French answer to the consultation on round 3 UK wind farms proposal - 2009

A. IMPACTS' ASSESSMENTS

Impacts' assessments for the nine areas rated to the French fishing activities are based on VMS data analysed by IFREMER[1]. Fishing times on the sites are calculated for all French vessels with a length equal or greater than to 15 meters. Indeed, the vessels under 15 meters have no obligation for being monitored by a satellite surveillance system.
As a consequence this impact's assessment is not complete because it doesn't take into account the vessels under 15 meters. Now, vessels under 15 meters represent the most important part of the French fleet having an activity in the Channel and in the part of the North Sea closed to France. That's why we indicate for these areas the number of vessels which can be involved, although they don't appear in the different tables of results.
In order to identify vessels which are really fishing in the area, IFREMER has operated a selection on the speed. IFREMER has only kept in its analysis VMS signal corresponding to a speed under 4.5 knots, This choice where necessary but we have some concerns on this efficiency to identify all the gill-netters fishing in the area. The analysis seems not to be completely relevant for gill-netters. But the threshold of 4.5 knots also takes into account vessels which are not fishing but are waiting for better weather conditions (in bad conditions vessels are put on slow speed and put into the wind direction in order to stay until they have better meteorological conditions).

Nevertheless, this analyze has only been done in 2008, and it could be possible that some vessels have a different fishing activity depending on the year.

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[1] *Since January 2005, all fishing vessels with a length greater than or equal to 15 meters are monitored by satellite surveillance system. This system is a part of the regulatory framework of the Common Fisheries Policy established by the European Union; it applies to all vessels over 24 metres since 01/01/20001, to vessels over 18 m since 01/01/2004, and to vessels over 15 m since 01/01/2005. Vessels subject to this regulation are equipped with a tag called "blue box" recording the position of the ship and transmitting data with a temporal resolution of two hours (one hour in France) via the transmission systems of Inmarsat, Euteltracs, Argos, to the national reception station (In France, the Center of Fisheries Monitoring (CSP) is based at Etel). The control of the project is made by French administration.*

The data from the individual monitoring by satellite help to monitor continuously position at sea of fishing vessels each hour or two hours depending on the option accepted by the Member States.
(Translation of IFREMER's report)

The evaluation of the economic impact proposed by IFREMER is based on the sales registered in French auctions rooms per vessel and per year with the application of the percentage of fishing time estimated in the area. But it doesn't take into account if high value species are specifically caught in the sites. We can't estimate precisely the whole landings from those specific areas.

The economic impact could be higher if the profitability of the vessels affected decreases under a level which doesn't allow anymore the vessel to get benefits. Therefore if the vessel can't support the losses (even it represents less than 10% of the actual benefits), it could be obliged to stop its activity.

Moreover, the economic evaluation is only focused on the losses for the vessels and doesn't take into account the impact on the whole fishing industry.

B. THE SOCIO-ECONOMIC IMPACT

B.1. Moray Firth (area 1) and Firth of Forth (area 2)

No French vessel had a fishing activity in 2008 in these two areas. However, a fishing company informed us that three of its vessels (pelagic trawlers) may have had an activity in the past and may have one in the future.

B.2. Dogger Bank (area 3)

Only one French vessel had a limited activity in this area in 2008, but some others probably had one in the past and may have one in the future, depending on the resources of the area: 3 pelagic trawlers from Brittany and 5 bottom trawlers from the North of France.

For the one which had an activity in 2008, the benefits associated to the Dogger bank is about 3103 € (three hours in the area).

B.3. Hornsea (area 4)

The socio-economic impact of the area of Hornsea on the fishing activities is analyzed from VMS data of French vessels.

During the last year, 19 benthic trawlers, 10 vessels using both pelagic and benthic trawls and 1 vessel using purse seine have fished in the area.

The annual fishing time on the area of Hornsea varies from one vessel to another (from 2 hours to 226 hours). The average fishing time in 2008 in the area is 100 hours.

The average dependence on the area is calculated from hours spent in this one.

Table 1: Vessels ≥ 15 meters having a fishing activity on the area of Hornsea in 2008 (*from IFREMER*)

	Number	**Fishing time in the area (h)**	**Average dependence on the area (%)**
Bottom trawlers	19	1237	2.1
Pelagic and bottom trawlers (vessel using both gears)	10	822	2.77
Purse Seine	1	134	3.2
Total	30	3016	

The potential impact of a restriction on fishing activity must be estimated according to the vessel's dependence on this area. The area proposed represents between 0.1 % and 7.5 % of their fishing time. Moreover this area seems to be of importance for several vessels during specific periods although the global analysis of VMS data doesn't show it clearly.

However it seems that the activity of two of the three categories concerned (bottom trawlers and mixed trawlers) is distributed on the two extremities (west and east) of the area. The third one (netters) is fishing only on the east side of the area (see figures 1, 2 and 3). **It means that the exact localization of the wind farm project will be very influent on the social economic impact for the French fleet.**

The value of these landings is calculated from the percentage of the fishing time per year spent in the area applied to the sales per year (see Table 2) – based on IFREMER calculation. This method of calculation doesn't take into account the variation from one month to another. If a vessel has its activity focused on this area only for a few months during the year, the impact of a restriction could be much higher: i.e. a fishing firm could be destabilized if it doesn't earn a regular income during several consecutive months.

Table 2: Benefits associated to Hornsea for French vessels ≥ 15 meters in 2008 (*from IFREMER*)

	Number	**Average dependence on the area (%)**	**Total benefits (€) / losses for the fleet**	**Average benefits (€) / losses per vessel**
Bottom trawlers	19	2.1	341760	17987
Pelagic and bottom trawlers (vessel using both gears)	10	2.77	256405	25640
Purse Seine	1	3.2	48404	48404
Total	30		646569	

Even if these losses seem to represent a low value per vessel, some of these vessels are in fact small scale businesses. Therefore a small absolute loss could relatively endanger these firms.

