Update on Hinkley Point C Nuclear Power Station, Somerset

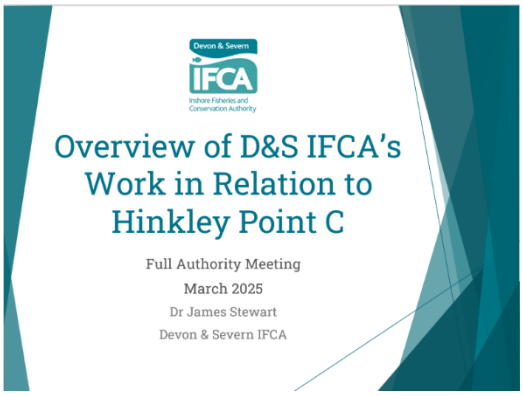
Officers' Recommendation

That Members note the content of the Officers' update on Hinkley Point C nuclear power station.

1. Background

At the March 2025 Authority meeting, Officers provided an overview of their work on Hinkley Point C (HPC) between 2017 – 2024. This presentation included detail of the large scale of fish kill that was predicted to occur due to HPC's intake of extremely large volumes of water from the Severn estuary (132,000 litres per second). The intake water will be used as part of the station's cooling system. Officers outlined that the developer (EDF) had been attempting to avoid their requirement to install an Acoustic Fish Deterrent (AFD).

The AFD is a requirement on the Marine Management Organisation's (MMO) Marine Licence and the Development Consent Order both granted in 2013. It was included in EDF's application for both permissions.



The AFD is a key mitigation measure that would encourage sound-sensitive fish species to avoid the water intakes.

In 2024 EDF stated that they had already "*made the decision in November 2017 not to proceed with the Acoustic Fish Deterrent system*."[1]

Since this decision in 2017:

(i) EDF has continued to build a system that would require an Acoustic Fish Deterrent, including placing infrastructure on the seabed.

(ii) EDF had not attempted to develop an appropriate Acoustic Fish Deterrent system or the remotely operated vehicles that it claimed would be required for maintenance of such a system.

(iii) EDF has initiated permit variation applications, environmental assessments and a Public Inquiry in an attempt to remove the requirement to install the Acoustic Fish Deterrent.

[1] Paragraph 2.2.17 of https://www.edfenergy.com/sites/default/files/2024-01/Preliminary%20Environmental%20Information%20Report%20%28PEIR%29%20Volume%201%20-%20Introduction.pdf

Instead of the deterrent system, EDF had been considering "compensatory measures" such as creation of new saltmarsh to make up for the fish killed.

However, the Officer's presentation in March 2025 ended with the update that EDF was no longer actively considering these compensatory measures, but were exploring new options for the Acoustic Fish Deterrent. In late 2024, EDF was presented with an alternative Acoustic Fish Deterrent option, that it began investigating for potential deployment. Further details were not publicly available at the time.

2. Acoustic Fish Deterrent and Update on HPC

EDF is now working with FishTek Marine to develop high and low frequency AFD technologies. Sound-sensitive fish species can only detect and respond to sounds of certain frequencies. Fish, such as shad and herring, respond to high frequency sounds, whereas lower frequencies would be required to deter species such as bass, cod, whiting and salmonids.

EDF has stated that laboratory and sea trials carried out by Swansea University have shown that the high frequency acoustic fish deterrent is proving to be very effective. Initial data suggests an effectiveness of 90% at keeping shad away from the cooling water intake heads.

This has been studied by placing AFD on some of the cooling water intake heads and using acoustic receivers (like underwater microphones) to detect tagged shad around the different intake heads. Officers understand that additional testing in tanks was planned to continue throughout the first half of 2026.

D&S IFCA has not seen results of any trials of the lower frequency deterrent.

The results of the research, as part of an application for AFD deployment, will be submitted for regulatory consideration and approval later in 2026, subject to unforeseen delays which may arise.

EDF must provide an Adaptive Monitoring and Management Plan (AMMP) that allows ongoing monitoring of the AFD, and corrective action, to ensure it operates as expected throughout the lifespan of the project.

The suitability of the AFD and AMMP must be reviewed by the MMO, in consultation with the Environment Agency, Natural England and Natural Resources Wales. D&S IFCA has a non-statutory role to play in reviewing the AMMP.

3. Update on Officer Involvement Since March 2025

Officers have attended several meetings relating to HPC since March 2025, including:

- Multi-regulator meeting with EDF representatives to discuss EDF's progress towards fulfilment of specific conditions of the Development Consent Order, which included a focus on fish protections: June 2025.
- the Environment Agency's Hinkley Point 'Meet the Regulator' meetings (for site updates): April 2025, November 2025, March 2026.
- The Environment Agency's national 'Meet the Regulator' meetings: October 2025, June 2026.

Officers have reviewed environmental reports provided by EDF through the HPC Marine Technical Forum, relating to the main HPC site and EDF's Combwich Wharf site.

Officers have also considered a consultation on a Marine Licence Application, for EDF to vary an existing Marine Licence (May-June 2026); after the usual triage process applied to the consultation materials, no response was required from D&S IFCA. Reasons for this were documented as part of D&S IFCA's record-keeping procedures.

In December 2025, Officers took the opportunity to review and respond to the Government-commissioned Nuclear Regulatory Review, also known as the 'Fingleton Review'. The Fingleton Review relies heavily on a flawed case study of HPC.

The Fingleton Review's HPC case study states that EDF has spent £700 million (unverified) on fish protection measures, which EDF estimates will "save 0.083 salmon per year, along with 0.028 sea trout, 6 river lamprey, 18 Allis shad, and 528 twaite shad". The case study does not reflect the agreed impacts or recent fish tracking evidence, and it is deeply concerning that these estimates have been repeated without verification. The Fingleton Review has entirely overlooked the substantial marine fish kill that has been calculated will occur due to HPC. The most appropriate calculations of marine fish kill show that this will include the equivalent of over 4.6 million adult fish per year, including the equivalent of a total of 450 tonnes of adult cod, whiting and herring.

The case study, and other examples which criticise regulatory delays, also do not reflect that EDF (through their own admission) have been responsible for a seven-year delay in development and installation of the AFD. The flawed HPC case study underpins the Fingleton Review's discussions of the proportionality of environmental assessments, mitigations and compensatory measures, and supports significant recommendations. Officers argued that these recommendations should now be re-evaluated using accurate evidence. The full D&S IFCA response is available in D&S IFCA's Resource Library. It was shared with media outlets that covered the Fingleton Review, as well as MPs, Ministers, the Prime Minister, regulators and NGOs.

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background Papers

Authority meeting minutes (March 2025)

Draft Authority meeting minutes (March 2026)

News Item (Blog) – D&S IFCA Challenges Fingleton Nuclear Regulatory Review 2025 (published 19th December 2025)

News Item (Pdf version) – D&S IFCA Challenges Fingleton Nuclear Regulatory Review 2025 (published 19th December 2025)

D&S IFCA Response to Fingleton Regulatory Review 2025