



Orkney Skate Trust  
14 Hillside Road  
Stromness  
Orkney  
KW16 3AH

31<sup>st</sup> July 2025

To whom it may concern,

This submission is a response to Ofgem's Draft Determinations for RIIO-T3. This response relates to the following questions:

- SHETQ2. Do you agree with our proposal to reject SHET's marine biodiversity EAP commitments? and;
- ETQ11. Do you have any views on our proposed approach to biodiversity funding, notably whether it is appropriate or not for consumers to fund biodiversity outputs beyond legislative requirements?

The Orkney Skate Trust (OST) is pleased to offer its full support for SSEN Transmission's continued investment in the natural capital of Scotland and its commitment to biodiversity and nature restoration initiatives.

For the past three years and counting, SSEN Transmission has provided invaluable support to our organisation. Without this partnership, we would not have been able to continue developing our innovative baited remote underwater video system, a non-invasive, evidence-based tool for collecting essential marine data. This system plays a critical role in the conservation of the critically endangered flapper skate (*Dipturus intermedius*) around Orkney. The value of this data is now being realised with the designation of Important Shark and Ray Areas (ISRA) around areas of Orkney as an internationally significant conservation tool for protection of endangered species of shark, skate, and ray. Data generated from project funds via SSEN Transmission have made this possible.

The data gathered through this technology not only aids in the conservation of these important species but also allows for the mapping and classification of marine habitats and biotopes where previously data was lacking. This provides a crucial evidence base to inform responsible, sustainable marine development and contributes significantly to national and local biodiversity objectives.

Beyond our own research, SSEN Transmission's support has had far-reaching impacts. It has enabled OST to transfer knowledge and capacity to other organisations across Scotland. Our [www.orkneyskatetrust.co.uk](http://www.orkneyskatetrust.co.uk)  
Email: [info@orkneyskatetrust.co.uk](mailto:info@orkneyskatetrust.co.uk)  
Telephone: 07917095037 (Chairman)



volunteers have trained other community and conservation groups in deploying remote cameras for citizen science surveys. Our equipment has also supported organisations such as UHI Shetland in conducting parallel studies in remote areas like Fair Isle, and allowed Orkney Sub Aqua Club and Seasearch divers to carry out adapted surveys using our technology.

This work directly supports the Scottish Government's ambitions for a nature-positive future and aligns with national priorities on biodiversity and marine spatial planning. Continued support for organisations like ours ensures that marine conservation and responsible development go hand in hand.

We are proud to endorse SSEN Transmission's efforts and encourage continued investment in environmental partnerships that support biodiversity, data-led conservation, and community engagement in marine science. We therefore do not agree with Ofgem's proposal to reject the marine biodiversity commitments from SSEN Transmission (SHET).

Should you wish to explore the benefits of such funding can yield to grass-roots conservation- based organisations like Orkney Skate Trust, I urge you to visit [www.orkneyskatetrust.co.uk](http://www.orkneyskatetrust.co.uk) and learn more.

Yours faithfully,

Daniel Wise

Chairman