B.4. Norfolk (area 5)

The socio-economic impact of the area of Norfolk on the fishing activities is analyzed from VMS data of French vessels.

During the last year, 10 benthic trawlers, 7 vessels using both pelagic and benthic trawls, 1 netter and 1 vessel using purse seine have been fishing in the area.

The annual fishing time on the area of Norfolk varies a lot from one vessel to another (from 2 hours to 111 hours) (see table 3). The average fishing time in 2008 in the area is about 20 hours.
In the same way the dependence of the vessels is very different from one to another. The area proposed represents between 0.1 % and 16.2 % of their fishing time: one vessel, a netter, will be particularly impacted by a project if this one takes place in the north-east part of the area (see figures 1, 2 and 3).

The figures also show the higher activity of the French vessels in the South of this area. Any modification of the limits of the area would affect their activity.

Table 3: Vessels ≥ 15 meters having a fishing activity on the area of Norfolk in 2008 (*from IFREMER*)

	Number	**Fishing time in the area (h)**	**Average dependence on the area (%)**
Bottom trawlers	10	123	0.4
Pelagic and bottom trawlers (vessel using both gears)	7	55	0.24
Netter	1	111	16.2
Purse Seine	1	102	2.4
Total	19	391	

Table 4: Benefits associated to Norfolk for French vessels≥ 15 meters in 2008 (*from IFREMER*)

	Number	**Average dependence on the area (%)**	**Total benefits (€) / losses for the fleet**	**Average benefits (€) / losses per vessel**
Bottom trawlers	10	0.4	26328	2633
Pelagic and bottom trawlers (vessel using both gears)	7	0.24	15984	2283
Netter	1	16.2	1633	1633
Purse Seine	1	2.4	36990	36990
Total	19		80935	

This amount could look like very low in absolute value but the example of the netter is relevant: the benefit only represents 1633 € but 16.2 % of the total turnover of the fishing society.

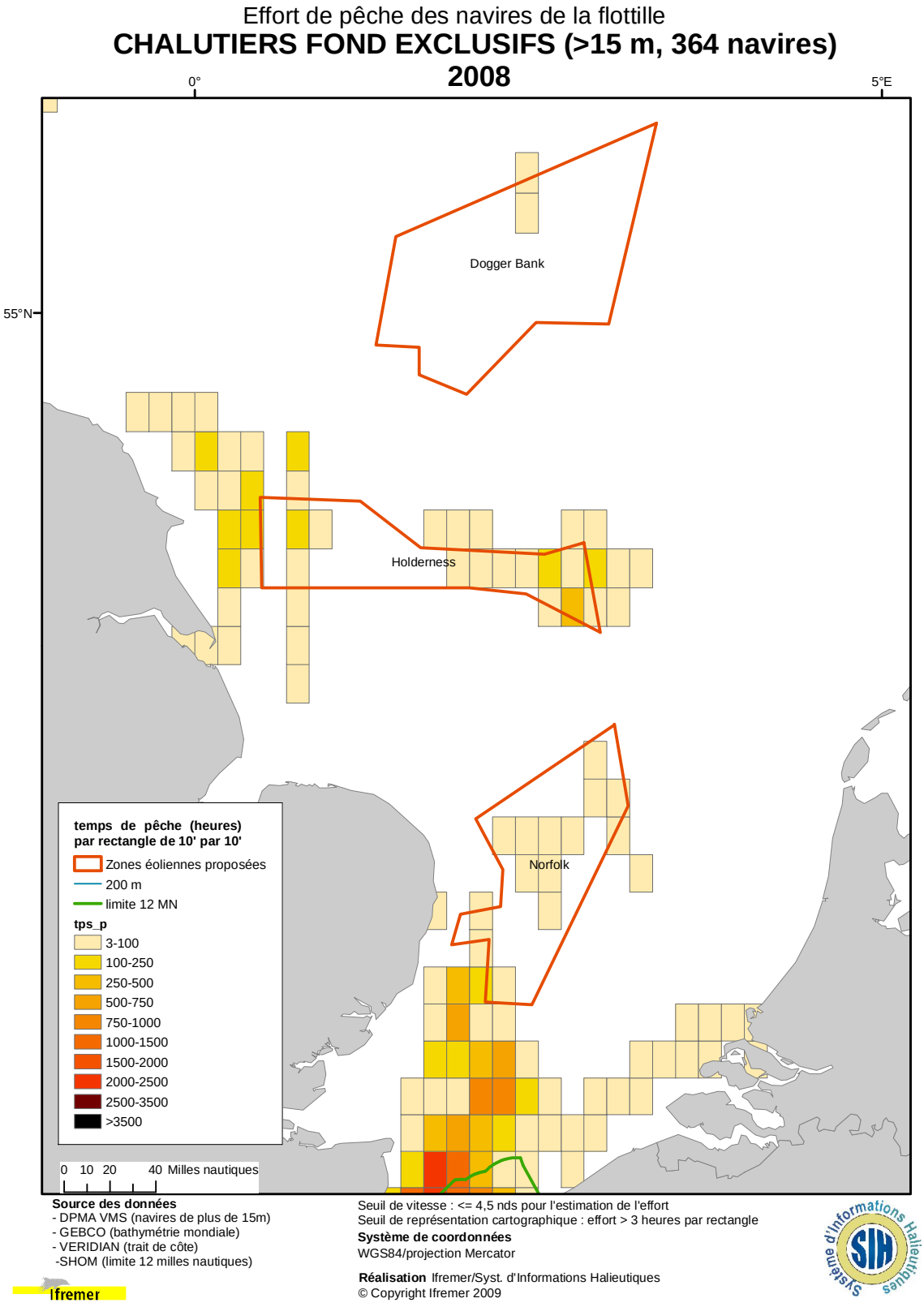

Figure 1 : Localization of the fishing effort of the bottom trawlers in the areas 3, 4 and 5 (Dogger bank, Hornsea and Norfolk)

