The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: Draft Offshore Renewable Energy Action Plan

Submitted 15th March 2023

NIMTF wants to thank the Department of Economy for this opportunity to comment on the 'offshore renewable energy action plan.'

We recognize that this is an exciting time for renewable energy development within Northern Ireland and the Offshore Renewable Energy Action Plan (OREAP) will support NI in meeting global and national climate targets, such as those laid out in the NI Climate Act[1]. This transition towards renewables will also exhibit NI as a nation leading in the expansion of sustainable energy within the UK and beyond.

However, it must be acknowledged that we are experiencing a twin climate and nature crisis. These two challenges are inherently linked, with failure to act on one exacerbating the decline of the other. Therefore, NIMTF strongly advocates for the application of a strategic approach that will integrate offshore wind development with the restoration of the NI marine environment. In doing so, we will succeed in combatting climate change whilst also supporting the recovery of local marine biodiversity. We believe this should be acknowledged and championed within this OREAP.

Additionally, in considering marine restoration, the offshore renewables industry in NI will have the opportunity to lead as a global example of windfarm deployment that works in tandem with nature, allowing biodiversity to thrive whilst ensuring NI reaches its net zero energy target by 2030.

Outlined below are general comments from NIMTF on the direction of this OREAP:

- It is positive to see reference to development that '*Supports a whole system approach*' and is *'sited in most sustainable and cost-effective locations'* throughout this action plan. However, it is necessary that the term 'sustainable' be defined. This term can be interpreted as either environmentally sustainable or economically sustainable, with the latter potentially having detrimental impacts for the marine environment. Additionally, we appreciate that all development will need to be cost-effective but it is vital that more economically viable site selection is not prioritized above site selection that is environmentally sustainable. To be truly sustainable, all development at sea must follow the mitigation hierarchy of 'avoid,

[1] https://www.legislation.gov.uk/nia/2022/31/contents/enacted

minimise, restore, offset', with preference given to avoiding any harm to wildlife in the first place and offsetting and compensation only used as a last resort.

Furthermore, there is a notable mention of 'growth' and 'expansion' throughout this action plan for both offshore wind capacity, industry and our economy. These proposals are promoted alongside the overall vision of *'innovation in the green economy*' and '*sustainable development in the marine environment'*. Nature is in crisis, and it is therefore paramount that equal attention is given to the recovery and protection of local species and marine habitats alongside development and industry growth at sea. Only then will we achieve productive, resilient and healthy seas, which in turn will result in a more resilient climate alongside societal and economic benefits for NI.

- NIMTF are concerned about the primacy of *'identifying barriers to accelerating offshore wind deployment'*. We appreciate the urgent need for renewable energy deployment and recognize that environmental considerations, processes and recommendations can be time-consuming. As we are in a twin biodiversity and climate crisis it is counter-intuitive to mitigate against climate change whilst potentially furthering the decline of biodiversity. Offshore renewable expansion in NI can provide a once in a life time opportunity to implement effective planning and deployment at sea were environmental considerations are an integral part of the process. To succeed, it will be necessary that all environmental assessments are rigorous, robust and recommendations are not sacrificed for the need to hasten development.

- The introduction of this OREAP outlines the origin of this plan, referencing the department of Economy's 'Energy Action Plan 2022', specifically Action 14, to '*Develop an action plan to deliver 1GW of offshore wind from 2030*'. However, the indicative timeline within this OREAP document only outlines processes to 2030. It is essential that this action plan has a long-term vision. The immediate impacts of renewable development within the marine environment may not be evident for some time, and deployment may need to be adapted as knowledge on species and habitat interactions increase. We acknowledge that through the OREAP Steering Group this action plan '*can be considered a 'living' document*'. This is key if it is to be an adaptable document, applied and evaluated to 2030 and beyond to adjust to wider interactions within the marine environment.

- It is promising to see detailed reference to commitments outlined in the NI Climate Change Act throughout the OREAP, however several other pieces of legislation and strategies currently being developed must also be considered in this OREAP. This includes NI Biodiversity Strategy, The MPA Strategy Review, NI Seabird Conservation Strategy, NI Elasmobranch Strategy and NI Blue Carbon Action Plan. This reinforces the above point that this OREAP must be a working document that will incorporate commitments and targets from new policies and strategies alongside those outlined in the NI Climate Change Act.

