Future Framework Policy Statement

A SUBMISSION FROM REPRESENTATIVE ORGANISATIONS OF IRELAND'S SEAFOOD INDUSTRY

February 2024

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A Submission

from the Representative Organisations of Ireland's Seafood Industry

to the

Minister for the Environment, Climate, and Communications,

On the

Draft Offshore Renewable Energy Future Framework Policy Statement

Future Framework consultation

Offshore Environment and Future Development

Department of the Environment, Climate and Communications

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Background

In January 2024, the Department of Environment, Climate, and Communications, published its draft *Offshore Renewable Energy Future Framework Policy Statement*. This sets ambitious targets for the delivery of Offshore Renewable Energy (ORE) in Ireland's exclusive economic zone: 20GW by 2040; and at least 37 GW in total by 2050.

The Seafood Industry recognise and accepts the imperative of developing offshore renewable energy at an appropriate scale as humanity races to address the threat of climate change. The Industry is also acutely aware that fishermen are amongst those most likely to be adversely impacted by the development of offshore renewable energy. Against this backdrop and mindful of the additional need to meet EU targets for Marine Protected Areas and any potential *in-combination* impacts to sea fisheries or aquaculture, the Seafood Industry is committed to working with the State and competent state agencies to:

1. Deliver high-quality information and data on our seas and on the maritime environment, including data of a technical, economic, social, and environmental nature, that will inform how Ireland can *sustainably* deliver our ORE potential and provide a balanced and publicly available assessment of that information.
2. Develop appropriate tools and methods to ensure that the overall scale and location of offshore renewable energy is appropriately balanced between economic, environmental, and social constraints. Best practice techniques include Multiple-criteria decision-making (MCDM) or multiple-criteria decision analysis (MCDA)
3. Find an appropriate balance between the future needs of energy security and food security.
   According to the latest European Commission figures, average seafood consumption in Europe (EU) is 24.4 kg per person per annum. In 2024 Ireland's seafood industry, with quotas of 177,313 tonnes and 43,000 tonnes of farmed seafood, has sufficient resources (assuming a 50% yield) to meet the demands of some 4.7 million people. In other words, Ireland is currently self-sufficient in nutrient rich seafood, which, according to a recent BIM analysis, has one of the lowest carbon footprints of any produce in Ireland. To put this is perspective, in 2020 the EU_{27} *imported* over 6 million tonnes of fish just to meet domestic demand. If the Government is to prioritise energy over food production, then it is important that this position is justified, especially if this policy also leads to seafood-based employment and income losses in coastal communities.
4. Develop, where possible, synergies, coexistence strategies, and suitable ways to avoid, minimise, or mitigate the impacts of ORE development on the seafood industry.
5. Assess and predict potential adverse social and environmental impacts of ORE on the seafood industry. (A review of socioeconomic and sociocultural indicators for assessing the impacts of

offshore renewable energy on fishery participants and fishing communities can be found in Willis-Norton et al[1].

6. Provide, community-based leadership in the areas of conservation, public awareness, and education, thereby contributing towards local understanding, acceptance, and delivery of offshore renewable energy in the context of a plan led approach, in particular where the State is proposing the plan. This depends on the State proactively engaging with the Seafood Industry as set out herein.
7. Optimise the potential for developing offshore aquaculture in tandem with offshore renewable energy.
8. Identify how best to develop a long-term, sustainable skills and workforce pipeline that addresses the ongoing needs of both the seafood and ORE industries and not one to the detriment of the other.
9. Identify how best to develop a long-term plan for the rational use of the ports traditionally used by the Seafood Industry, in particular where ORE developments impact National Fishery Harbour Centres.
10. Ensure that the Community Benefit Funds established as part of the Future Framework are used to address adverse social and environmental impacts of ORE on the seafood industry and to maximise the economic benefit to local communities as well as the state. This includes ensuring that developer payments, currently *at least* €2 per MWh are, in future, linked to inflation, and, importantly, are not passed on to consumers.
11. Ensure that other funds, including EU structural funds and Production and Market Planning (PMP) funds are used to support the seafood industry during the transition to Offshore Renewable Energy and coincidental expansion of our MPA network. This includes funds to provide *inter alia* community-based leadership contributing towards local understanding, acceptance, and delivery of offshore renewable energy in the context of a plan led approach.
12. Ensure that funds are made available to address ORE development impacts that directly or indirectly affect the balance between fleet capacity and fishing opportunities.