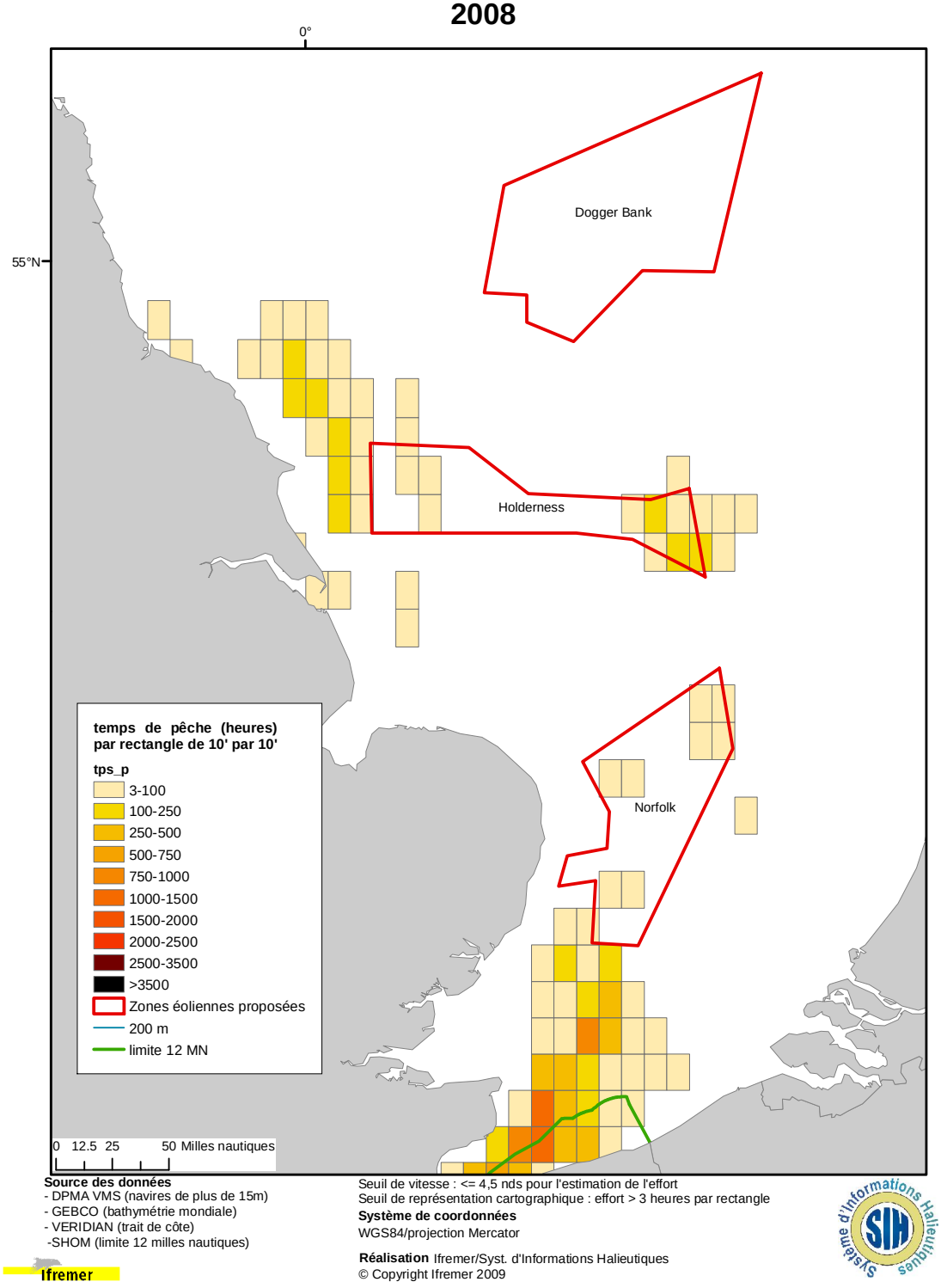

Figure 2 : Localization of the fishing effort of the combined trawlers (using both bottom and pelagic trawls) in the areas 3, 4 and 5 (Dogger bank, Hornsea and Norfolk)