Question 1: Do you agree with the principles of the Offshore Renewable Energy Action Plan? Yes/No Please provide any further comments and, if possible, evidence to support your answer, additional comments or suggestions.

1. **Principle One: Sustainable development in the marine environment:**

It is promising to see sustainable development outlined as a key principle of this OREAP. The planning and development of offshore wind of this scale will be the first of its kind in NI waters, creating a unique opportunity to deliver development in tandem with nature.

To achieve this, a holistic approach, in which offshore renewables are not developed in isolation of other marine functions and activities, is essential. Therefore, all future development will only be sustainable if it implements an ecosystem based approach, considering the wider effects deployment and construction will have on all aspects of the marine environment, and that assessment of impacts includes a cumulative approach considering combined effects of wider developments in the area.

We therefore recommend the title of this principle be:

Sustainable development that applies an ecosystem based approach within the marine environment.

There are challenges needing consideration in the OREAP in order to achieve truly sustainable development at sea.

- To successfully implement this principle a detailed, spatial understanding of NI marine habitats and species, alongside marine stakeholder usage, will be key. However, this OREAP must take into consideration that NI does not yet have a spatially explicit Marine Plan. Without this resource, it will be difficult for renewable energy projects in NI waters to guarantee they are developed within sustainable limits.

- Additionally, any offshore renewable energy projects cannot claim to be fully sustainable when there are still significant evidence gaps relating to the development of windfarms on a variety of marine species & habitats. In-depth and long- term monitoring will be required to address these knowledge gaps.

- When addressing sustainability, it is also important to recognize that environmental conditions, species, habitats and requirements will vary through space (i.e. site selection) and time (i.e. a changing climate), so each HRA and SEA must be site-specific, and a mechanism for reviewing impacts over decadal scales included in project monitoring plans.

- When quantifying sustainable development, it is crucial that long-term, cumulative developments and their associated impacts across the NI region are considered. With the intention to expand multiple arrays, developers and the relevant governmental departments, must undertake impact and vulnerability assessments that identify the cumulative impacts of multiple offshore developments within NI's marine environment, not just that of a single windfarm. This should be undertaken in the early stages of development. Only then will the renewable industry be enacting true, sustainable development at sea.

To guarantee sustainable offshore wind development within the marine environment, this OREAP will need to apply the mitigation hierarchy prior to the selection of strategic compensation, ensuring an aim of no net loss of biodiversity is prioritised within the planning process. How this will be actioned on a project-by-project basis will require eNGOs involvement.

2. **Principle Two: Adaptive Approach**.

NIMTF welcomes the *Adaptive Approach* as a principle of OREAP, acknowledging adjustments to this process must be made when the health of the marine environment is at risk or as 'new data and insights become available'. To truly benefit the marine environment NIMTF would advocate that any adaptations occur under a robust process, enabling development to proceed, yet with safeguards in place to monitor new mitigation measures and continue to adapt as necessary.

It is important to outline that under this principle there is a need for long-term monitoring and research. Without continuous monitoring pressures from cumulative developments, the associated environmental impacts may go undetected, with no appropriate adaptation and mitigation measures being sought.

It will also be key that this OREAP clearly outlines what quality and type of 'new information' would be adequate to require an adaptive approach to be undertaken.

In addition to this, the department must acknowledge that many strategies the OREAP will be required to align with are still in development, such as the NI Biodiversity Strategy, The MPA Strategy, The NI Blue Carbon Action Plan, The NI Seabird Conservation Strategy and The NI Elasmobranch Strategy. A clear process must be outlined for which the OREAP considers and incorporates the aims of each of these strategies into this action plan.

3. **Principle Three: Collaboration and partnership**.

Collaboration and partnership is a key aspect of making the OREAP a success in NI. NIMTF are delighted to be involved in this process, appreciate engagement through the OREF, and welcome the update that the OREF will remain in place once the OREAP is adopted, as NIMTF wish to continue engagement with industry in the long-term.

