



Offshore Renewable Energy Policy Position

*Powering Healthy Seas through a
Nature-Positive Energy Transition*



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INTRODUCTION



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The nature and climate crises are indivisible. Healthy marine ecosystems are crucial for climate change mitigation and human well-being.

Ireland's marine and coastal habitats provide important feeding and breeding grounds for a wide variety of seabird species and other biodiversity. Unfortunately, many of our seabird species are facing threats, such as disturbance at breeding colonies, predation, poor productivity due to changes in food supplies and pollution. Climate change also poses a huge threat to seabirds and other biodiversity, as well as to people. The Earth's oceans are soaking up global carbon emissions, resulting in warmer waters and sea level rise threatening marine ecosystems.

The Seabirds Count Census, which looked at seabird populations across the UK and Ireland between 2015 and 2021, showed that 11 of the 21 seabird species with comparable data have declined since the last census in 1998-2002. The iconic Puffin, for example, has declined by 28% in Ireland and is now a globally Red-listed Bird of Conservation Concern, meaning it is vulnerable to extinction.

Renewable energy is one of the key tools that we can use to eliminate fossil fuel use to cut greenhouse gas emissions, address climate change and meet our national and EU climate commitments. Ireland aims to generate 80% of its electricity from renewable sources by 2030 and this transition will focus heavily on the expansion of wind energy, particularly offshore wind. Offshore wind (henceforth, ORE) is a proven technology that has a key role to play in the renewable energy transition.

To ensure the energy transition at sea does not contribute to further losses of nature, the protection and restoration of marine ecosystems **must** be pursued hand in hand with, and with equal ambition to, the expansion of offshore renewables.

Restoration is not just an ambition; it is an absolute necessity. In 2024 the Nature Restoration Law was passed at EU level. This landmark regulation which is in force already requires member states to restore 20% of the EU's land and sea areas by 2030 and all ecosystems by 2050.



Kittiwake. Photo: Brian Burke.



Sooty Shearwater. Photo: Jamie Durrant.

THE EFFECTS OF ORE ON BIRDS



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The relationship between ORE developments and birds is variable and complex. The expansion of Ireland's ORE, from one wind farm to the scale and ambition that government proposes, poses potential new threats to Ireland's seabirds and other birds that use Irish waters. This new activity and infrastructure will interact with existing pressures from overfishing, dredging of habitats and warming waters, as well as issues at breeding colonies.

The effects of ORE depend on a number of factors, including the location, extent and type of development and associated infrastructure, the bird species present and their distribution and abundance at different times of the year.

While BirdWatch Ireland supports the production of renewable energy and offshore wind, it is vital that ORE devices and infrastructure are sensitively located to minimise negative impacts on seabirds, marine and terrestrial ecosystems, and other biodiversity including terrestrial bird species. Potential negative impacts include:

- Mortality due to collision with turbine infrastructure.
- Displacement – seabirds avoiding an area resulting in loss of habitat.
- Barrier effect – wind turbines interfere with birds' preferred migration and feeding routes.
- Cumulative impacts – In the coming years, we can expect an expansion of wind energy developments in Ireland, and in other countries, as we work towards meeting our carbon commitments. The cumulative effects of these developments at a local and a flyway level, and how they interact with other pressures and threats must be assessed and avoided during the planning process.
- Wider ecological impacts – ORE developments can have wider ecological impacts on the fish and other prey that many of our seabirds rely on, particularly during the construction phase.
- Construction impacts such as the acoustic impact of pile-driving on fish and cetacean populations and cabling to onshore substations which may impact coastal habitats.
- Construction impacts due to changes to seabed habitats and disruption of sediment flow between sandbanks and adjacent beaches (geomorphology) including relating to laying cables and establishing substations.



Photo: Ben Andrew/ RSPB Images.

A NATURE POSITIVE APPROACH



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Nature Positive¹ is a call to action for governments to not only halt the current trend of biodiversity loss, but to reverse this trend by increasing the health, abundance, diversity and resilience of species, populations and ecosystems so that by 2030 nature is on the path of recovery, and is fully recovered by 2050 so that thriving ecosystems and nature-based solutions continue to support future generations, the diversity of life and play a critical role in halting catastrophic climate breakdown.

Many negative impacts can be minimised or reduced by avoiding sites with sensitive habitats and key populations of vulnerable and endangered species. However, it is essential that more research is undertaken to lead to a better understanding of seabirds and the effects of wind energy on them including how seabirds, and other bird species, use Irish waters. Some of this will be needed in advance of construction, as mitigating impacts is much more difficult once structures are in place.

