.
MM-012	Removal of marine growth.	Primary	Removal of marine growth contributes to the management of potential risks associated with INNS. The substructures, moorings and dynamic IACs will be designed to accommodate marine growth; however, to manage weight / drag-induced fatigue, growth levels will be inspected annually, and any required removal of marine growth will be completed using water jetting tools.	Details on removal of marine growth will be provided within the EMP and the Operations and Maintenance Programme (OMP) required under Section 36 Consent and/or Marine Licence conditions.
MM-013	Operations and Maintenance Programme (OMP)	Tertiary	The OMP will set out the procedures and good practice measures for operation and maintenance of the Project Infrastructure. The OMP will include consideration for environmental sensitivities, to appropriately safeguard environmental receptors during the operation and maintenance phase of the Project.	Required under Section 36 Consent and/or Marine Licence conditions.
MM-014	Adherence to the International Convention for the Control and Management of Ships' Ballast Water and Sediments.	Primary	The Project will adhere with the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (United Kingdom (UK) Government, 2004). The Ballast Water Management (BWM) Convention aims to prevent the spread of harmful aquatic organisms, including INNS from one region to another, by establishing standards and procedures for the management and control of ships' ballast water and sediments. Measures will be adopted to ensure that the risk of marine INNS introduction during construction, operation and maintenance, and	The EMP, including the INNSMP and MPCP, will be required under Section 36 Consent and/or Marine Licence conditions. An outline EMP is provided as part of the Application EIAR Vol. 4, Appendix 32: Outline EMP.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			decommissioning is reduced. An INNSMP will be developed in consultation with stakeholders and will be included within the EMP.	
MM-015	Invasive non-native species Management Plan (INNSMP)	Tertiary	An INNSMP will be developed and adhered to by the Project. It will set out methods for minimising the potential for the introduction and spread of INNS. The plan will include, but may not be limited to, measures to facilitate vessel compliance with the International Maritime Organisation (IMO) ballast water management guidelines (UK Government, 2004) and adherence to the IMO guidelines for the control and management of ships' biofouling to minimise the transfer of invasive aquatic species (IMO, 2023). Adopting these protocols will reduce risk in relation to the spread of INNS across all phases of the Project.	The EMP, including the INNSMP and MPCP, will be required under Section 36 Consent and/or Marine Licence conditions. An outline EMP is provided as part of the Application EIAR Vol 4, Appendix 32: Outline EMP.
MM-016	Minimum spacing between FTUs.	Primary	928 m spacing between FTU structures at the surface and a minimum of 50 m between anchors. Marine Mammals - The minimum spacing will allow passage of marine mammals through the area, avoiding the potential for a physical barrier effect and reducing the likelihood of any acoustic barrier effect.	The final layout will be detailed within the DSLP, required under Section 36 and/or Marine Licence conditions.
MM-017	Mooring lines will be sufficiently taut and rigid to prevent formation of loops, preventing primary entanglement.	Primary	Mooring lines will be taut and rigid, avoiding the risk of primary entanglement (i.e. in the mooring lines themselves) to marine mammals.	The final mooring design will be detailed within the DSLP required under Section 36 Consent and/or Marine Licence conditions.
MM-018	Unexploded Ordnance (UXO) clearance approach.	Primary	In the event that a UXO is identified within the Project construction area, a hierarchy of mitigation will be applied: 1. Micro-siting/micro-rerouteing will be used to avoid UXO in the first instance.	Any clearance activity will be subject to a separate Marine Licence and European Protected Species (EPS) Licence, which will be accompanied