In our current OREF capacity, eNGO's are informed of the ongoing higher-level processes of offshore development but it is now vital that eNGO's are brought in to specific decision-making processes. NI eNGO's have a wealth of experience relating to the local marine environment, including species-specific requirements, vulnerabilities to various pressures and potential aspects of offshore wind development. This is evident in the RSPB's '*Powering Healthy Seas'* report[2]. Local eNGO expertise will therefore be an invaluable form of support throughout the development phase of offshore renewables in NI seas, specifically relating to (data sharing, engagement with consultants undertaking environmental assessments and the scoping process for sustainable sites for development. This input should be drawn upon and could be facilitated through representation on working groups, such as '*Planning, licensing & consenting'*. Some NIMTF members, such as RSPB NI, are a consultee in the planning process and therefore should already be actively engaged on this process. Greater engagement and increased transparency on this level would avoid a repeat of scenarios in the Republic of Ireland, when tender requests to scope out the Greater Coding Bank region where submitted and surveyed by interested developers. This resulted in the misidentification of seabed habitat type, which was in fact sandbank listed under Annex I of the EU Habitats Directive[3].

[2] https://www.rspb.org.uk/globalassets/downloads/pa-documents/powering-healthy-seas-report_rspb_august-2022.pdf
[3] https://iwt.ie/dodgy-dealings-under-the-sea/

To avoid similar scenarios in NI seas, we cannot continue to operate in silos within this process. The cross-sectoral, multidisciplinary collaboration between eNGOs and industry representatives is key in driving this action plan and achieving a wider, strategic change to how we deliver development in our marine environment.

Overall, when addressing all OREAP principles, the overarching principle of balancing the need to restore our marine environment, alongside addressing the climate crisis must be recognized. Without a thriving and resilient marine environment, the de-stabilization of our climate will only be intensified further, rendering this plan and the vision for clean energy through offshore renewables redundant. Therefore, this plan must recognize that to truly tackle the climate crisis, we must also tackle biodiversity loss.

Question 2: Do you agree with the key objectives and actions in relation to Theme 1: Sustainability and co-existence? Yes/No Please provide any further comments and, if possible, evidence to support your answer, additional comments or suggestions.

NIMTF are pleased to see sustainability and co-existence garnering attention throughout this plan. Many marine species that inhibit NI waters are declining in abundance. Globally, shark and skate populations have declined by 70% since 1970, with these trends apparent in our local seas[4][5]. Whilst nesting UK seabird populations have declined by 30% in the last 20 years[6], facing cumulative pressures from habitat loss, overfishing and recent outbreaks of avian flu. Further unsustainable development at sea has the potential to push these species over the brink.

Therefore, to truly achieve sustainability at sea offshore renewable development must:

- Apply an eco-system based approach to all stages of the planning process.
- Apply a mitigation hierarchy to the planning process.
- Prioritize site-selection for development that will result in minimal pressure on marine species and habitats.
- Avoid offshore windfarm development and construction within Marine Protected Areas (MPAs). MPAs have been designated to protect marine life and designed to function as a network; therefore, development in them is a no-go area.

It is therefore important that we see greater ambition and stronger messaging within this theme. As outlined within NIMTF member organization RSPB's *Powering Healthy Seas report*, this theme should advocate for 'An ambitious but pragmatic approach that places offshore renewable development firmly within the context of holistic marine management.'

Action specific comments:

Action 1)

We agree that updates to the 2012 SEA and HRA are needed, but it is vital that there is no lowering of environmental standards and protection in the updated SEA and HRA. We note that in regards to addressing environmental assessments '*Procure external consultants'* is being undertaken. NIMTF

[4] http://www.habitas.org.uk/priority/species.asp?item=40795
[5] https://www.nature.com/articles/s41586-020-03173-9
[6] https://jncc.gov.uk/our-work/smp-report-1986-2019/

would strongly advocate for complete transparency in this process, with regular updates on outcomes from said assessments provided to all in the OREF. NIMTF would again highlight the wealth of experience in the NI eNGO sector relating to the local marine environment. This expertise can be an invaluable form of support when undertaking SEA and HRA's.

To gather an accurate understanding of the potential environmental impacts from rapid development at sea, certain evidence gaps for NI species and habitats still need to be addressed. This includes, but is not limited to -

- Interactions for seabird and elasmobranch populations towards OFW developments.
- Seabed disturbance and the wider impacts on marine hydrodynamics.
- Wider species displacement.