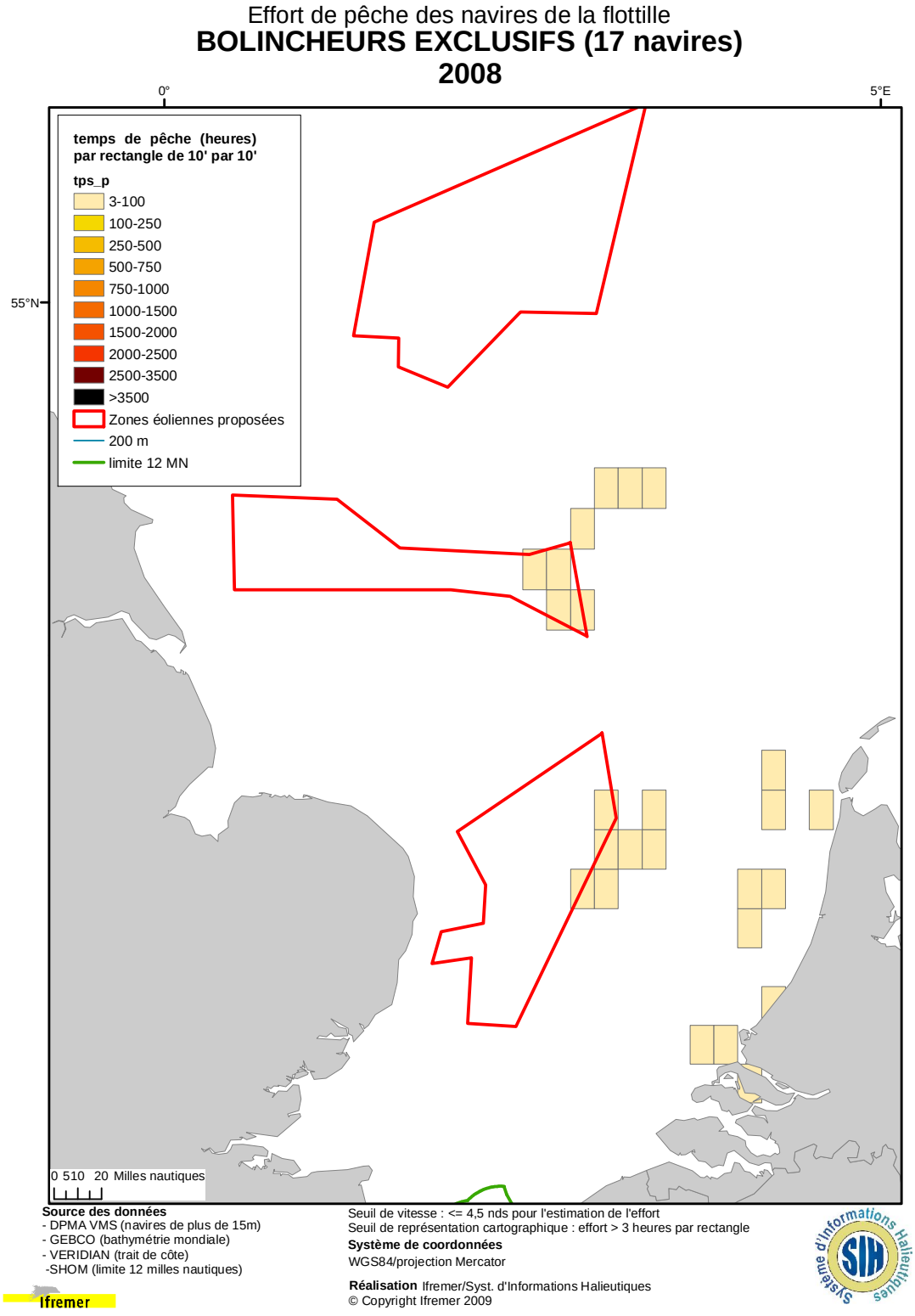

Figure 3 : Localization of the fishing effort of the vessel using purse seine in the areas 3, 4 and 5 (Dogger bank, Hornsea and Norfolk)

B.5. Hastings (Area 6)

French fleet has historical rights in the area between 6 and 12 nautical miles all along the South Brittany coast, for all species.
VMS data for French vessels show that fishing activity is more important in the South part of the proposed site (see figure 4, 5, 6 and 7).

During the last year, 12 bottom trawlers, 1 pelagic trawler, 12 vessels using both pelagic and benthic trawls and 1 dredger have been fishing in the area.

The annual fishing time on the area of Hastings varies a lot from one vessel to another (from 1 hour to 88 hours) (see table 5). The average fishing time in 2008 in the area is about 25 hours.

Table 5: Vessels ≥ 15 meters having a fishing activity on the area of Hastings in 2008 (*from IFREMER*)

	Number	**Fishing time in the area (h)**	**Average dependence on the area (%)**
Bottom trawlers	12	407	1.05
Pelagic trawlers	1	4	0.2
Pelagic and bottom trawlers (vessel using both gears)	12	259	0.6
Dredgers	2	3	0.05
Total	27	673	

The results above could seem low, but we have to keep in mind that the analysis only concerns vessels with length higher than 15 meters. And this area, as the following one (West Isle of Wight), is very closed from the French coast. That's why it could be an area with intense activity for French vessel with length under 15 meters.

The local professional organizations have been asked for the potential activity on this area. The result is 40 bottom trawlers and 20 gillnetters from the North of France are possibly involved in the area of Hastings.

Table 6: Benefits associated to Hastings for French vessels ≥ 15 meters in 2008 (*from IFREMER*)

	Number	**Average dependence on the area (%)**	**Total benefits (€) / losses for the fleet**	**Average benefits (€) / losses per vessel**
Bottom trawlers	12	1.05	97724	8143
Pelagic trawlers	1	0.2	808	808
Pelagic and bottom trawlers (vessel using both gears)	12	0.6	52870	4406
Dredgers	2	0.05	344	172
Total	27		151746	5620

There is no possibility to have an estimation of the benefits for vessels under 15 meters, which represents the most important fleet having an activity in the area.

B.6. West Isle of Wight (Area 7)

The socio-economic impact of the area of West Isle of Wight is evaluated according to the same methods used for the other areas. Results are shown on table 7 and 8.

The activity is higher in the South and East parts of the area than in the North-West one.

