What NOT4IOM Learned from MIMA's Mooir Vannin Examination

An account of the evidence submitted during the examination process

The examination of the proposed Mooir Vannin offshore wind farm closed on 9 September 2026.

NOT4IOM has since reviewed the evidence submitted to the Examining Body over the entire examination process.

We believe the public is entitled to a detailed yet plain account.

This is our account as we see the evidence. It is worth the read for a wind farm that could harm the environmental and economic wellbeing of generations to come.

Want to know more?

Follow the links to the evidence. Read and judge for yourself.

THE QUICK ACCOUNT

- Estimated revenue for the Isle of Man is unverified and unsecured.
- Manx taxpayers could face a potential decommissioning bill of up to £740 million.
- The Isle of Man’s tourism industry is put at risk.
- Mooir Vannin will not contribute to the Island’s 2030 grid decarbonisation goals.
- Cheaper electricity is not guaranteed by Ørsted or Manx Utilities.
- Island Link and grid updates are uncosted.
- Ørsted now commits to only 5–10 Isle of Man jobs per phase, not 30.
- Manx Wildlife Trust and Manx Bat Group have raised the alarm on significant bird and bat deaths.
- Our UNESCO Biosphere status is potentially at risk.
- Serious objections from Stena Line, the Isle of Man Steam Packet Company, the Ministry of Defence, and Walney affiliates remain unresolved.
- Ørsted is seeking approval for a back-up plan that has never been subject to a planning application.
- Mooir Vannin could be one of up to six more giant offshore wind farms around the Island.

THE DETAILED ACCOUNT

The money risk: unsecured and unverified revenues, with last minute submissions to 'prove' the legal basis

Ørsted claims Mooir Vannin will deliver up to £2.4 billion to the Isle of Man Government over its 35-year lifetime, an average of about £57 million a year. Yet in real terms, Treasury's own modelling puts revenue between £0.7 billion and £1.9 billion, with a central case of £1.2 billion. Most critically, no revenue estimates have been independently verified. Not Ørsted's, not Treasury's. Further, Treasury confirmed that revenue is currently unsecured, depends on the wind farm's profitability over its 35-year lifespan, and relies on new tax measures not yet enacted by Tynwald.

The Examining Body was not persuaded by Ørsted's revenue claims either, so it required Ørsted to submit an opinion from a King's Council on whether revenue can lawfully count as a planning benefit. Yes, the KC found that Government revenue is "legally capable of being relevant and important". But NOT4IOM has never argued otherwise. The case throughout this examination has concerned legal weight, and the Examining Body asked Ørsted to demonstrate "what weight, if any, could lawfully and reasonably be attributed to" the anticipated revenues. The KC's Opinion dealt with weight only briefly and did not engage with the uncertainty or timing of the revenues.

As for timing, the Examining Body asked Ørsted for a response by Deadline 8, 28 August 2026. The KC's Opinion is dated 7 September 2026 and was filed on 9 September 2026, the day the examination closed.

That gave no Government department, no Principal Stakeholder, in fact no one, any opportunity to review and challenge it. In a 130-day examination, key evidence on one of the claimed principal benefits arrived on the last day. The Examination Library even records it as a late submission.

https://mima.gov.im/media/nmabxuki/the-treasury.pdf
https://mima.gov.im/media/iyyngyj2/kings-counsel.pdf

THE DETAILED ACCOUNT

Decommissioning risk: Manx taxpayers face a potential clean-up bill of up to £740 million

This is the single biggest financial risk to the Isle of Man public. Applying the UK Department for Energy Security and Net Zero (DESNZ) decommissioning cost ranges cited in Treasury's own evidence, NOT4IOM calculates decommissioning costs broadly in the order of up to £740 million.

Not a penny of it is secured. At the end of the examination there is still no financial guarantee in place for decommissioning. NOT4IOM asked for a proper financial security package at Deadline 7, again at Deadline 8 and again at Deadline 9. We received no response.

Ørsted's Outline Decommissioning Plan deals with the cost of decommissioning in a single sentence: "All required financial information shall be provided to the Department in a 'CONFIDENTIAL' Annex."

That's it.

So, there is no transparency, no bond, no escrow, no parent company guarantee, no independently reviewed cost estimate.