NIMTF would advocate that any available funding provided by the Crown Estate or developers support research that would inform these knowledge gaps.

Additionally, to undertake reliable environmental impact assessments, a robust and strategic ecological evidence base informing where new offshore windfarms can be located will be essential. This will provide more certainty that all developments are situated in locations to cause as little harm as possible and enable effective mitigation.

It is also vital that ongoing SEA and HRA are not only performed on a site-by-site basis, but also take a strategic approach that accounts for wider expansion and cumulative impacts on marine biodiversity from several OFW developments. Any initial development, in the form of one or two wind farms, will not accurately indicate potential long-term impacts within our seas. To future proof the marine environment, NIMTF strongly advocate for impact and vulnerability assessments for species and habitats relating to long-term developments.

Action 2)

NIMTF also find it encouraging that Theme 1, Action 2 of the OREAP outlines the process DfE will undertake to ensure this action plan aligns with upcoming marine-related policy.

To guarantee the success of this action it is key details of this exact procedure, for example, who will oversee this process and how regularly it will be reviewed, are outlined to ensure the OREAP is consistently up to date with the myriad of policy expected over the coming year. It will also be important that the procedure for failing to align the OREAP be detailed. We would recommend an independent review of this action as an additional check and balance.

Question 3: Are there any other areas that require further attention? Yes/No If yes, please provide evidence to support additional comments or suggestions.

In line with the Kunming-Montreal Global Biodiversity Framework which states 'By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy

planet and delivering benefits essential for all people'[7] , the renewable industry must not only sustain the health of the marine environment, but also support its restoration.

To ensure the deployment of OFW development in NI is sustainable and puts the environment at the forefront of decision-making, a key objective under this theme should focus on operating within a marine net gain system[8]. This will guarantee all in-scope developments leave the environment in a better state than before, and thereby firmly embeds environmental improvement into the heart of infrastructure planning and delivery. Specific actions to achieve this include the implementation of a mitigation hierarchy and a strategic compensation system.

A mitigation hierarchy must always precede compensation and co-existence as options to achieve sustainability. This is a widely used tool that guides users towards a hierarchy of decisions to be abided by throughout the development process, ensuring mitigation options are considered first and foremost. This then limits as far as possible the negative impacts on biodiversity from development projects[9]. Details of a mitigation hierarchy must be decided upon and enacted prior to strategic compensation, ensuring 'no net loss of biodiversity' is a priority within the planning process. It is important that any enacted mitigation hierarchy be transparent and have eNGO input.

When applying a mitigation hierarchy, each development must outline clear, measurable, time bound targets that are ambitious yet achievable in order to address the associated impacts of OFW development on the marine environment. Only then will planning be transparent and will nature be truly accounted for within the overall process.

Below we have outlined aspects of OFW development and deployment that must be considered and have appropriate mitigation applied to lower the risks to marine biodiversity:

- **Mitigating the overall design of turbines,** for example consider blade color to alert seabirds to structures[12].
- **Mooring lines, anchor systems and cables,** including cabling to shore.
- **Underwater noise.**
- **Vessel Collision.**
- **Entanglement**.
- **Invasive species control.**

After all possible impacts for development have been accounted for and mitigated to the greatest degree, should strategic compensation be applied. In these specific instances, it is crucial that stakeholders are engaged, and collaboration with eNGOs is consistent to ensure appropriate levels of compensation for disturbance are achieved. Adequate funding to support compensation projects and monitor long-term success will be key when such compensation to be well executed. NIMTF would again advocate for available funding provided by developers through Strategic Compensation Funds and the Crown Estate to be directed towards this process.

All of the above actions under Theme 1 will require long-term monitoring to ensure success and truly contribute to sustainability in our seas.

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[7] https://prod.drupal.www.infra.cbd.int/sites/default/files/2022-12/221222-CBD-PressRelease-COP15-Final.pdf

[8] https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-the-principles-of-marine-net-gain/

[9] https://www.thebiodiversityconsultancy.com/our-work/our-expertise/strategy/mitigation-hierarchy/

Additionally, NIMTF want to note that the OREAP principle 'Adaptive Approach' is particularly relevant to this theme. If any aspect of development is at any time deemed unsustainable or to have negative environmental consequences, adaptation in relevant procedures will be necessary. Therefore, it is important that an adaptive management plan be outlined under this theme, ensuring the process is clearly understood by relevant stakeholders and planning procedures have the ability to change course if unknown threats to nature become apparent.