Table 7: Vessels ≥ 15 meters having a fishing activity on the area of West Isle of Wight in 2008 (*from IFREMER*)

	Number	**Fishing time in the area (h)**	**Average dependence on the area (%)**
Bottom trawlers	7	24	0.11
Pelagic trawlers	10	340	1.89
Pelagic and bottom trawlers (vessel using both gears)	23	766	1.35
Dredgers	2	37	0.65
Total	42	1167	

As the previous one, this zone, localized in the 6 – 12 nautical miles of the English waters, can be frequented by French vessels, for fishing all species (according to the historical right for French vessels in English waters). As a consequence, the real number of vessels involved in this area should be closed to 80 benthic trawlers (50 from the North of France, 24 from the North Brittany and 6 from the South Brittany). Some netters can also be concerned.

Table 8: Benefits associated to West Isle of Wight for French vessels ≥ 15 meters in 2008 (*from IFREMER*)

	Number	**Average dependence on the area (%)**	**Total benefits (€) / losses for the fleet**	**Average benefits (€) / losses per vessel**
Bottom trawlers	7	0.11	4409	630
Pelagic trawlers	10	1.89	70719	7072
Pelagic and bottom trawlers (vessel using both gears)	23	1.35	157902	6865
Dredgers	2	0.65	5714	2857
Total	42		238744	5684

Once again, the estimation of the benefits is difficult to do because it doesn't take into account neither the vessels under 15 meters, neither the variability of the landings during the year and the fishing area.

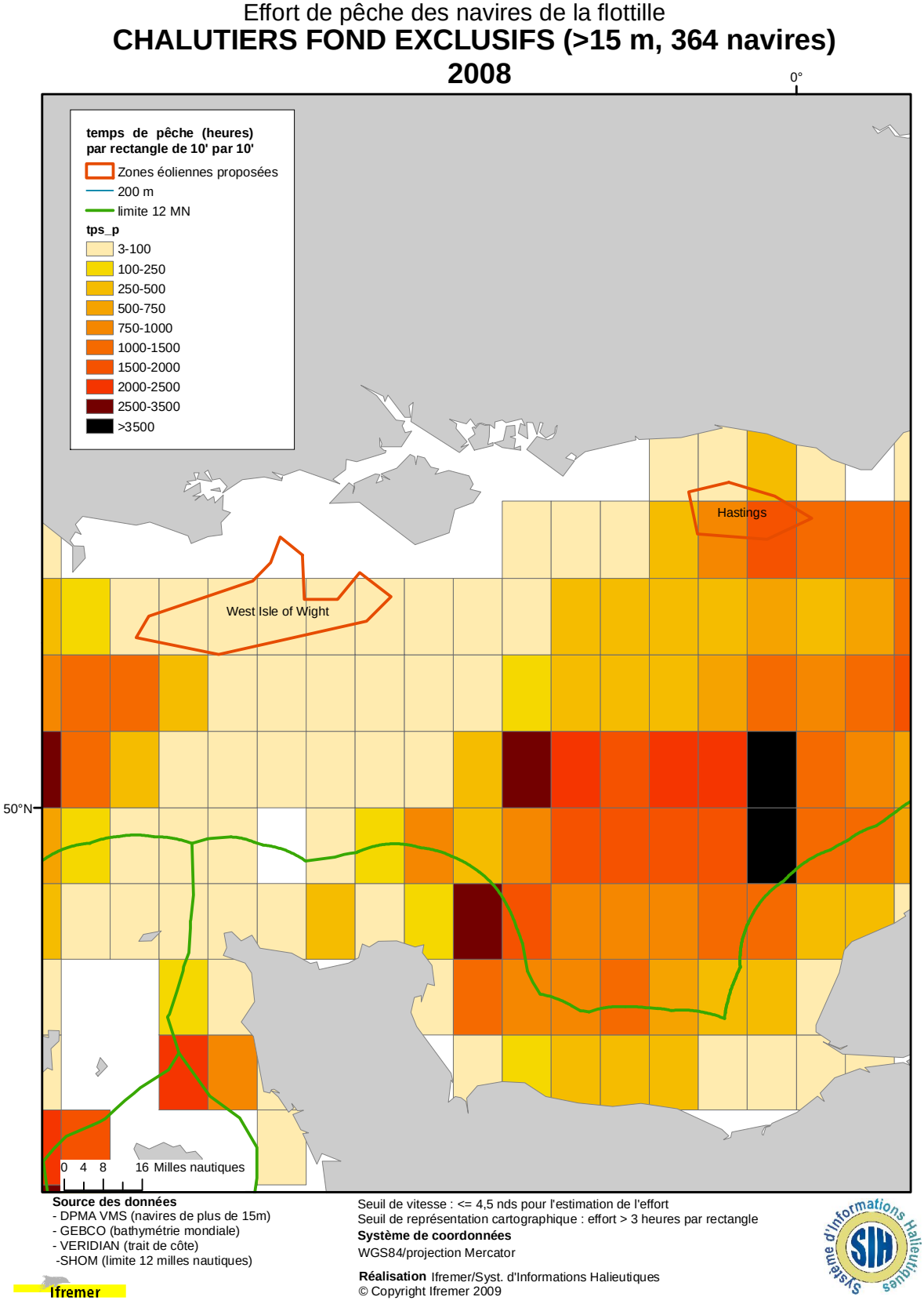

Figure 4: Localization of the fishing effort of the bottom trawlers in the areas 6 and 7 (Hastings and West Isle of Wight)