[1] Willis-Norton *et al*, A synthesis of socioeconomic and sociocultural indicators for assessing the impacts of offshore renewable energy on fishery participants and fishing communities, Marine Policy 161 (2024).

1(a) Has this section adequately identified the general key priorities for ORE delivery in Ireland? Are there additional priorities that should be integrated into the holistic, plan-led approach?

Response:

Section 1 of the Draft Offshore Renewable Energy Future Framework Policy Statement identifies eight key priorities that will remain at the centre of the Future Framework:

i. Environmental concerns.
ii. Public and stakeholder consultation.
iii. Return to the State and local communities (including "to maximise associated **economic** benefits to the State and to relevant local communities").
iv. Cost competitiveness (including "to promote **economic returns** to the State and local communities associated with the development of ORE")
v. Delivery of targets.
vi. Availability of relevant data.
vii. Technology and Supply Chain Development.
viii. Industrial alignment including infrastructure, port facilities.

Question 1(a) asks whether the key priorities for ORE delivery are adequately identified. The Irish Seafood Industry Representatives have identified the absence of any priority clearly identifying the need for a systematic Economic and Socio Impact Assessment (ESIA) as a major omission from this list. Its non-appearance here, and more generally from Irish planning legislation, appears at odds with the wider concept of sustainable development, as defined in the United Nations *Brundtland* report[2], which emphasises the need to find a balance between economic development, environmental protection, and social well-being. The first of these, environmental protection, is centre stage as Priority 1 in the Future Framework Policy. Economic considerations too are prominent and are referenced in two priorities (iii) and (iv). Social wellbeing however is not included anywhere in the list of topics and the term *social* appears only once in the entire section, in priority (vi), and then *only* in the context of data collection. And yet the wording of priority (vi) clearly states that "*access to high-quality information and data on our seas and on the maritime environment, including data of a technical, economic, social and environmental nature, will help inform how Ireland can* sustainably *deliver our ORE potential".* In other words, there is a recognition that the '*sustainably deliver of Ireland's ORE potential'* depends on '*access to high-quality social information'*. But nowhere is there a clear priority given to the need to undertake a balanced and publicly available assessment of that information.

This also appears to be at odds with the terms of reference of the **Offshore Wind Delivery Taskforce** which clearly specify that the Taskforce should 'ensure that *the potential economic and societal benefits from establishing the offshore wind industry are maximised (ports/supply chain/jobs)'*. It comes as a surprise,

[2] United Nations, World Commission on Environment and Development, *Brundtland* report *Our Common Future.*

therefore, that the AFRY/BVG consultant's report accompanying the Future Framework Policy Statement considers only the positive benefits coming from ORE but fails to consider the socio-economic impact that ORE development will have on the seafood industry[3].

Note: The socio-economic[4] impact assessment identified in this section, is an assessment that:

i. Itemizes and describes any identified social or economic impacts that a project will have, makes predictions in terms of their probability, and assesses their significance. The assessment should give particular attention to adverse impacts on people's livelihood through, for example, displacement, disruption, or access restrictions. It should also consider potential social impacts including cultural and heritage impacts, as well as impacts on peripheral coastal communities.

ii. Considers both the risk of direct impacts and also indirect impacts such as inadvertent knock-on effects or cumulative effects that materialise through interaction with other developments (for example, marine protected areas, MPAs), impacts occurring at the project site or within the project's wider area of influence and impacts triggered over time.

iii. The data collection methods, analytical tools used, and depth of analysis conducted should be commensurate with the type and significance of the impacts identified. It should allow rigorous assessment of the significant impacts using qualitative and, to the extent possible, quantitative methods including detailed quantitative surveys and modelling.

iv. The impact assessment should describe the methods chosen for data collection and analysis and the rational for the choice of method; it should further describe the quality of available data and, where applicable, explain key data gaps and uncertainties associated with predictions.

v. Most importantly participatory research and assessment tools should be employed wherever sensible to increase stakeholder's understanding of the project, provide opportunity for raising issues and enable participation of affected groups in the identification of appropriate and meaningful mitigation measures.

1(f) What additional capacities and responsibilities should be held by industry in the context of the plan-led approach?