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			2. Where micro- siting/micro-rerouting is not possible, the UXO will be moved to a safe location outwith the corridor or working area; 3. In cases where UXO cannot be avoided or pose a safety concern, Low Order clearance methods, such as deflagration will be applied. 4. In cases where UXO cannot be avoided or pose a safety concern and Low Order clearance methods have not been successful, High Order (i.e. detonation) may be required. However, this method will only be used where absolutely necessary, in agreement with Scottish Ministers.	by supporting environmental information.
MM-019	Piling Strategy (PS) (if impact piling is required)	Tertiary	If impact piling is selected as the optimal installation mechanism for the FTUs/ Offshore Substation Platforms (OSCPs), a PS will be produced for the Project and implemented in line with relevant guidance. The strategy will provide details on the piling activities and parameters, expected noise levels, duration of activities and any required mitigations associated with this installation technique. The PS will delineate the requirement for and nature of noise mitigation measures to be implemented (documented in the MMMP) during piling activities (including soft-start and ramp-up procedures).	The PS will be required under Section 36 Consent and/or Marine Licence conditions, An outline MMMP is provided as part of the Application **EIAR Vol. 4, Appendix 33: Outline MMMP**.
MM-020	Marine Mammal Mitigation Protocol (MMMP)	Tertiary	The MMMP will outline protocols to reduce underwater noise impacts on marine mammals in relation to pre-construction and construction activities, including geophysical surveys, UXO clearance and pile driving. This will include the use of Acoustic Deterrent Devices (ADDs) to deter marine mammals from the zone within which they could experience acoustic injury, visual observations undertaken by Marine Mammal Observers (MMOs) prior to the commencement of impact piling to ensure that no marine mammals will be exposed to the highest levels of underwater noise, in line with Joint Nature Conservation Committee (JNCC) (2010) guidelines. During hours of darkness or in poor weather conditions, observation of	The MMMP will be required under Section 36 Consent and/or Marine Licence conditions. An outline MMMP is provided as part of the Application **EIAR Vol. 4, Appendix 33: Outline MMMP**.

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			marine mammals within the mitigation zone will be undertaken using a Passive Acoustic Monitoring (PAM) system by a qualified PAM Operator.	
MM-021	Vessel Management Plan (VMP)	Tertiary	A VMP will be developed and adhered to for the Project. The VMP will detail types, specifications and numbers of vessels, how vessel management will be coordinated and the location of ports, routes of passage and number of transits for the Project. The VMP will refer to the Scottish Marine Wildlife Watching Code and Guide to Best Practice for Watching Marine Wildlife for guidance on how vessels should behave around Marine Wildlife. Marine Mammals – To reduce potential for collision risk or injury to marine species, the Scottish Marine Wildlife Watching Code will be issued to all Marine Scheme vessels to be adhered to at all times, including a toolbox talk with the vessel crew ahead of mobilisation. This will include requirements to: • Not deliberately approach marine mammals or basking sharks; • Maintain a minimum vessel speed; and • Avoid abrupt changes to vessel speed or direction should a marine mammal approach the vessel.	A VMP will be required under the Section 36 Consent and/or Marine Licence conditions.
MM-022	Removal of debris from floating lines and cables to minimise potential for secondary entanglement.	Primary	Mooring lines and dynamic IACs will be inspected with a risk-based frequency using a Service Operations Vessel (SOV) which may be equipped with Remotely Operated Vehicles (ROV) used for subsea inspections. Over the operational life-cycle of the Project, inspections will be completed, starting at a higher frequency and likely declining after a number of years, based on evidence gathered during inspections. Any observed / detected debris on the floating lines and cables will be recovered based on a risk assessment which considers impact on	This measure will be secured through production and approval of an EMP and OMP required under Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			environment, risk to asset integrity, risk to personnel and equipment, and cost of intervention.	
MM-023	Consideration of commercial fisheries receptors in Project design.	Primary	Consultation on Project design and infrastructure specifications will be undertaken with Scottish Ministers and stakeholders throughout the post-consent phase of the Project. The final cable route and design will be informed by the CBRA and will be detailed within the CaP. The final FTU layout will be presented within the DSLP.	The final cable route and design will be informed by the CBRA and will be detailed within the CaP. The final FTU layout will be presented within the DSLP. The CaP and DSLP are required under Section 36 and/or Marine Licence conditions.
MM-024	Boulder relocation.	Primary	As part of site preparation activities, any boulders removed from the Project Area and relocated will be accurately recorded and charted where feasible.	Secured under Section 36 and/or Marine Licence conditions.
MM-025	The use of guard vessels and Offshore Fisheries Liaison Officers (OFLOs).	Primary	Where required, guard vessels and OFLOs will be in place within the marine environment during the construction phase, major maintenance and decommissioning works. Guard vessels will ensure that effective communication between the Project and other sea users (including commercial fishers) is maintained, therefore reducing the potential for interactions between fishers and Project vessels and activities.	Requirements will be detailed within the FMMS, required under Section 36 Consent and/or Marine Licence conditions. An outline FMMS is provided as part of the Application **EIAR Vol. 4, Appendix 34: Outline FMMS**.
MM-026	Fisheries Management and Mitigation Strategy (FMMS)	Tertiary	The FMMS will be developed further in consultation with the fishing industry post consent. The FMMS will expand on the detail of the Project's approach to fisheries liaison and co-existence within the marine environment	Required under Section 36 Consent and/or Marine Licence conditions. An outline FMMS is provided as part of the Application **EIAR Vol. 4, Appendix 34: Outline FMMS**. The