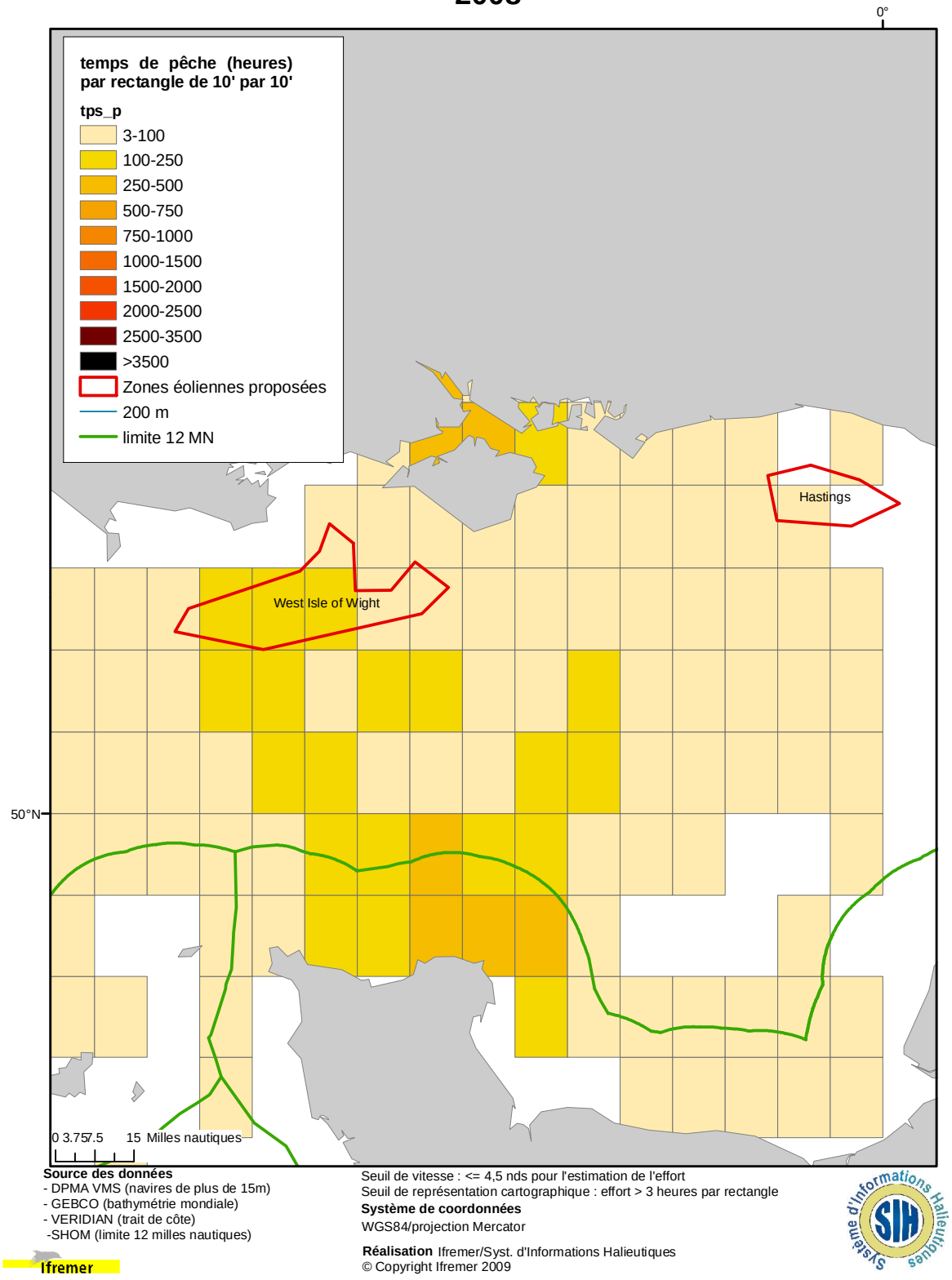

Figure 5: Localization of the fishing effort of the pelagic trawlers in the areas 6 and 7 (Hastings and West Isle of Wight)