If the wind farm operator fails decades from now, the clean-up of an industrial site abandoned in Manx waters will fall on the public.

This could be a major financial liability for future generations. It needs more than one sentence shrouded in confidentiality.

https://mima.gov.im/media/2wxcm0sz/f117-outline-decommissioning-plan-tracked-changes.pdf

THE DETAILED ACCOUNT

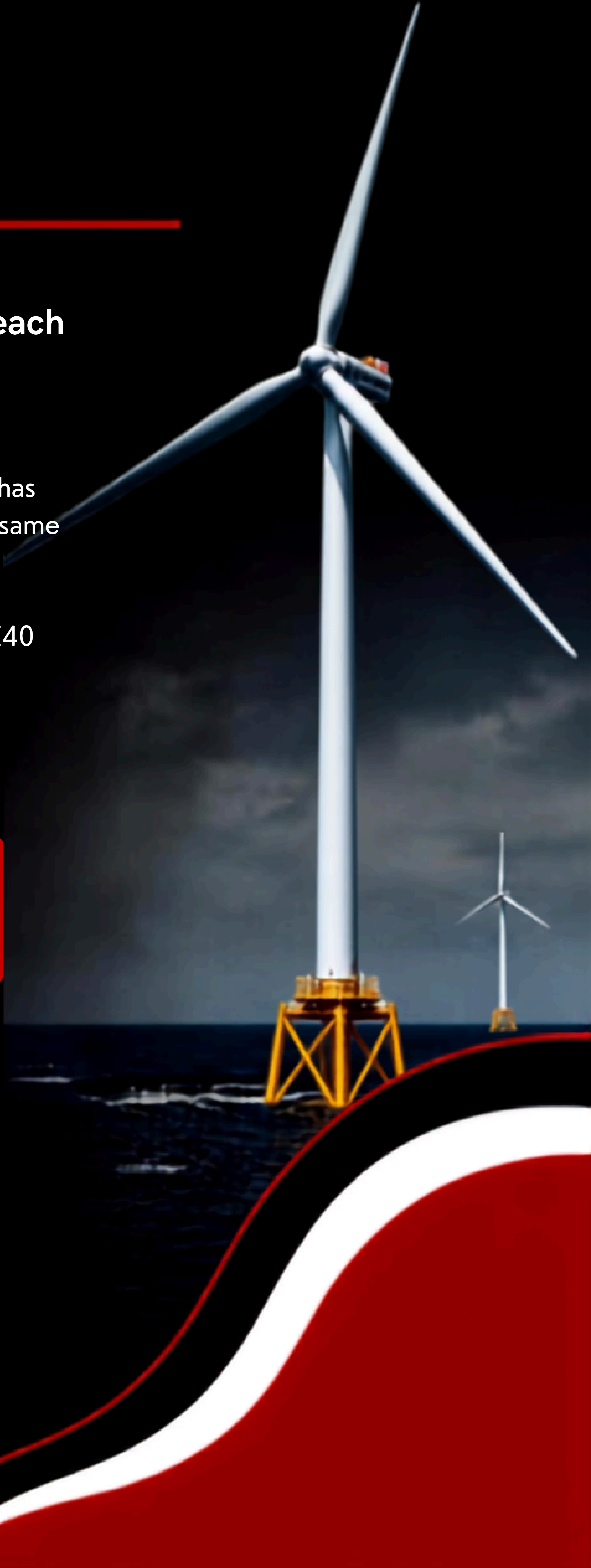
Tourism: risking visitor revenue worth more each year than Mooir Vannin might pay

The 2025 Visit Isle of Man Annual Visitor Economy Report puts the tourism industry’s contribution to the exchequer at £43 million/year. Treasury itself has told the examination that the visitor economy’s exchequer impact is “of the same order of magnitude” as Mooir Vannin’s expected revenue.

On Treasury’s central case, the wind farm’s revenue in real terms is around £40 million a year. That is less than what the visitor economy already delivers.

Further, Treasury has stated that any negative impact on the Island’s tourism industry “is uncertain”.

The public is being asked to accept a permanent, unmitigable transformation of the Island’s eastern seascape in exchange for annual revenue potentially lower than a healthy visitor economy already delivers.



A 15-year community fund for a 35-year wind farm?