Response: From aquaculture, to fishing, processing, and a range of ancillary support industries, some 15,373 people were directly employed in the seafood sector in 2022[5]. When families and other societal dependants are

[3] This was conformed at the Information session convened by DECC on Tuesday 13 February 2024

[4] As a concept Economic and Social Impact Assessment (ESIA) can trace a legal basis as far back as 1969/1970 when the US National Environment Policy Act (NEPA) introduced a requirement to ensure that major federal actions significantly affecting the quality of the human environment were incorporated into a *balanced and publicly available assessment* of the likely impact of such actions. The inquiry into the proposed Mackenzie Valley gas pipeline from Yukon Territory to Alberta (1974-1978) was the first major case which was overturned for social reasons, due to a failure to consider the impacts on a local tribe. Since then, SIA has been progressively introduced to many countries around the world. The International Union for the Conservation of Nature, for example, advocates the use of ESIA (Environmental and Social Impact Assessment) "*to assess and predict potential adverse social and environmental impacts and to develop suitable mitigation measures".*

[5] BIM, Business of Seafood, 2022

accounted for this number is many times greater. Given its pivotal role in these coastal communities, the work of seafood representative organisations in the areas of conservation, public awareness and education is of huge and, too often, underappreciated value. The work of these organisations[6] can make an essential contribution towards local understanding, acceptance, and delivery of offshore renewable energy in the context of a plan led approach, in particular where the State is proposing the plan.

Given the reality that 'a coming together' cannot always be transformed into a positive co-existence or a synergistic use of the marine space, it is imperative the representative organisations are consulted, participate, and are engaged on an effective basis at all stages in the ORE planning cycle.

To realise this role however, it is essential that seafood representative organisations are empowered and appropriately funded for the task ahead. Importantly, it is not sufficient to consider *just* the capacities and responsibilities of the Offshore Renewable industry. Recognising that one industry, seafood, is being asked to move aside to facilitate another emerging industry, ORE, it is self-evident that the success of Ireland's future ORE development depends on collaboration across both industries and between government and industry. This is not adequately reflected in the Future Framework Policy Statement.

Last December the Minister for Environment, Climate and Communications announced a €1.1 million boost in funding for Irish environmental non-government organisations specifically to aid them in engaging with the rollout of offshore wind. The NGOs targeted for the funding include the IWDG, Coastwatch, Bat Conservation Ireland and *Birdwatch Ireland*; all of whom are considered to work in the conservation of species and habitats which may be vulnerable to ORE development. The Minister went on to note that "*this funding will help to ensure that development for offshore wind takes place in a manner that is sustainable and consistent with environmental protection, including protection of biodiversity, and the conservation objectives of protected sites, species or habitats*."

As DECC takes on the role of primary driver of Government policy in this area, it must recognise that this role must embrace not just environmental considerations but – in line with UN thinking on sustainable development – socio economic considerations also. The seafood industry has a pivotal role to play in this regard. Yet, to date, the State has failed to provide any equivalent funding for Seafood Industry representative groups to engage with the rollout of offshore wind despite the fact that they represent one of the principal groups in society likely to be directly and adversely impacted by ORE developments. This seems not just unfair but, potentially, at odds with the Aarhus Convention and its desire '*to promote environmental education to further the understanding of the environment and sustainable development and to encourage widespread public awareness of, and participation in, decisions affecting the environment and sustainable development'.* This need to be addressed as a matter of urgency.

[6] Seafood representative organisations include producer organisations (IFPO, KFO, NIFA, IS&E FPO, IS&W FPO), the fish processors and exporters association (IFPEA), IFA Aquaculture, the national and regional inshore fisheries fora (NIFF, RIFF).

1(g) How can Government facilitate a more comprehensive and streamlined engagement process with developers to ensure national ORE targets are delivered?

Response:

The Seafood Industry again notes that it is not sufficient to consider *just* the capacities and responsibilities of the Offshore Renewable industry when looking to ensure national ORE targets are delivered.

A consistent theme of this submission is the sense of alienation felt by the seafood sector when it comes to the development of offshore renewables. Developer-led Phase 1 projects have, almost without exception, failed to engage in any meaningful way with the representative seafood organisations, to their detriment. This is especially true when it comes to site selection and design, impact assessment, and mitigation planning. Rather than a cooperative engagement that provides fishermen with a clear understanding of how these things have been done and with the shared aim of promoting synergies and co-existence, on the contrary the entire process has lacked transparency.