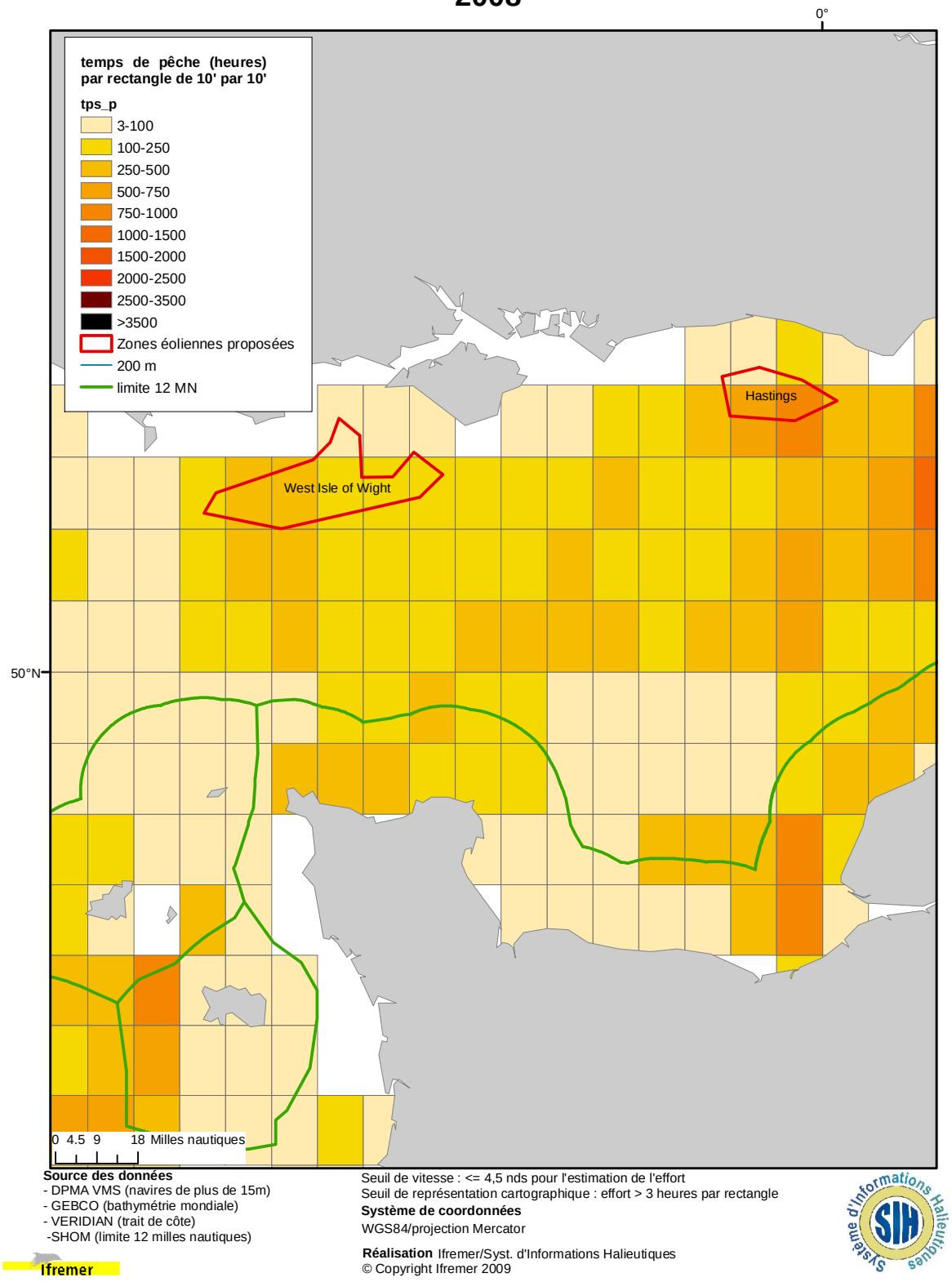

Figure 6: Localization of the fishing effort of the combined trawlers (using both bottom and pelagic trawls) in the areas 6 and 7 (Hastings and West Isle of Wight)

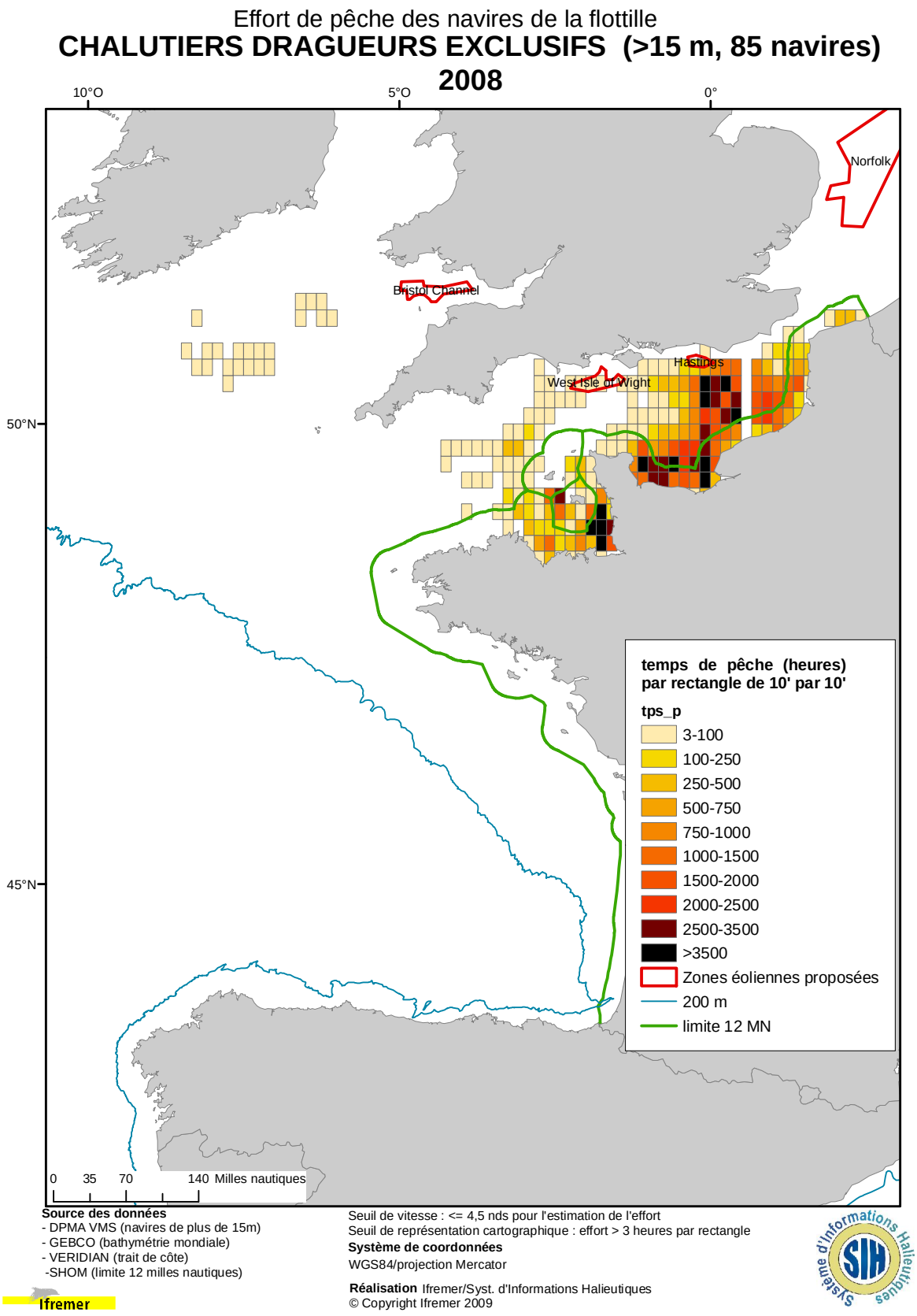

Figure 7: Localization of the fishing effort of the dredgers in the areas 6 and 7 (Hastings and West Isle of Wight)

B.7. Bristol Channel (Area 8)

Only 3 vessels had an activity in the area of Bristol Channel in 2008. The activity is concentrated on the East side of the area. Indeed, French vessels have historic rights between 6 and 12 nautical miles along the UK coast. So they are likely to fish more actively in this zone. The figure 8 shows some French vessels have an activity on the West of the area (about 50 trawlers and gillnetters) but not inside the area.