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
				outline FMMS also contains details on the proposed approach for fisheries liaison.
MM-027	Appointment of a Fisheries Liaison Officer (FLO).	Tertiary	A FLO has been appointed by the Project. The FLO will maintain communication with the fishing industry and other users of the sea, where required, throughout all phases of the Project (including pre-construction, construction, operation and maintenance and decommissioning). The FLO will distribute information on the safe operations of fishing activities at the site and will be a contact for fishermen and other sea users during the lifetime of the Project. The details of fisheries liaison for the Project, including the roles and responsibilities of the FLO will be detailed within the FMMS.	Appointment of an FLO will be required under Section 36 Consent and/or Marine Licence conditions. Details on the fisheries liaison for the Project, will be detailed in the FMMS, required under Section 36 Consent and/or Marine Licence conditions. An outline FMMS is provided as part of the Application **EIAR Vol. 4, Appendix 34: Outline FMMS**. The outline FMMS also contains details on the proposed approach for fisheries liaison.
MM-028	Promulgation of information, such as Notice to Mariners (NtM), Kingfisher notifications and other navigational warnings.	Tertiary	Timely and efficient distribution of NtM and Kingfisher notifications will inform third party vessels of the position and nature of works associated with the Project. Information will include but not be limited to vessel routes, timings and locations, safety zones and advisory safe passing distances as required.	Procedures will be detailed within the Navigational Safety Plan (NSP) and the FMMS, required under Section 36 and/or Marine Licence Conditions. An outline FMMS is provided as part of the Application **EIAR Vol. 4, Appendix 34: Outline FMMS**.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-029	Compliance from all project vessels with International Regulations for the Prevention of Collision at Sea (COLREGs) and International Regulations for the Safety of Life at Sea (SOLAS).	Tertiary	All Project vessels will comply with the provisions of COLREGs and SOLAS, including displaying appropriate lights and shapes to indicate the nature of the work in progress and when vessels are Restricted in their Ability to Manoeuvre. All project vessels will also broadcast via Automatic Identification System (AIS).	Legislative requirement that will be detailed within the EMP, NSP and the FMMS, required under Section 36 Consent and/or Marine Licence conditions. An outline FMMS and EMP is provided as part of the Application EIAR Vol. 4, Appendix 34: Outline FMMS and EIAR Vol. 4, Appendix 32: Outline EMP.
MM-030	Procedure for accidental deposit of object(s) at sea.	Tertiary	A procedure will be developed and implemented to manage and mitigate the effects of any accidental deposit of object(s) on the seabed during works associated with the Project. This procedure will align with the Marine Directorate's (2024) Accidental Deposit of an Object at Sea Guidance. Accidental deposit(s) will be reported using published reporting forms (Marine Directorate, November 2024) and relevant parties will be notified at the time of recognition. Recovery will be attempted by the Project for all deposits and confirmed whether successful with the regulator and relevant stakeholders.	Procedures will be detailed within the EMP and FMMS, required under Section 36 and/or Marine Licence conditions. An outline FMMS and EMP is provided as part of the Application EIAR Vol. 4, Appendix 34: Outline FMMS and EIAR Vol. 4, Appendix 32: Outline EMP
MM-031	Lighting and Marking Plan (LMP)	Tertiary	Aviation - The LMP will set out specific requirements in terms of aviation lighting to be installed on the Wind Turbine Generators (WTGs), as required under Civil Aviation Authority (CAA) (2016) Civil Aviation Publication (CAP) 393, Air Navigation: The Order and the Regulations". The LMP will be prepared in consultation with the CAA, Ministry of Defence (MoD), Maritime and Coastguard Agency (MCA) and Northern Lighthouse Board (NLB) and will consider requirements for aviation lighting as specified in	Lighting and marking requirements will be detailed in the LMP, required under Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			Article 223 of the UK Air Navigation Order (ANO) (CAA, 2016) and changes to International Civil Aviation Organisation Annex 14 (2016). Shipping and Navigation - The LMP will set out specific requirements in terms of marine lighting and marking of the WTGs and OSCPs during the construction and operational phases. This will comply with NLB requirements, the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162 Guidance on the Marking of Offshore Man-Made Structures (IALA, 2021), and Marine Guidance Note (MGN) 654 (MCA, 2021). Ornithology – The LMP will set out specific requirements in relation to aviation and shipping and navigation which will ensure FTUs are not excessively lit. The reduction of the amount of lighting on FTUs will minimise the risk of avoidance, attraction or disorientation of ornithological receptors in relation to FTUs.	
MM-032	Development Specification and Layout Plan (DSLP)	Tertiary	The DSLP will confirm the final specification and layout of the Project Area. The Plan will include location and coordinates of all Offshore Wind Farm (OWF) infrastructure including cables and the final design parameters of the OWF.	The DSLP is required under Section 36 Consent and/or Marine Licence consent conditions.
MM-033	Charting of installed infrastructure.	Tertiary	Notification to the UK Hydrographic Office (UKHO) and Kingfisher of the proposed location and programme of works will facilitate the promulgation of maritime safety information and updating of nautical/admiralty charts and publications. All Project infrastructure (including FTUs, substations, subsea cables and mooring lines) will be marked on appropriately scaled nautical charts.	Charting requirements will be secured under a Marine Licence condition. Details will also be included in the FMMS, LMP, and NSP also required under the Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			All structures more than 91.4 m in height will be charted on aeronautical charts and reported to the Defence Geographic Centre (DGC) (Digital Vertical Obstruction File) at least ten weeks prior to construction in line with LMP.	An outline FMMS is provided as part of the Application **EIAR Vol. 4, Appendix 34: Outline FMMS**.
MM-034	Navigational Safety Plan (NSP)	Tertiary	The NSP provides information on navigational safety for the Project. It will provide the required information on navigational safety measures, construction exclusion zones (if relevant) NtMs and radio navigation warnings, anchoring areas, temporary construction lighting and marking, buoyage, post construction monitoring and hydrographic surveys taking into account all recommendations in the MGN 654 and its annexes.	The NSP will be required under Section 36 Consent and/or Marine Licence conditions.
MM-035	Application for and implementation of safety zones	Primary	Safety zones will be applied during construction and periods of major maintenance, and either statutory or advisory safety zones during operation (to be agreed during further consultation). Full details will be provided in the safety zone application; however, it is likely that the standard set of safety zones will be applied for: • Statutory 500 m rolling safety zones around FTUs and OSCPs where construction is ongoing as denoted by the presence of a construction vessel; • Safety zones of 50 m will be in place around FTUs and OSCPs during the construction phase when construction is not underway prior to commissioning of the windfarm; and; and • Temporary 500 m safety zones around structures where major maintenance is ongoing (as defined in The Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007).	An application for safety zones will be made in accordance with Section 95 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007. Details will be included within the NSP, required under Section 36 Consent and/or Marine Licence conditions.