For the enduring regime, as set out in the Future Framework Policy, it is vital that the various Government Departments involved, especially DECC, address the issue of a *truly* comprehensive engagement head on.

- A positive development has been the establishment by DHLGH of the Seafood ORE Working Group (Chaired by Capt. McCabe) that has facilitated industry-to-industry discussions, and some progress has been made.
- Conversely, whereas in the past the Offshore Renewable Energy Development Planning process (OREDP I and II) facilitated state engagement directly with the seafood industry, since the publication of the draft OREDP II in 2023 no further meetings of the OREDP Advisory Group have taken place.

  The OREDP Advisory Group included, *inter alia*, Coastwatch Ireland, the Irish Environmental Network, the Irish Whale and Dolphin Group, Sustainable Water Network (SWAN Ireland) along with the Killybegs Fishermen's Organisation, the Irish South and East Fish Producers Organisation, the Irish South and West Fish Producers Organisation, the National and Regional Inshore Fisheries Forum, *and* the Marine Renewables Industry Association, the National Offshore Wind Association of Ireland, and Wind Energy Ireland. That this vital forum, involving economic, environmental, and societal considerations, is no longer meeting should be addressed as a matter of urgency.
- The Offshore Wind Delivery Taskforce, established to bring together senior representatives from key departments and agencies with responsibility for delivering offshore wind related actions under the Climate Action Plan, i) does not include DAFM (other than as an observer), ii) has only included the Marine Institute as a member since December 2023, and iii) does not include any representative of BIM, the agency responsible for gathering and analysing economic and social data for the seafood industry.
- While the Sea Fisheries Liaison Group (SFLG) of the Department of Agriculture, Food and Marine had provided a vital forum for seafood representatives to engage directly with the Minister and Department, this Group has not met in recent years, leaving the seafood industry without a clear pathway to meaningful discussions with government departments, policy makers and Ministers.

4(a) What structures, measures, and interventions can the State and State agencies implement to assist in the development of a long-term, sustainable skills and workforce pipeline? Provide any recommendations on what the State can do to promote careers in ORE across a range of educational backgrounds and movement from other relevant sectors.

Response:

Operated by BIM, the National Fisheries College of Ireland (currently based in Greencastle, County Donegal, and Castletownbere County Cork) has provided training to the seafood sector for more than 50 years in a range of disciplines including navigation, seamanship, engineering, safety etc. In addition, BIM collaborates with external organisations including the Irish Business and Employers Confederation (Ibec), offering continuous professional development (CPD) courses and with the South East Technological University (SETU).

If it is to be successfully deployed, at scale, then offshore renewable energy development must be seen by coastal communities to bring both new and additional employment opportunity for already trained fishermen, especially to young people essential to the ongoing viability of their communities. However, at a time when fishing has become less profitable, wages have fallen and crew have become ever harder to source, the possibility of ORE opportunities attracting skilled seafarers *away* from fishing is a very real threat. It is vital that the structures, measures, and interventions introduced to assist in the development of a long-term, sustainable skills and workforce pipeline for ORE complement rather than compete with fishing.

To that end it is imperative that DECC, as the Government department with primary responsibility in this area, engage (either directly or through the Department of Agriculture Food and the Marine or Department of Transport as appropriate) with BIM to identify how best to develop a long-term, sustainable skills and workforce pipeline that addresses the ongoing needs of both industries and not one to the detriment of the other.

4(c) To what extent should an emphasis be placed on multipurpose sites for ORE delivery, including the colocation of devices? What Government structures should be developed to encourage and facilitate progress in this aspect?

Response:

Consideration must be given at all stages of the planning process to enabling co-existence of ORE project footprints with other maritime activities including fishing, aquaculture, tourism, transport, energy generation including the potential for co-location with additional ORE, and other industrial activities. Co-existence approvals are complex, and efforts should be made to regulate such an approach in accordance with Marine Spatial Planning and DMAP procedures - with special reference to environmental concerns, socio economic impact assessments, preexisting mix of uses, displacement, personnel safety, reduction in efficiency or enhanced co-existence opportunities with other activities, and risk to infrastructure. Given that available designated maritime area is limited, the promotion of synergies and co-existence must aim to contribute to a positive benefit for all users in a mixed use coming together along with better defence and security methods.