The proposed community fund offers “up to £22.5 million over 15 years for a project that Ørsted themselves will invest around £4.5 billion to build.

Is that £1.5 million a year a fair share for an Island that will bear all the visual, environmental and potentially also economic impacts of Mooir Vannin?

And why is Ørsted offering a community fund for 15 years when the wind farm is supposed to operate for 35 years?

https://www-visisleofman.com/dbings/Viom-2025-Annual-Visitor-Economy-Report.pdf

THE DETAILED ACCOUNT

35 Is the 35-year lifespan even realistic?

How do we know that Mooir Vannin's 35-year operational life is credible? We don't.

No design certification or operating precedent supports the claimed 35-year lifespan. Industry norms put the average lifespan of offshore turbines at just 20 to 25 years.

No offshore wind farm anywhere has run for 35 years. The industry itself is barely 35 years old. At the very least, Ørsted should identify the certification basis for a 35-year life, given this would be significantly above the industry average.

The 35-year lifespan matters because it underpins all the revenue estimates. Treasury's calculations assume 35 years simply because that is what has been proposed. If the lifespan turns out to be shorter, revenues fall and stop sooner.

It would be prudent for Ørsted and Treasury to state estimated revenues based on more realistic lifespans of 20, 25 and 30 years. Until then, the revenue is unverified in this respect too.

No contribution to the Island's 2030 grid decarbonisation targets

Many Islanders are under the impression that Mooir Vannin will contribute to the Isle of Man's own net zero goals. This is a wholly plausible assumption given Mooir Vannin would sit in Manx territorial waters. However, Ørsted itself has confirmed the position: "the government policy isn't to have an offshore wind farm to decarbonise the Manx electricity grid. The policy says to have an offshore wind farm to decarbonise the UK grid".

Mooir Vannin was conceived as an energy export project, and it remains one. Its purpose is environmental benefit for the United Kingdom and money for the Island. And the money may be smaller, less certain and later than the public has been told.

So, Mooir Vannin was never intended to contribute to the Isle of Man's 2030 targets, and it won't.

Nor do the Island's climate obligations require this project. The Department of Environment, Food and Agriculture (DEFA) confirmed that the Island's emissions are reported through the UK's submissions, and a Council of Ministers paper shows the Island faces no penalties or sanctions if Paris commitments are not met and can withdraw.

The claimed "need" for this project in the Island's own transition is therefore weak. It does not appear as an essential component of the Manx Utilities transition roadmap.

www.renewableenergyhub.co.uk/main/wind-turbines/how-long-will-the-wind-turbine-last

https://imma.gov.im/media/3650/355-applicants-written-summary-of-s-10.pdf

THE DETAILED ACCOUNT

Cheaper electricity has been touted, but is not secured by Manx Utilities or Ørsted

Mooir Vannin was sold to the public as a route to cheaper household electricity. The idea is a power purchase agreement. The Isle of Man would buy back, at a reduced rate subsidised by Ørsted, electricity generated by Mooir Vannin and sent to the UK grid. The subsidy would be offered in lieu of constructing the Island Link.

Yet Ørsted accepts that a power purchase agreement is not part of the current planning application, carries no weight in the planning balance and has no certainty of delivery. It has also confirmed to the BBC that it does "not control electricity prices on the island".

And yet Ørsted continues to promote cheaper electricity to the public while conceding that there is currently no mechanism, and no control, that would enable it to deliver cheaper electricity.

Manx Utilities Authority (MUA) has since distanced itself from Ørsted's claims of cheaper electricity. MUA has stated that it cannot "quantify or validate" customer benefits and that any estimate now "would be speculative".

That is the Island's electricity supplier declining to say that its customers would pay less.

MUA rightly points out that any reduction in customer bills depends on a significant range of uncontrollable factors, including market conditions, wholesale prices, regulatory arrangements, contractual structures and government policy.

And this is important. Any power purchase agreement would be priced against the UK grid's wholesale electricity rates. We have no idea what that future rate will be, and the Isle of Man has no control over it.

