

14 June 2021

Response to UK Dolphin and Porpoise Conservation Strategy

Scottish Renewables

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland leading the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. The sectors we represent deliver investment, jobs, social benefits and reduce the carbon emissions which cause climate change. Our 300 members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world.

RenewableUK

RenewableUK's members are building our future energy system, powered by clean electricity. We bring them together to deliver that future faster; a future which is better for industry, billpayers, and the environment. We support over 400 member companies to ensure increasing amounts of renewable electricity are deployed across the UK and to access export markets all over the world. Our members are business leaders, technology innovators, and expert thinkers from right across industry.

Scottish Renewables and RenewableUK welcome this opportunity to comment on the UK Dolphin and Porpoise Strategy. We strongly support the creation of this Strategy and its ambition to join up a range of conservation themes affecting marine mammals.

The renewables industry is acutely aware that much of the expansion of offshore wind, expected over the coming decades, especially in the Southern North Sea, will coincide with existing SAC areas protecting dolphin and porpoise. Given the extent of the offshore wind ambitions of both the UK and Scottish Governments (ie. 40GW by 2030, and core pillar of a 2050 net zero economy), we suggest that reference in the Strategy is made to the central importance of achieving a positive outcome for biodiversity while delivering the net-zero energy infrastructure we need.

Our industry is engaged in extensive work at both a project and strategic level to better understand and mitigate impacts on marine mammals. As captured in the Action Plan, Sheet 4, this largely concerns underwater noise impacts from UXO removal and construction piling work. Through a range of initiatives, we are seeking to expand the knowledge and evidence base on acoustic science and working to inform a clearer regulatory framework for underwater noise across the UK nations.

Examples include the Offshore Renewables Joint Industry Programme (ORJIP) research programme covering Acoustic Deterrent Devices, piling noise and noise assessment data, and the Offshore Wind Evidence and Change Programme being led by The Crown Estate.

We continue to support research into the effectiveness of innovative noise abatement technologies, many of which are being deployed in current offshore wind project construction.

High levels of monitoring are required by consents, and the experiences from the current generation of offshore projects will be invaluable as the industry begins to develop the next generation of Round 4 and ScotWind leased sites. Consideration could be given as how this monitoring could be approached in a more strategic way to inform the evidence base on this topic.

While we support the formation of action working groups under this Strategy, it is important that existing stakeholder forums are not duplicated. For instance, there is no mention in Action Sheet 4 of the Strategic Advice Group on Underwater Noise recently convened by Defra, which is supporting a range of projects over 3 years. We recommend that the actions of that group are incorporated into this document.

We would also recommend that links are made with the Cumulative Effects Framework project, commissioned by Marine Scotland and run by the UK Centre for Ecology and Hydrology, who are developing best practice for cumulative effects assessment including for marine mammals.

Lastly, it is worth reinforcing the link between climate solutions and climate impacts. Reducing emissions from the energy sector is a major part of international efforts to slow the very serious impacts of ocean warming and acidification on cetaceans. The UK is the world's leading offshore wind market and can drive global decarbonisation by example. Our members want to see offshore wind playing a huge role in tackling both the threat to the climate and to biodiversity.

To discuss further, please contact Ben Miller, Senior Policy Manager, Scottish Renewables (bmiller@scottishrenewables.com), or Juliette Webb, Policy Analyst at Renewable UK (juliette.webb@renewableuk.com).