Question 4: Do you agree with the key objectives and actions in relation to Theme 2: Enabling Frameworks? Yes/No Please provide any further comments and, if possible, evidence to support your response, additional comments or suggestions.

Action 4.

NIMTF are pleased to see decommissioning considered within the OREAP, as this takes a long-term, strategic approach to offshore renewable development in NI.

Many of the pressures presented during decommissioning are similar to commissioning, including impacts such as seabed disturbance and noise pollution. Additionally, micro-plastics, heavy metals and other pollutants are mainly shed into the ocean by older cables and anchors. To prevent long-term pollution these pieces of equipment must be collected during the decommissioning of any OFW turbines[16].

Forward planning should also be applied to consider how developers and relevant governmental departments safely and sustainably dispose of decommissioned turbine equipment and materials to further protect the environment.

It is vital that environmental planning relating to decommissioning is enacted to ensure marine biodiversity is not adversely impacted during this stage of OFW development. NIMTF advocates that relevant eNGO's be consulted on during this process.

Action 5.

NIMTF find the language within action 5 concerning, specifically '*OFE projects are prioritized'* and '*progress applications expeditiously.'* We would strongly advocate the process of consenting, licensing and developing are not accelerated at the cost of environmental health. We appreciate that even minimal activities within the ocean will have a certain level of disturbance and therefore affect the environment. However, regarding renewables it is a cause for concern that policy is moving faster than research, especially for identifying adequate mitigation measures. To try to limit large-scale damage or disturbance on local marine life, any streamlining of licensing, consenting and planning process still requires robust, completed baseline data sets and quality environmental assessments. Policy should therefore outline a precautionary response whilst areas of research are ongoing. To assist this process it is vital that OFW developers and the Crown Estate are contributing to research that will close these knowledge gaps.

Action 8

Regarding leasing, sensors and other scientific data collecting equipment on turbines should be written in as condition of the lease itself, to assist monitoring efforts.

Question 5: Are there any other areas that require further attention? Yes/No If yes, please provide evidence to support any additional comments or suggestions

N/A

Question 6: Do you agree with the key objectives and actions in relation to Theme 3: Electricity Network? Yes/No Please provide any further comments and, if possible, evidence to support your response, additional comments or suggestions.

Action 10

We are again pleased to see the reference to long-term goals and future planning within this action under, *'Determine quantity of OFW capacity short, medium and long term'.* It is imperative that decisions on future OFW capacity in NI seas is balanced with environmental considerations. It will be necessary for developers and the Department of Economy to quantify what the likely limit of OFW development in NI can be, that still allows for offshore renewable that work in tandem with nature and allow for a flourishing marine environment. This is particularly crucial as the DAERA-led NI MPA Strategy Review is currently near completion and we advocate a presumption against offshore wind farm development (and associated infrastructure like cables) in MPAs.

Action 11

It is positive to see environmental considerations incorporated into the OREAP through the commissioning of updated SEA and HRA. Again, NIMTF would ask for increased transparency on this process, with detailed information on what environmental indicators will be considered within each assessment. Timing for this action is noted as 2022. If this action has already occurred, we would expect an update to ensure assessments have been robust. We would expect to see impacts relating to the following stages of development considered:

- Turbines- size and quantity
- Construction
- Cabling and underground piping
- Increased boat traffic

When establishing a wider grid network, relevant working groups must also take into consideration both onshore and coastal development that will be required. The protection of habitats and species that occupy our coastlines is of equal importance to offshore subtidal sites, for example, shallower coastal sites may be a critical nursery ground habitat for some local elasmobranch species. This work will therefore also require EIA's to mitigate against environmental disturbance.

Question 7: Are there any other areas that require further attention? Yes/No If yes, please provide evidence to support any additional comments or suggestions.

N/A

Question 8: Do you agree with the key objectives and actions in relation to Theme 4: Economic Growth? Yes/No Please provide any further comments and, if possible, evidence to support your response, additional comments or suggestions.

Action 19:

We note the reference to Green Hydrogen within this action. We would advocate that any sites identified for the potential storage of green hydrogen be developed in a sustainable manner that is in keeping with achieving Good Environmental Status (GES) in our seas.