Offshore Aquaculture:

With a growing human population and its ever-increasing demand for food as well as energy, it makes sense for the growth trajectories of the food and ORE sectors to be aligned rather than compete with one another. Aquaculture, located inside the spatial footprint of Wind Farms, is increasingly being seen as a promising means of boosting the productive output from the area set aside for windfarms, creating economic and socio-economic benefits, and reducing the spatial competition for marine resources. Results from various co-location trials carried out to date have been promising. The early conclusions being reported are that further technological development of the aquaculture processes is required to achieve the necessary scale at a reasonable cost, but the indications are that the fundamentals of the Aquaculture/Offshore Wind Multiple Use Scenario (MUS) proposition appear to be sound.

- In Ireland, the potential candidates for aquaculture co-location with floating offshore wind (FOW) are salmon farming, mussel farming or seaweed farming.
- The level of investment and hence financial risk, associated with seaweed aquaculture is much lower than required for a fin fish farm or for a bi-valve aquaculture operation and early indications are that seaweed aquaculture does offer a realistic option as a co-location candidate.
- The ecosystem services that arise from co-location indicate that a monetarization of all the services provided by large-scale seaweed and bivalve production, in a co-located setting with FOW, would add up to a '*true economic value*' far in excess of the value of the harvested products on their own.
- In socio-economic terms, the extra employment and extra activity associated with co-location broadens the appeal of any proposed development by offering potential benefits to a wider range of stakeholders. Steady suitable employment is still at a premium within Ireland's coastal communities and the skill sets needed for an aquaculture activity, such as seaweed farming are akin to fishing and thus widely available and compatible with local expectations.
- It is clear that there are substantial benefits to the co-location of aquaculture and that it would be wise to make provision for it in the planning of FOW. It is acknowledged that the concept is in its infancy and there is technical development work still to be carried out before it can become a large-scale reality. Notwithstanding, given the long lead time needed to bring an FOW development to fruition, the required aquaculture developments, which are in hand, could well be complete in time to dovetail with the deployment of the wind farms.
- The State should consider the option of making offshore aquaculture a part of the licensing regime of floating offshore wind, that is, ORE developments must also include or facilitate some degree of offshore aquaculture.

A note of caution.

- There are also possible downsides to offshore installations that must be considered. Large scale structure, whether fixed bottom or floating, may act as fish aggregating devices (FADs) and while that itself is not a problem, it can lead to changes in the local ecosystem the impacts of which are unknown. This might be the case too for significant bottom infrastructure (fixed bottom structures, anchors, chains, cables, offshore sub stations etc). Clearly this is a case where the precautionary approach (PA) correctly demands that development should

not be allowed to expand faster than the acquisition of information necessary to ensure that such development is sustainable and does not undermine the marine ecosystem.

- Large scale structure, whether fixed bottom or floating, will also likely impact the hydrography and geomorphology of the seabed in the vicinity of fixed bottom structures, anchors, chains, cables, offshore sub stations etc. This in turn could impact local populations of fish or shell fish.

Government structures must be put in place to:

- Optimise the potential for developing offshore aquaculture in tandem with offshore renewable energy.
- Prioritise scientific, technical, and economic support to investigate the potential of co-locating offshore aquaculture and ORE.
- Provide scientific, technical, and economic support to investigate the possibility of ecosystem impacts of co-locating offshore aquaculture and ORE.

2(b) In relation to National Security/Department of Defence interaction with ORE development, are there any issues you would like to highlight?

Given its size and location, recent events have highlighted Ireland's vulnerability when it comes to defending our exclusive economic zone. The possibility that significant offshore development will exacerbate that vulnerability must be considered in advance of any large-scale development.

ORE development sites must be managed appropriately to ensure the energy infrastructure itself is well protected from external activities while limiting repercussions to existing defence and security actions. For example, the large-scale deployment of ORE could have adverse impacts on air defence radars or at-sea patrols. Efforts must be made to protect Ireland's energy generation sites while maintaining the quality of existing responsibilities under the Department of Defence. From the seafood industry perspective, the following are essential issues that must be addressed:

- Will the presence of non-national security vessels have an impact on fishing port including competition for space?
- Could we find fishing vessels being put off traditional fishing grounds for security reasons (including possibly by NATO in the case of EU or UK waters)?

1(b) Has each key priority been adequately described and considered all relevant components? For each key priority please provide any additional concerns, aspects, or commentary for inclusion.

