

International and Offshore Energy Division,

14th June 2024

South Coast DMAP Submission,

Department of the Environment, Climate and Communications,

29-31 Adelaide Road, Dublin 2, D02 X285

Re: **Public Consultation on the South Coast Designated Maritime Area Plan for Offshore**

Renewable Energy (SC-DMAP)

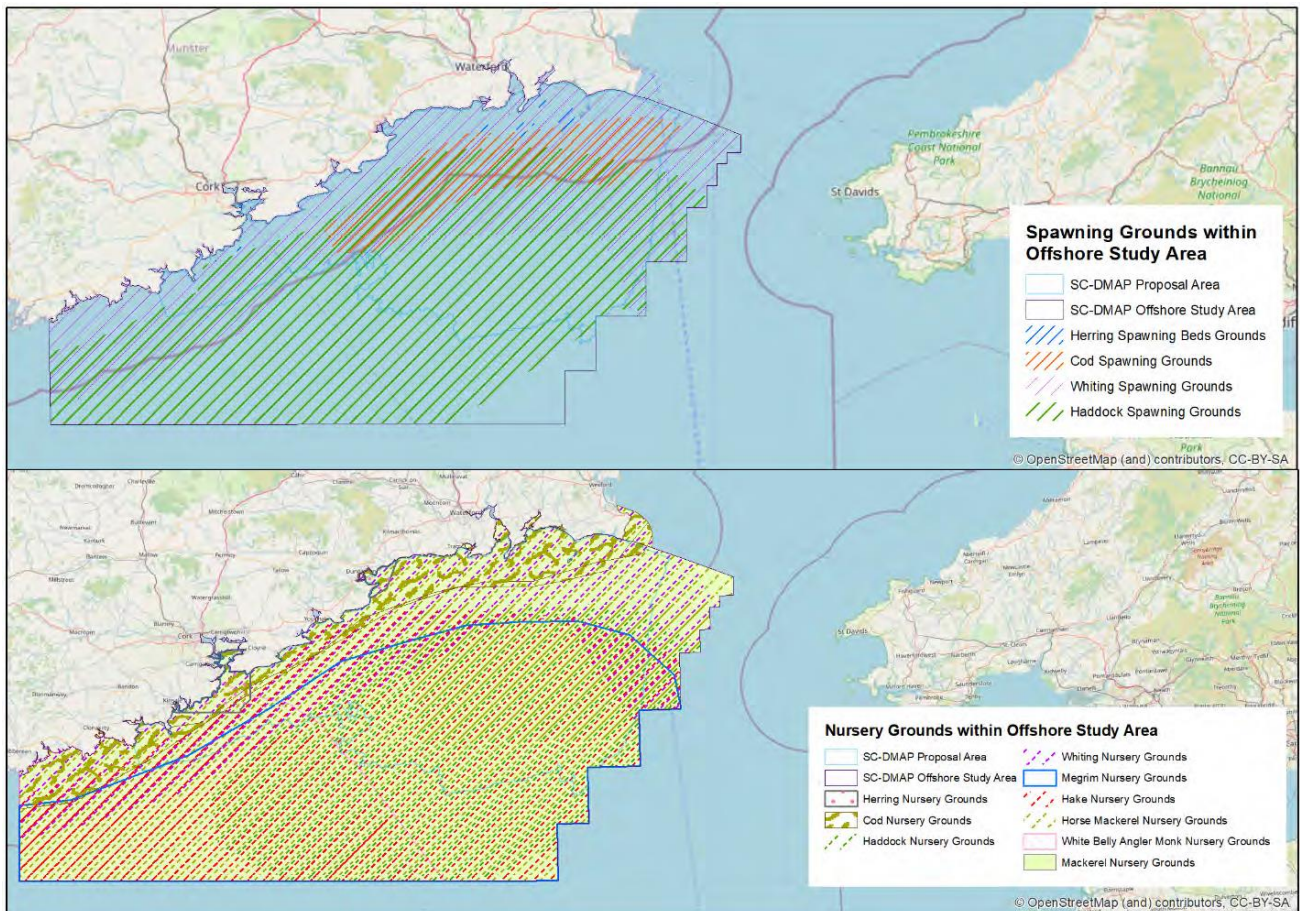
Submission of Ballycotton Fishermen's Association Limited.