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			Where safety zones do not apply (e.g., around cable installation), use of advisory safe passing distances will be implemented.	
MM-036	Establishment of a Marine Coordination Centre.	Primary	The Marine Coordination Centre is the hub of the Project during construction and will also be used for operations and maintenance. The purpose of a Marine Coordination Centre is to ensure Project vessels are suitably managed to minimise the likelihood of involvement in incidents and ensure safe operation during all phases. Personnel within the Marine Coordination Centre function as the first point of contact for vessels operating within the Project Area and agreed transit routes.	Details of marine coordination will be provided within the VMP and NSP required under Section 36 Consent and/or Marine Licence conditions.
MM-037	Compliance with Marine Guidance Note 654.	Tertiary	The Project will comply with MGN 654 and its annexes to ensure that impacts on navigational safety and emergency response are considered, assessed and mitigated where necessary. This includes post-consent completion of the Search and Rescue (SAR) Checklist, which includes the completion of an Emergency Response Cooperation Plan (ERCoP). This will include, but is not limited to: • Layout design; • Agreement of SAR checklist and ERCoP with MCA; • Hydrographic surveys; and • Maximum 5% reduction in surrounding charted depths referenced to Chart Datum unless otherwise agreed with the Scottish Ministers in consultation with MCA.	Compliance with MGN 654 will be detailed within the NSP and ERCoP required under Section 36 Consent and/or Marine Licence conditions.
MM-038	Compliance with regulatory expectations on mooring devices for floating wind and marine devices.	Tertiary	Compliance with the regulatory expectations on mooring devices for floating wind and marine devices (MCA & Health and Safety Executive (HSE) 2017), in particular the requirement to undertake Third Party Verification of the mooring lines and implement appropriate monitoring of the FTUs to provide an alert in case of mooring failure.	Required under Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-039	Minimum air gap (in normal operating conditions) of 22 m above Mean High Water Springs (MHWS).	Primary	Compliance with MCA and RYA requirements around a minimum air gap. In particular ensuing a minimum air gap of 22 m is maintained in normal operating conditions, in order to minimise the risk of allision.	Mitigation by design.
MM-040	Crossing and proximity agreements.	Primary	Crossing and proximity agreements for existing seabed infrastructure such as pipelines and cables will be agreed post-consent with the relevant asset owners, once the Project layout has been finalised. It will be the responsibility of the respective Pipeline Asset Operators to inform the North Sea Transition Authority (NSTA) and also the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED's) - Offshore Decommissioning Unit (OPRED-ODU) to determine if any updates to existing Pipeline Works Authorisations (PWAs) or decommissioning plans are required. Cable crossings will be perpendicular (or as close as possible to 90°) to minimise the physical interaction and therefore limit the risk of damage to the existing pipeline or cable.	Secured through consultation with relevant stakeholders and the commitment of the Applicant to discuss and establish crossing and proximity agreements with relevant third-parties. This will be part of a commitments register that will be tracked as the Project progresses alongside Section 36 Consent and Marine Licence conditions.
MM-041	Consultation with The Civil Aviation Authority (CAA).	Primary	The CAA will be informed of the locations, heights and lighting status of the WTGs, including estimated and actual dates of construction and the maximum heights of any construction equipment to be used, prior to the start of construction.	Required under Section 36 Consent and/or Marine Licence conditions.
MM-042	Notice to Aviation (NOTAM) system.	Primary	Any temporary obstacles associated with FTUs which are more than 91.4 m in height (e.g. construction infrastructure such as cranes and/or meteorological masts) are to be alerted to aircrews by means of the NOTAM system, in line with consultation with the CAA.	Commitment to notification of temporary obstacles and will also be detailed in the NSP which will be required under the Section 36 Consent and/or Marine Licence conditions.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-043	Marking of project infrastructure on aeronautical charts and reporting to the Defence Geographic Centre.	Tertiary	CAA will be informed of the locations, heights and lighting status of the WTGs, including estimated and actual dates of construction and the maximum heights of any construction equipment to be used, prior to the start of construction. All structures more than 91.4 m in height will be charted on aeronautical charts and reported to the Defence Geographic Centre (Digital Vertical Obstruction File) at least ten weeks prior to construction in line with the LMP and DSLP. Consultation with the CAA, MCA, MoD and NLB prior to agreement of the LMP and the DSLP. The DSLP will confirm the final specification and layout of the Project Area. The Plan will include coordinates of OWF infrastructure and the final design parameters of the OWF.	Marking requirements will be a condition of the Marine Licence conditions. The LMP and DSLP is required under the Section 36 Consent and/or Marine Licence conditions.
MM-044	Crown Estate Scotland (CES) Innovation and Targeted Oil & Gas (INTOG) commitments, including production of a Supply Chain Development Statement (SCDS).	Primary	The Applicant will submit a SCDS as part of the Application to enter an Option Agreement under the INTOG process with CES. The SCDS will detail the scale and nature of project expenditure. The information within the SCDS will be available to a range of stakeholders.	Will be provided to CES by the Applicant in advance of Option Agreements being executed.
MM-045	Supply chain engagement.	Primary	Existing supply chain initiatives will be utilised and new ones created to alert potential regional and local suppliers to the types, scale, and timing of services that are likely to be required to develop and install the Project. Such engagement seeks to ensure that economic benefits associated with the Project are realised regionally and locally.	Secured via the SCDS.
MM-046	Community benefits fund.	Primary	A funded mechanism supporting local skills and training is expected to be included as a key element of the community benefits fund currently being developed for the Project. The fund seeks to ensure the local workforce is adequately skilled and trained.	Secured via the SCDS