That rate, set by the UK market, could turn out to be higher than the cost of the Island's own electricity produced at the Pulrose power station. So, the Island could get a reduced rate for UK grid electricity that is still higher than the cost of Manx electricity, meaning no consumer savings.

https://mima.gov-im/media/dumdildm/g731-applicants-written-summary-of-sih8.pdf

THE DETAILED ACCOUNT

The Island Link: unknown and uncosted grid upgrades

As for the proposed cable, or 'Island Link', between Mooir Vannin and the Isle of Man, MUA has confirmed that no preferred solution has been selected, the grid connection point and route have not been finalised, and it cannot quantify "any related capital costs, operating costs, customer benefits or wider economic outcomes". Any estimate now "would be speculative".

Connecting Mooir Vannin would require significant modifications to the Island's electricity grid to accommodate the 100 MW connection that Ørsted has offered the Island.

It remains unclear who would pay for those grid modifications. That is a clear financial gap that has not been quantified and could run to hundreds of millions.

And one "minor" side point. The Isle of Man's average electricity demand is around 40 MW. So, why is Ørsted offering 100 MW? What happens to the surplus? Will the Isle of Man be expected to pay constraint costs to switch off turbines generating surplus electricity?

Note to readers: constraint costs are payments to wind farm developers to switch off turbines when a grid cannot absorb the power due to grid constraints. As a result, grid operators have to pay another generator closer to the point of consumption, and still pay the wind farm operator who is under contract.

Yes, that's right. The public pays developers to turn turbines off.

https://mima.gov.im/media/dumdildm/g731-applicants-written-summary-of-sih8.pdf

THE DETAILED ACCOUNT

Jobs: Ørsted withdrew its 30-job claim and now commits to just 5 to 10 Isle of Man roles per phase

Ørsted has confirmed in its evidence to the Examining Body that the 30 operations and maintenance jobs it previously promoted are not secured by its planning application and should not be treated as a benefit of consent.

The figure was removed from its outline employment plan at Deadline 4. Ørsted itself described the employment opportunity for the Isle of Man as "modest", with approximately 5 to 10 jobs secured for each key phase.

Despite this, Ørsted continues to publicise the creation of "at least 30 direct land-based jobs" in its comments to the BBC dated 24 August 2026. NOT4IOM wrote to the Examining Body to highlight the discrepancies between what Ørsted says in evidence and what it says to the public.

As for the roughly 2,000 offshore construction jobs, Ørsted has confirmed that these will largely go elsewhere.

Ørsted accepts that it "can't commit to jobs actually being taken by Isle of Man residents" and that "there would be very little Isle of Man workforce capable" of taking up the construction roles.

5-10 jobs per phase

https://mima.gov.im/media/cg3onakd/g733-applicants-written-summary-of-sih10.pdf

THE DETAILED ACCOUNT

Wildlife at risk, mitigation solutions inadequate

Ørsted predicts Mooir Vannin will result in 660 bird deaths a year.

That estimate is bad enough. But the Manx Wildlife Trust has stated that several of Ørsted's "baseline ecological assessments are inadequate" and do not reflect local-level ecological impacts because they have not considered the Manx context.

That means more bird deaths are likely. And that is not hard to imagine when the 309 predicted Guillemot deaths a year represents around 21% of the known Manx over-wintering population and the 149.5 predicted Razorbill deaths a year exceed the entire Manx over-wintering population.

Manx Wildlife Trust has also pointed out that Ørsted has failed to suggest suitable mitigating actions, even though these are still required.

As for marine wildlife, the evidence shows significant impacts on cetaceans and benthic ecology, and destruction within key herring spawning and scallop grounds. Yet management plans were still being rewritten as the examination closed.

DEFA continues to press for a fully developed sandeel monitoring framework, integrated with the herring mitigation plan. And DEFA regards the survey of the second herring spawning peak, and the application of its results, as "essential".

Even more baffling, DEFA reports that after the Examining Body asked for scour to be reassessed under more extreme conditions, and with wave heights of up to 8.4 metres recorded in the area, Ørsted replaced its 3 metre wave assessment with one using 1.5 metre waves, so that "the assessment appears to no longer consider extreme weather conditions".

DEFA "remains concerned" that scour and sediment mobilisation "may therefore be underestimated".

https://www.mwt.im/MooirVannin

660

THE DETAILED ACCOUNT

The Island's UNESCO Biosphere status at risk

The Isle of Man and its territorial seas form UNESCO's only whole-nation Biosphere. The designation is granted by UNESCO under its Man and the Biosphere programme. It is administered locally by Biosphere Isle of Man, an Isle of Man Government team. The two are not the same.