Table 9: Vessels ≥ 15 meters having a fishing activity on the area of Bristol Channel in 2008 (*from IFREMER*)

	Number	**Fishing time in the area (h)**	**Average dependence on the area (%)**
Bottom trawlers	2	10438	0.15
Vessel using nets and hooks	1	3462	0.1
Total	3	13900	

Table 10: Benefits associated to Bristol Channel for French vessels ≥ 15 meters in 2008 (*from IFREMER*)

	Number	**Average dependence on the area (%)**	**Total benefits (€) / losses for the fleet**	**Average benefits (€) / losses per vessel**
Bottom trawlers	2	0.15	1911	955
Vessel using nets and hooks	1	0.1	1122	1122
Total	3		3033	1011

B.8. Irish Sea (Area 9)

No French vessel had an activity in this area in 2008, but 20 trawlers and gillnetters from the South of Brittany have a fishing activity closed to the South boundary and are likely to use this area in the future (see figure 8).

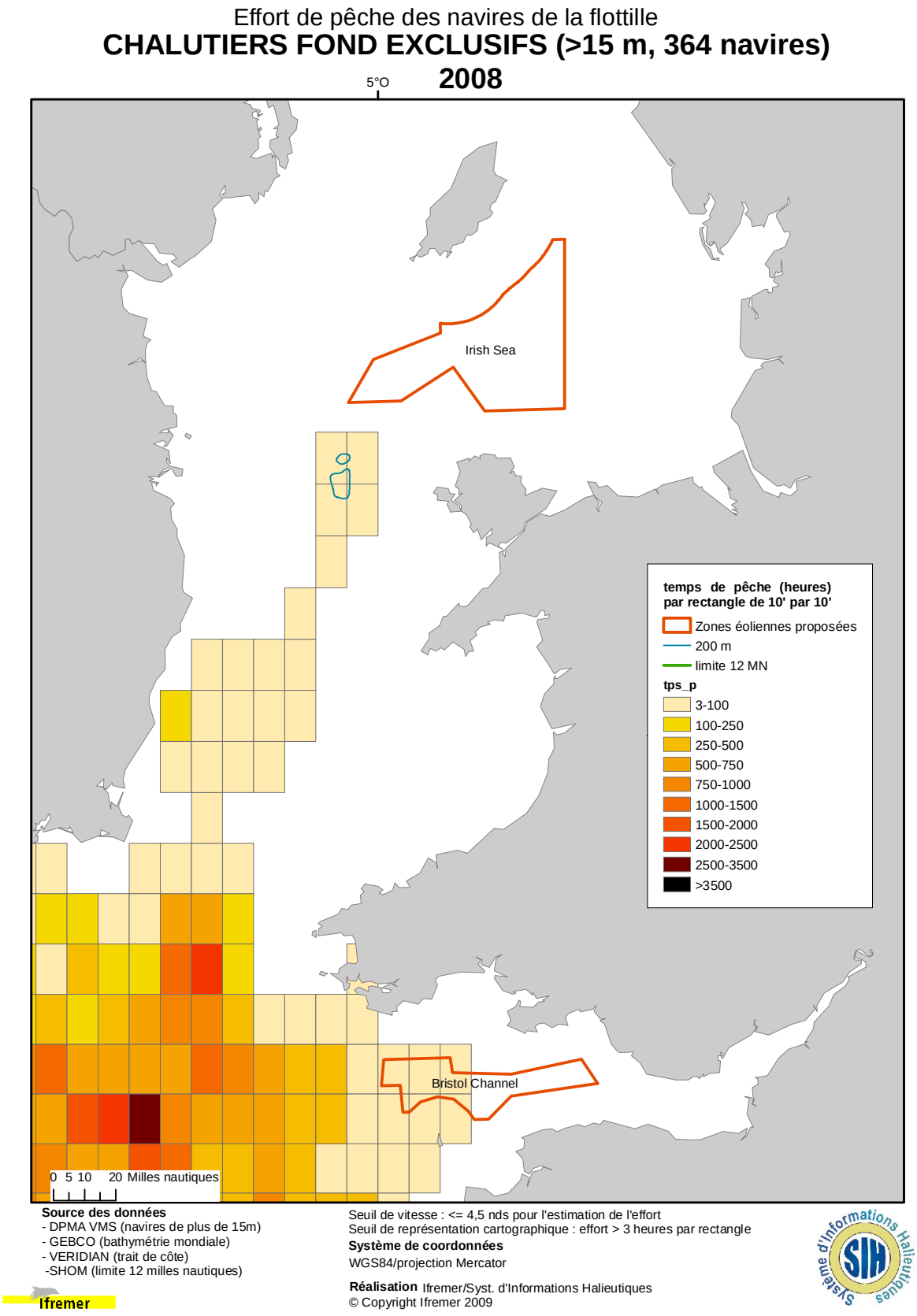

Figure 8: Localization of the fishing effort of the bottom trawlers in the areas 8 and 9 (Bristol Channel and Irish sea)