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-047	Community Liaison Officer (CLO).	Primary	A CLO has been appointed for the Project and acts as the face of the Project with the local community. The CLO reports and monitors any concerns raised in the local community. This role will remain active and will continue to grow as the Project progresses. The CLO's role will be carried out in line with the Applicant's (ESG) standards.	Secured via the SCDS
MM-048	Skills and Employment Plan	Primary	A Skills and Employment Plan will be prepared prior to the Project commencing operation.	Secured via the SCDS
MM-049	Opportunities for the reduction of Greenhouse Gas (GHG) emissions will be embedded throughout the Project lifecycle	Primary	These opportunities will be determined at each phase of the Project and include sustainable product selection and raw material use during the maintenance, repair and replacement periods. Details will be included within the EMP.	This will be detailed within the EMP required under the Section 36 Consent and/or Marine Licence conditions.
MM-050	Optimisation of vessel movements associated with the Project	Tertiary	Transportation of components and materials should be optimised where possible. (e.g. reducing distance of travel). Details will be included within the EMP (see above).	This will be detailed within the EMP required under the Section 36 Consent and/or Marine Licence conditions.
MM-051	Archaeological Exclusion Zones (AEZs).	Primary	Archaeological Exclusion Zones (AEZs) and Temporary Archaeological Exclusion Zones (TAEZs) will be implemented around identified (known) and potential Marine Archaeological receptors. The extents of exclusion zones will be determined by the potential significance of the receptor, the seabed dynamics, the potential impacts, and extents of any outlying debris. The exclusion zones will be agreed with the Archaeological Curator and will remain for the lifetime for the Project, or until further works are undertaken to allow re-assessment.	AEZs have been embedded into the Project design and through adherence to the WSI (details of AEZs to be held therein) An outline Written Scheme of Investigation (WSI) & Protocol for Archaeological Discoveries (PAD) is provided as part of the Application