We, **Ballycotton Fishermen's Association** wish to make the following Submission to the Department of Environment, Climate and Communications (DECC) regarding the draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy based on the supporting documentation made available on the Department's Website.

The chart set out on page 55 of the RPS SEA Report dated the 2nd May 2024, **Figure 5.8: Spawning and Nursery Grounds for Relevant Fish Species** that we reproduce below discloses just how critically important are these waters to the health of a myriad of Fish Stocks, many of which represent the very foundation stone of the working lives and livelihoods of the members of this Organization and all of which are of critical importance to, not only for Irish Fishermen and women, but also, for the very many Fishing Boats of other EU Nations, from Spain to France to Belgium to Netherlands to Germany to Denmark and the UK that are entirely dependent upon the continuing good health of these Stocks if they and we are to be able to continue fishing into the future.

If we Fishermen are to retain not only our own livelihoods through fishing the waters of the Celtic Sea but the lives and livelihoods of our own children and grandchildren and those of our neighbours and friends who may wish to follow in our footsteps and pursue a career in fishing in these waters, it is of critical importance that Celtic Sea Fish Stocks are permitted to spawn and be nursed to adulthood. We members of the Ballycotton Fishermen's Association Limited are extremely concerned that issues related to Spawning and Nursery Stocks do not appear to be of any great interest to those who aim to exploit these waters solely for purposes of construction of vast and extensive clusters of Wind Turbines founded upon Piles driven into the sea-floor for distances of up to 50 meters depending upon the underlying geology while being surrounded by a maze of cabling designed to connect these Pylons together once constructed and ship the Power Output to shore. Not alone will the presence of these Turbine Pylons grossly interfere with our abilities to earn a living by effectively stopping and preventing us from deploying our fishing nets, fishing lines and Crab & Lobster Pots but, there is ample evidence telling us that the very presence of connecting power cables on the sea-floor taken together with the

transmission cables shipping the power output to shore cause very significant electromagnetic emissions all of which cause both Fish and Shellfish Stocks to be displaced, oftentimes a very considerable distance of 10 to 20 nautical miles from where they've been traditionally found.



It is our understanding that some Shellfish Stocks that may be adversely impacted by either/both Seismic Surveys commissioned in support of the construction of the Offshore Wind Turbines and/or by the very significant acoustic impacts resulting from the pile-driving of the foundations of these Turbines and/or by the electromagnetic emissions coming from the power-lines that will cover much of the sea-floor are unable to scatter to the four winds to escape these adverse impacts. In this, we are particularly concerned by the adverse impacts upon not only Crab and Lobster but also, and specifically by the adverse impacts on the Scallop population. Scallops represent a very significant portion of the livelihoods of Irish Fishing boats all along this coastline and we believe that the Celtic Sea-bottom is where the vast majority of the Irish Scallops live out their lives. It is our understanding that Scallops are singularly incapable of escape from the adverse acoustic impacts emitted during seismic surveys, during pile-driving and during Turbine operations, if and when any are actually constructed while we also understand and so believe that the Electromagnetic fields surrounding the sub-sea connective and Transmission Cables are likely to cause death and a collapse in the Scallop population. We also believe that Prawns may be similarly adversely impacted and what worries us most about the content of the published documentation is the absence of any reference whatever to the impacts of Seismic Surveys,