Response:

i. **Environmental concerns.**

Ensure that the possible environmental impacts of offshore installations are fully considered, baseline data collected, and monitoring programmes agreed and implemented in advance of any future development work. This must include *inter alia* the possibility that large scale structures, whether fixed bottom or floating, may:

- Act as fish aggregating devices (FADs) that could lead to changes in the local ecosystem the impacts of which are unknown. This might be the case too for significant bottom infrastructure (fixed bottom structures, anchors, chains, cables, offshore sub stations etc). Clearly this is a case where the precautionary approach (PA) correctly demands that development should not be allowed to expand faster than the acquisition of information necessary to ensure that such development is sustainable and does not undermine the marine ecosystem.
- Impact the hydrography and geomorphology of the seabed in the vicinity of fixed bottom structures, anchors, chains, cables, offshore sub stations etc and bring about changes to local populations of fish or shell fish.

ii. **Public and stakeholder consultation.**

For the enduring regime, as set out in the Future Framework Policy, it is vital that the various Government Departments involved, especially DECC, address the issue of a *truly* comprehensive stakeholder consultation head on. Consultation to date, especially in respect of Phase 1 developments, has been inadequate, piecemeal, or in some cases non-existent. Nor is there currently an adequate forum to facilitate proper and meaningful consultation between the Seafood Industry and the State services. While the DHLG established Seafood ORE Working Group has facilitated seafood - ORE *industry-to-industry* discussions and progress has been made, the same is not true for seafood industry - state interaction. For example, the Offshore Renewable Energy Development Planning (OREDP) process that had facilitated state engagement directly with the seafood industry, has not met since the publication of the draft OREDP II in 2023. That this vital forum, involving economic, environmental, and societal considerations, is no longer meeting should be addressed as a matter of urgency.

iii. **Return to the State and local communities.**

- ✓ Ensure that Community Benefit Funds established as part of the Future Framework are used to address any adverse social and environmental impacts of ORE on the seafood industry as well as maximising the economic benefit to local communities and the state.
- ✓ Ensure that developer payments, currently at least €2 per MWh are, in future, linked to inflation, and importantly not passed on to consumers.
- ✓ Ensure that other funds, including EU structural funds and Production and Market Planning (PMP) funds are used to support the seafood industry during the transition to Offshore Renewable Energy and coincidental

expansion of our MPA network. This includes funds to provide inter alia community-based leadership contributing towards local understanding, acceptance, and delivery of offshore renewable energy in the context of a plan led approach.

- ✓ Ensure that funds are made available to address ORE development impacts that directly or indirectly affect the balance between fleet capacity and fishing opportunities.

iv. **Cost competitiveness**

Ensure that any effort to promote the economic returns associated with the development of ORE solely to target energy exports in international markets, particularly in the UK and the EU, also considers in an open and transparent manner i) the socio-economic needs of the seafood industry and local communities dependent on it, and ii) the need to strike an appropriate balance with food security.

v. **Delivery of targets**.

- ✓ Engage directly with the Seafood Industry to provide community-based leadership in the areas of conservation, public awareness, and education, thereby contributing towards local understanding, acceptance, and delivery of offshore renewable energy in the context of a plan led approach, in particular where the State is proposing the plan.
- ✓ Engage directly with state agencies including BIM and the Marine Institute to find an appropriate balance between the future needs of energy and food security.

vi. **Availability of relevant data**.

Engage directly with the Seafood Industry to:

- ✓ Deliver high-quality information and data on our seas and on the maritime environment, including data of a technical, economic, social, and environmental nature, that will inform how Ireland can sustainably deliver our ORE potential and provide a balanced and publicly available assessment of that information.
- ✓ Develop appropriate tools and methods to ensure that the overall scale and location of offshore renewable energy is appropriately balanced between economic, environmental, and social constraints.
- ✓ Find an appropriate balance between the future needs of energy security and food security.

vii. Technology and Supply Chain Development.

It is imperative that DECC, as the Government department with primary responsibility in this area, engage (either directly or through the Department of Agriculture Food and the Marine as appropriate) with BIM to identify how best to develop a long-term, sustainable skills and workforce pipeline that addresses the ongoing needs of both industries and not one to the detriment of the other.

viii. **Industrial alignment including infrastructure, port facilities**.

Include the Seafood Industry directly in the development a long-term plan for the rational use of the ports traditionally used by the Seafood Industry, in particular where ORE developments impact National Fishery Harbour Centres.