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
				EIAR Vol. 4, Appendix 27: WSI & PAD.
MM-052	Retained Archaeologist	Primary	The Project will retain the services of an archaeological consultant, the 'Retained Archaeologist', to implement the WSI. The Retained Archaeologist will provide guidance as to the requirements for archaeological assessment of further pre-construction surveys, and the specifications of such surveys. This can include, but is not limited to, geophysical, hydrographic, ROV, diver, and geotechnical surveys. The Retained Archaeologist will provide input into site preparation, pre-construction, and construction activities where appropriate and where archaeological monitoring of such works may be required.	Embedded into the Project design and through adherence to the WSI (details of archaeological involvement in further surveys to be held therein) An outline WSI & PAD is provided as part of the Application EIAR Vol. 4, Appendix 27: WSI & PAD.
MM-053	Archaeological assessment of geotechnical samples	Primary	The archaeological assessment of geotechnical samples will be undertaken as necessary, informed by the interpretated potential of the Project Area. The archaeological assessment of geotechnical samples will be preceded by a Method Statement and will follow a staged process after *Offshore Geotechnical Investigations and Historic Environment Analysis: Guidance for the Renewable Energy Sector* (COWRIE, 2011).	Embedded into the Project design and through adherence to the WSI (details of geoarchaeological assessment and staged process to be held therein). An outline WSI & PAD is provided as part of the Application EIAR Vol. 4, Appendix 27: WSI & PAD.
MM-054	Protocol for Archaeological Discoveries	Tertiary	The Protocol for Archaeological Discoveries provides the mechanism for the reporting of unexpected finds of potential archaeological interest, and the subsequent treatment of such finds. The protocol does not replace archaeological processes but enhances the protection for the historic environment. The Protocol also provides	Adherence to the PAD (details of protocol to be held therein) An outline WSI & PAD is provided as part of the Application EIAR Vol. 4, Appendix 27: WSI & PAD.

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
			additional mitigation for geophysical anomalies interpreted as of low archaeological potential.	
MM-055	Written Scheme of Investigation (WSI)	Tertiary	The WSI will follow the best practice as outlined in *Archaeological Written Schemes of Investigation for Offshore Windfarm Projects* (The Crown Estate, 2021). The WSI; • Sets out the roles and respective responsibilities of the Applicant, Contractors and Retained Archaeologist and Archaeological Contractor(s); • Outlines the known and potential archaeological receptors that could be impacted by the Project; • Sets out the importance of research frameworks in setting objectives that may be delivered through realisation of the known and potential archaeology; • Outlines the agreed mitigation and archaeological actions that are to take place in various circumstances; and • Provides methodologies for these archaeological actions, to be employed on archaeological work conducted in the post-consent period.	An outline WSI & PAD is provided as part of the Application **EIAR Vol. 4, Appendix 27: WSI & PAD.**
Secondary mitigation measures				
MM-056	Communication and liaison procedures with Peterhead Port Authority	Secondary	To mitigate the impact of reduced access to local ports and harbours during construction, the additional mitigation of communication and liaison procedures with Peterhead Port Authority has been identified as a necessary mitigation.	Secured via the SCDS

CODE	MITIGATION MEASURE	TYPE	DESCRIPTION	SECURED BY
MM-057	Conduct comprehensive community consultation and engagement	Secondary	Once further engineering and supply chain analysis has been conducted, comprehensive community consultation and engagement will be undertaken to ensure that the work of the CLO and the community benefit fund is focused on areas with the greatest need. Specific attention should be given to areas with the most deprived data zones. This additional analysis will be documented within the SCDS.	Secured via the SCDS
MM-058	Adherence to the Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Guidance (FLOWW, 2015) and development of cooperation agreements	Secondary	The Applicant will continue engagement with the fishing industry and stakeholders directly impacted by construction works and will adhere to the FLOWW (2015) guidance by developing evidence-based cooperation agreements for vessels required to relocate their static gear during the construction, maintenance and decommissioning periods.	Details will be included in the FMMS and will be in adherence with the FLOWW (2015) guidance. Secured through the Section 36 Consent and/or Marine Licence conditions. An outline FMMS is provided as part of the Application EIAR Vol. 4 Appendix 34: Outline FMMS.