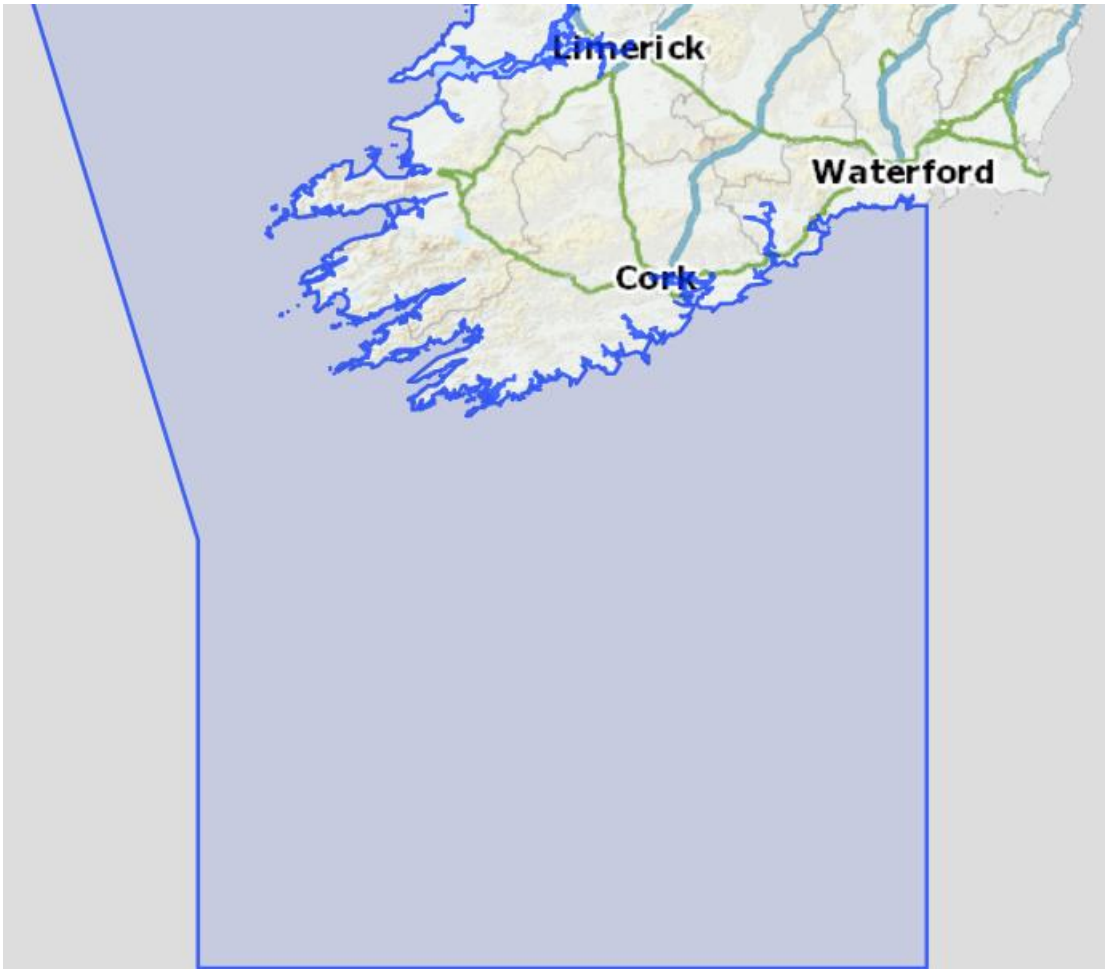
the impacts of the construction of foundations and construction of these truly gigantic Turbines on both Fish and Shellfish populations and the very significant impacts suffered by Shellfish populations during Operations in the event that any survive the construction phase.

We believe that the interests of Fishing communities all along the coast of Cork, Waterford and Wexford are being ignored in the pursuit of designation of these Waters for purposes of construction and operation of an enormous number of Turbines while the possible and probable adverse impacts to both fish and shellfish populations, particularly the highly sensitive Spawning and Nursery Grounds and Habitats of both Scallops and Prawns.

Any damage to any of the species listed on the chart we have exhibited above or to Shellfish will result in devastating impacts to Fishing Communities all along this coastline and we in the **Ballycotton Fishermen's Association Limited** respectfully request that NO designation of these waters be proceeded with until such time as a full and comprehensive audit of all Scientific Studies on the issues we have raised above is conducted.

Finally, we ask you to note that in 2003 the EU Commission established a Biologically Sensitive Area (BSA) off the south and west coast of Ireland with the Area designated as a protected site for fishing effort monitoring. The Biologically Sensitive Area has been created by the European Council Directive and the Area is 100% designated a protected site for biological sensitivity.

URL: http://atlas.marine.ie/midata/ProtectedSites/Biologically_Sensitive_Area.shapezip.zip



We ask that you note our position.

Yours faithfully

Ballycotton Fishermen's Association Limited.

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Ballycotton

County Cork

Director