A project on this scale, 81 square miles of turbines inside the Biosphere, accepting major, unmitigable landscape and seascape harm in exchange for revenue, sits contrary to the purpose and principles of the programme.

Despite requests through the Examining Body, and a direct letter from a Principal Stakeholder to UNESCO on 24 June 2026, there is no submission from UNESCO or the UK National Commission for UNESCO anywhere in the Examination Library.

UNESCO is arguably the only independent body that can authoritatively confirm whether Mooir Vannin puts the Island's Biosphere status at risk.

Its views have never been obtained.

THE DETAILED ACCOUNT

Stena Line's and IOM Steam Packet's objections left unanswered by Ørsted

In a frank assessment, Stena Line stated that "throughout the examination [Ørsted] and its team have shown very little regard to the genuine concerns of Stena". Ørsted has not demonstrated navigational safety to the required standard, and the protections offered do not fully address Stena's concerns, leaving Stena with "no choice but to maintain its objection" to Mooir Vannin.

It is not a minor detail when a major ferry operator says that a developer has shown "very little regard" for its genuine concerns and that navigational safety has not been demonstrated.

As for the Isle of Man Steam Packet Company, one of the Island's lifeline ferry operators, it has raised serious concerns about a material increase in collision risk. The Steam Packet says Mooir Vannin will create a man-made navigational chokepoint, with displaced marine traffic funnelled into a narrowed route between the Mooir Vannin, Walney and Morgan wind farms. Applying international guidance, the Steam Packet requires a minimum separation in excess of 5 nautical miles of sea room. The gap between Mooir Vannin and the Morgan wind farm is just 4.1 nautical miles.

Again, Ørsted has disregarded the concerns of a ferry operator, and one responsible for transporting Islanders, tourists, and essential food and medical supplies.

Better qualified than the MCA?

On what basis does Ørsted consider itself better qualified than the Steam Packet, the UK Maritime and Coastguard Agency and the World Association for Waterborne Transport Infrastructure to decide how much sea room ships need?

https://mima.gov.im/media/j5ybr5ee/stena-line.pdf
https://mima.gov.im/media/vrvjvc0j/g28-statement-of-common-ground-between-mooir-vannin-offshore-wind-farm-limit-updated.pdf

THE DETAILED ACCOUNT

Ministry of Defence's objection left unanswered

Despite months of negotiations, the Ministry of Defence confirmed at the close of the examination that "a technically and operationally viable mitigation solution has not been identified" and that it remains concerned Mooir Vannin will interfere with the Primary Surveillance Radar at BAE Systems' Warton Aerodrome.

No solution has been agreed before consent, and the MoD has confirmed that its objection to the project "cannot be removed and is maintained".

Ørsted's own affiliates' objections left unanswered

The operators of the existing Walney wind farms, companies within or connected to Ørsted's own group, told the Examining Body that Ørsted failed to resolve matters before applying for consent, that their objection on wake impacts on the Walney turbines is unanswered, and that stakeholders were not given a fair opportunity to consider the alternative layout.

When a developer's own affiliates say the application is not ready, the point is hard to dismiss.

https://mima.gov.im/media/v2wflhj2/g138-statement-of-common-ground-between-mooir-vannin-offshore-wind-farm-limited-and-ministry-of-defence-uk-defence-infrastructure-organisation.pdf

https://mima.gov.im/media/kaapycsc/walney-and-wods.pdf

THE DETAILED ACCOUNT

A planning application before any Marine Spatial Plan: the cart before the horse

Despite Ørsted and the Government having been in a contractual agreement since 2015, the planning application has been presented prematurely.

In particular, there is no Marine Spatial Plan in place.

As Dr Alex Allinson told the examination, "[a] decision was made by the Energy Policy Board not to go ahead with [accurate marine spatial mapping] and a proposal for seabed option auctions until the decision on the Ørsted application had been concluded to maximise possible future interest from other developers."

That is confirmation that the Marine Spatial Plan was deferred as a matter of policy, so that this application would be decided first and would set the precedent for serial development.