22.1.1 Summary

Table 22-2 Overarching Mitigation

CODE	MITIGATION MEASURE	CHAPTER 8: MARINE GEOLOGY, OCEANOGRAPHY AND COASTAL PROCESSES	CHAPTER 9: MARINE WATER AND SEDIMENT QUALITY	CHAPTER 10: BENTHIC ECOLOGY	CHAPTER 11: MARINE MAMMAL ECOLOGY	CHAPTER 12: ORNITHOLOGY	CHAPTER 13: FISH AND SHELLFISH ECOLOGY	CHAPTER 14: COMMERCIAL FISHERIES	CHAPTER 15: SHIPPING AND NAVIGATION	CHAPTER 16: MARINE ARCHAEOLOGY	CHAPTER 17: INFRASTRUCTURE AND OTHER SEA USERS	CHAPTER 18: MILITARY AND CIVIL AVIATION	CHAPTER 19: SOCIOECONOMICS, TOURISM, AND RECREATION	CHAPTER 20: CARBON AND GREENHOUSE GASES	CHAPTER 21: MAJOR DISASTERS
MM-001	Use of Horizontal Directional Drilling as the landfall cable installation option	✓		✓											
MM-002	Mooring and anchor design to ensure reduction of habitat loss and disturbance	✓		✓			✓							✓	
MM-003	Design of scour protection to minimise introduction of hard substrate	✓		✓											
MM-004	Micro-siting of Floating Turbine Units (FTU) and associated offshore infrastructure, including cable routes	✓		✓			✓				✓				
MM-005	Target Depth of Lowering (DoL)	✓		✓	✓		✓	✓							✓
MM-006	Environmental Management Plan (EMP)	✓	✓	✓	✓	✓	✓				✓	✓	✓	✓	✓
MM-007	Construction Method Statement (CMS)	✓				✓	✓								✓
MM-008	Cable Plan (CaP)	✓		✓			✓	✓	✓						✓
MM-009	Decommissioning Programme		✓	✓	✓		✓			✓	✓	✓		✓	✓
MM-010	Marine Pollution Contingency Plan (MPCP)		✓	✓		✓	✓		✓						✓
MM-011	Use of Anti-fouling Systems		✓												
MM-012	Removal of marine growth			✓											
MM-013	Operations and Maintenance Programme (OMP)			✓								✓			
MM-014	Adherence to the International Convention for the Control and Management of Ships' Ballast Water and Sediments			✓											
MM-015	Invasive Non-Native Species Management Plan (INNSMP)			✓											
MM-016	Minimum spacing between FTUs				✓							✓			✓

CODE	MITIGATION MEASURE	CHAPTER 8: MARINE GEOLOGY, OCEANOGRAPHY AND COASTAL PROCESSES	CHAPTER 9: MARINE WATER AND SEDIMENT QUALITY	CHAPTER 10: BENTHIC ECOLOGY	CHAPTER 11: MARINE MAMMAL ECOLOGY	CHAPTER 12: ORNITHOLOGY	CHAPTER 13: FISH AND SHELLFISH ECOLOGY	CHAPTER 14: COMMERCIAL FISHERIES	CHAPTER 15: SHIPPING AND NAVIGATION	CHAPTER 16: MARINE ARCHAEOLOGY	CHAPTER 17: INFRASTRUCTURE AND OTHER SEA USERS	CHAPTER 18: MILITARY AND CIVIL AVIATION	CHAPTER 19: SOCIOECONOMICS, TOURISM, AND RECREATION	CHAPTER 20: CARBON AND GREENHOUSE GASES	CHAPTER 21: MAJOR DISASTERS
MM-017	Mooring lines will be sufficiently taut and rigid to prevent formation of loops, preventing primary entanglement				✓										
MM-018	Unexploded Ordnance (UXO) clearance approach				✓		✓				✓				✓
MM-019	Piling Strategy (PS) if impact piling is required				✓		✓								✓
MM-020	Marine Mammal Mitigation Protocol (MMMP)				✓										
MM-021	Vessel Management Plan (VMP)				✓	✓		✓							✓
MM-022	Removal of debris from floating lines and cables to minimise potential for secondary entanglement				✓		✓								
MM-023	Consideration of commercial fisheries receptors in Project design							✓							
MM-024	Boulder relocation							✓							
MM-025	The use of guard vessels and Offshore Fisheries Liaison Officers (OFLOs)							✓	✓						✓
MM-026	Fisheries Management and Mitigation Strategy (FMMS)							✓							✓
MM-027	Appointment of a Fisheries Liaison Officer (FLO)							✓							
MM-028	Promulgation of information such as Notice to Mariners, Kingfisher notifications and other navigational warnings							✓	✓		✓				✓
MM-029	Compliance from all project vessels with International Regulations for the Prevention of Collision at Sea (COLREGs) and International Regulations for the Safety of Life at Sea (SOLAS).							✓	✓						
MM-030	Procedure for accidental deposit of object(s) at sea.							✓	✓		✓				