Question 9: Are there any other areas that require further attention? Yes/No If yes, please provide evidence to support any additional comments or suggestions.

NIMTF appreciate the economic opportunities that will present themselves alongside renewable industry expansion in NI, but it is vital to recognize that a sustainable economy can only thrive in a productive natural environment. Nature is in crisis, and it is therefore paramount that equal attention is given to the recovery and protection of local species and marine habitats as climate. There are opportunities to build habitat restoration-related industry and skills as well as those directly linked to offshore renewable developments. Both these elements should be prioritised above renewable industry economic growth. Only then will we achieve productive, resilient and healthy seas, which in turn will result in a more resilient climate alongside societal and economic benefits for NI.

It is therefore important to recognize the role renewable energy can play in a 'just nature transition'. A 'just nature transition' is a shift to a net zero and climate-resilient economy while simultaneously delivering biodiversity goals. To date, efforts to deliver a just transition to a net zero economy have focused on the energy system. However, the financial sector and profits created under actions within this theme can and should support positive outcomes for the just transition, focusing specifically on scaling up nature-based solutions and restoring ocean ecosystems.

Question 10: Do you agree with the key objectives and actions in relation to Theme 5: Legislation & Regulation? Yes/No Please provide any further comments and, if possible, evidence to support your response, additional comments or suggestions.

Again, NIMTF would note that it would be challenging to enable actions under this theme, such as sustainable deployment, as policy is currently moving faster than research in regards to offshore renewables. It is of the utmost importance that any streamlining of legislation and regulations must still ensure a robust, completed baseline data sets and quality environmental assessments are undertaken, with the precautionary principle applied to particularly vulnerable species and habitats and a mitigation hierarchy implemented during development.

Question 11: Are there any other areas that require further attention? Yes/No If yes, please provide evidence to support any additional comments or suggestions.

N/A

Question 12: Do you have any further comments on the Draft OREAP? Yes/No If yes, please provide evidence to support any additional comments or suggestions.

Further comments on monitoring & reporting:

NIMTF are pleased this OREAP acknowledges the need to monitor to ensure 'actions are being achieved'. Furthermore, we appreciate that all monitoring work and reporting is to be disclosed to the OREF. It is paramount that all monitoring is sustained over the long-term and monitors all potential impacts on marine biodiversity, as certain impacts may not be evident for some time and impact local species & habitats to different degrees depending on the stage of OFW deployment. Long-term monitoring will take all of this into account.

Briefings from NIMTF members, the Wildlife Trusts, have shown in England project by project monitoring is insufficient to determine the impacts from offshore wind on mobile species, particularly cumulative impacts. Therefore, we would ask for a strategic monitoring approach, which will be invaluable to understand the impact of offshore wind and if environmental measures are fit for purpose. We expect the new evidence will be gathered and shared in a transparent way and will feed into the planning of future offshore wind development.

NIMTF are again pleased to see the draft OREAP will be reviewed after SEA and HRA completion in 2024. We note this review will 'also consider monitoring for potential significant environmental effects'. We would strongly advocate that this is undertaken, and reiterate that the eNGO sector are available to support environmental assessments and provide mitigation recommendations.

Additional comments:

With this OREAP, it is of the utmost importance that nature's recovery is recognized and considered within all of the outlined themes. The health of our natural environment is crosscutting, with all other elements of development, from economic growth to the electricity of network at sea, heavily influenced and affected by the state of our seas. Therefore, the environment must be profiled throughout any OREAP.

We again highlight the opportunity this OREAP presents for Northern Ireland to lead the way on implementing offshore renewable energy that works in harmony with nature. The protection and restoration of our marine environment is vital for our own survival and with the ongoing failure to achieve Good Environmental Status (GES) in our seas, it is essential that we act now to achieve restoration locally. Renewable energy development plays a key role in this. We urge the Department for Economy to adopt a nature positive approach to this OREAP that will secure healthy, thriving seas vibrant with wildlife and in doing so will tackle the nature and climate emergency.

Finally, with a current lack of assembly in NI and no minister in place for legislative sign off, NIMTF would like to ask the department what considerations have been given to the next stage of this OREAP. We would appreciate transparency and any update on this process.