The Isle of Man has no finalised statutory Marine Spatial Plan or comprehensive strategic framework for its territorial waters, although baseline options, such as the Manx Marine Environmental Assessment, exist. England, Scotland and Wales have marine plans under the UK Marine Policy Statement framework. The Republic of Ireland adopted its National Marine Planning Framework in June 2021.

Ørsted has said that MIMA does not require a Marine Plan to be in place. That is true. It is also the point. A consenting regime designed to operate within a Marine Plan is being used without one, for the largest development ever proposed for the Island, on a site allocated in 2015 with no spatial assessment of alternatives, while the Marine Plan that would have supplied that assessment has been deliberately held back until after the decision.

The sequence has been reversed. National strategy is being shaped around a commercial application, rather than the application being tested against national strategy

https://mima.gov-im/media/5r31e0e3/dr alex-allinson-1

THE DETAILED ACCOUNT

Scheme 2: a back-up scheme that has never been applied for

Before the Examining Body is Ørsted's application for Marine Infrastructure Consent (MIC) to build up to 87 turbines covering approximately 211 km^2, located 6 to 12 nautical miles off the east coast, and generating 1,400 MW in power and an estimated £2.4 billion in revenue for the Island. This is "Scheme 1". In planning terms, it is the 'Application'.

Scheme 1 faced sustained public backlash over its visual, environmental and economic impacts.

So Ørsted put a reduced layout before the Examining Body called the "Thought Experiment" or "Scheme 2" . Scheme 2 scales the wind farm down to 72 turbines covering approximately 113 km^2, generating 1,100 MW and an estimated £1.8 billion in revenue for the Island.

However, Ørsted has never applied for Marine Infrastructure Consent for Scheme 2.

The evidence for and against Scheme 2 has never been gathered. It has never been studied or fully assessed. The public has never been consulted on it. NOT4IOM's position throughout has been that a change of this scale requires a formal change request under section 28(5) of MIMA. None was made.

This examination is solely for Scheme 1.
If the Council of Ministers approves Scheme 2, it will be approving a scheme that has never been through a MIMA application and has never been formally studied or consulted on.

Scheme 2 also shows how tightly bounded the economics may be. If the project needs scale to be viable for UK export, a reduction to 72 turbines raises an obvious question. How close to the margin of viability would Scheme 2 sit?

THE DETAILED ACCOUNT

9 GW of wind farms around the Isle of Man. Is this our future?

The examination revealed that the Government has contemplated more offshore wind farms around the Island.

Dr Alex Allinson, the former Treasury Minister, stated that the Island has a technical potential of 9 GW of offshore wind, that Mooir Vannin is “the first to prove the concept of such developments” within the Island’s territorial waters, and that KPMG has modelled option fees of up to £600 million a year should up to 6 GW of wind farms be developed.

Meaning the Isle of Man could be surrounded by multiple wind farms, potentially 6 more, with the loss of more seascapes, fishing grounds and further environmental harm.

Ørsted settles with the Manx Fish Producers Organisation

On the day the examination closed, the Manx Fish Producers Organisation confirmed a mitigation settlement with Ørsted and withdrew its objection.

The fishermen were organised and represented, and no one criticises them.

But no fund and no agreement exists for anyone else.

A wind farm developer does not pay to settle harm it believes does not exist.

https://mima.gov-im/media/nnabksno/manx-fish-producers-organisation-1.pdf
https://mima.gov-im/media/5r3lee03/dr-alex-allinson-1.pdf

What happens next?

The Examining Body has 60 working days from 9 September 2026 to send its report to the Council of Ministers. That takes us to early December.

The Council of Ministers then has 30 working days to decide.

The general election falls in between, on 24 September. So, the next Council of Ministers will decide on Mooir Vannin.

What can you do?
Three things.

1 **Sign the petition** to Say No Mooir Vannin that will go to Tynwald. Join 12,000 residents who have already signed.

Sign here!

2 **Speak to your MHK candidates.** Tell them your concerns. Tell them you want your views represented. Tell them you SAY NO MOOIR VANNIN.

3 **Spread the word** and ask others if they have signed the petition.

GET IN TOUCH

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FOR RENEWABLES.
AGAINST A BAD DEAL FOR THE ISLE OF MAN.