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MM-031	Lighting and Marking Plan (LMP)					✓			✓		✓	✓			✓
MM-032	Development Specification and Layout Plan (DSLP)				✓							✓			✓
MM-033	Charting of installed infrastructure							✓	✓			✓			✓
MM-034	Navigational Safety Plan (NSP)								✓						✓
MM-035	Application for and implementation to safety zones							✓	✓		✓				✓
MM-036	Establishment of a Marine Coordination Centre										✓				✓
MM-037	Compliance with Marine Guidance Note (MGN) 654								✓			✓			✓
MM-038	Compliance with regulatory expectations on mooring devices for floating wind and marine devices								✓						
MM-039	Minimum air gap (in normal operating conditions) of 22 m above Mean High Water Springs (MHWS)								✓						
MM-040	Crossing and proximity agreements							✓							✓
MM-041	Consultation with Civil Aviation Authority (CAA)											✓			
MM-042	Notice to Aviation (NOTAM) system											✓			✓
MM-043	Marking of project infrastructure on aeronautical charts and reporting to the Defence Geographic Centre											✓			
MM-044	Crown Estate Scotland (CES) Innovation and Targeted Oil & Gas (INTOG) commitments including production of a Supply Chain Development Statement												✓		
MM-045	Supply chain engagement												✓		
MM-046	Community benefits fund												✓		
MM-047	Community Liaison Officer (CLO)												✓		

CODE	MITIGATION MEASURE	CHAPTER 8: MARINE GEOLOGY, OCEANOGRAPHY AND COASTAL PROCESSES	CHAPTER 9: MARINE WATER AND SEDIMENT QUALITY	CHAPTER 10: BENTHIC ECOLOGY	CHAPTER 11: MARINE MAMMAL ECOLOGY	CHAPTER 12: ORNITHOLOGY	CHAPTER 13: FISH AND SHELLFISH ECOLOGY	CHAPTER 14: COMMERCIAL FISHERIES	CHAPTER 15: SHIPPING AND NAVIGATION	CHAPTER 16: MARINE ARCHAEOLOGY	CHAPTER 17: INFRASTRUCTURE AND OTHER SEA USERS	CHAPTER 18: MILITARY AND CIVIL AVIATION	CHAPTER 19: SOCIOECONOMICS, TOURISM, AND RECREATION	CHAPTER 20: CARBON AND GREENHOUSE GASES	CHAPTER 21: MAJOR DISASTERS
MM-048	Skills and Employment Plan												✓		
MM-049	Opportunities for the reduction of Greenhouse Gas (GHG) emissions will be embedded throughout the Project lifecycle													✓	
MM-050	Optimisation of vessel movements associated with the Project													✓	
MM-051	Archaeological Exclusion Zones									✓					
MM-052	Retained Archaeologist									✓					
MM-053	Archaeological assessment of geotechnical samples									✓					
MM-054	Protocol for Archaeological Discoveries									✓					
MM-055	Written Scheme of Investigation									✓					
Secondary Mitigation Measures															
MM-056	Communication and liaison procedures with Peterhead Port Authority												✓		
MM-057	Conduct comprehensive community consultation and engagement												✓		
MM-058	Adherence to the FLOWW Guidance (FLOWW, 2015) and development of cooperation agreements							✓							

22.2 Monitoring

Table 22-3 Monitoring commitments

TOPIC	MONITORING COMMITMENT
Commercial Fisheries	Monitoring will be undertaken by the Project to assess the impacts on demersal trawlers in line with the Monitoring Guidance (awaiting publication). A detailed monitoring programme will be developed through consultation with stakeholders in line with the recommendations made within the ScotMER Fish and Fisheries evidence map. Details of the proposed monitoring programme will be developed post-consent.

22.3 References

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