Negative impacts from offshore wind developments must be avoided to the greatest extent possible by siting them where they will cause least harm. A robust and strategic ecological evidence base complemented by decision-supporting tools, including sensitivity mapping, must inform the identification of these areas. The availability of areas where harm from offshore wind is low will determine the spatial extent of development possible. International cooperation is essential to maximise the efficiency of the expansion of offshore wind and associated infrastructure.

The standardisation, coordination, and open sharing of data and impact assessments related to renewable energy developments can contribute to improving our understanding of the ecological processes linked to developments and inform and improve strategic spatial planning.

Critically, restoration of habitats in our seas as well as undertaking conservation measures to address pressures on breeding, such as predation, must be progressed as a matter of urgency to support seabird populations and minimise existing pressures and future threats.

Sufficient space should be allocated for the protection and restoration of nature within an ecologically coherent network of marine Special Protection Areas for birds (based on identified marine Important Bird Areas) and marine protected areas (MPAs) that are effectively managed and protected from harmful activities. Together with BirdLife International, we have identified Marine Important Bird and Biodiversity Areas in Irish waters and these should be designated as SPAs for birds.

Such areas and the connectivity between them, including bird migration corridors, must form the backbone of marine spatial plans. Protected areas, together with a suitable buffer zone, are generally highly sensitive and therefore very unlikely to be suitable for any development, and should, for precautionary avoidance and legal certainty, be excluded as much as possible from any offshore renewable energy development and related electricity grid network infrastructure.

Ireland is still in the dark ages in its understanding of how wild birds use marine waters. Further detailed tracking and productivity data is critical in this regard and through cross-border research with the UK and other countries on the East Atlantic flyway.

¹. Nature Positive. A Global Goal for Nature. www.naturepositive.org

OUR ROLE IN THE ENERGY TRANSITION



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BirdWatch Ireland is working on multiple fronts to ensure that nature conservation and the energy transition can coexist successfully.

Building on our research

BirdWatch Ireland is Ireland's leading charity focused on the conservation of wild birds. As an organisation, our conservation team is actively involved in seabird conservation, research and monitoring.

For many years, we have been working to gather data and information on the importance and usage of our marine environment for seabirds and waterbirds. Our work in the Irish Sea includes ringing, tagging and tracking of seabirds at key sites, Digital Aerial Surveys (DAS) and observations on the daily movements and flight lines of a range of seabirds. The latter has been part of our annual monitoring and management of key seabird colonies in the Irish Sea for more than 20 years (under contract to the National Parks and Wildlife Service).



Little Tern. Photo: Oonagh Duggan.



Roseate Terns. Photo: Brian Burke.

Active Conservation work

We have been undertaking active conservation work at several East Coast Tern colonies to support thriving populations. For example, on Rockabill Island, which hosts 85% of the European population of Roseate Terns, BirdWatch Ireland wardens undertake annual special conservation measures, including vegetation clearance and deployment of nest boxes.

Meanwhile, monitoring, ringing and the implementation of predator control methods such as fencing are some of the annual measures undertaken by wardens at the Kilcoole Little Tern Colony, where we recorded over 270 nesting pairs in 2024, the highest-ever number for the project. We also undertake annual monitoring and ringing work at the Dublin Port Tern Colony to learn more about the survival rates and movements of the Common and Arctic Terns nesting there.

Annual monitoring and ringing at Lady's Island Lake and rat eradication measures at Dalkey island are some of the many other seabird conservation activities that we engage in.

OUR ROLE IN THE ENERGY TRANSITION



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Working with partners

Whilst there is an urgent need for more research of seabird ecology in Irish waters, by communicating and collaborating with our conservation partners around the globe, we can continue to expand our knowledge on bird feeding, roosting and movement patterns, the habitats they rely on and how ORE developments can affect it all.

BirdWatch Ireland is the Republic of Ireland partner of BirdLife International, the world's largest partnership of conservation organisations with over 120 partners across the globe. Together with our BirdLife partners, we are involved in a number of meetings and projects that concern ORE and its impact on birds.

For example, BirdWatch Ireland and BirdLife International have been working together over the last year to identify Marine Important Bird and Biodiversity Areas in Irish waters. Through this work, we have identified key areas around the Irish coast that are critically important for a suite of seabirds, including some globally threatened species and species of European importance (i.e. Ireland holds 52% of the European population of Roseate Terns). These marine IBAs should be designated as Special Protection Areas for birds. In addition, this data should be used to inform ORE site selection.

BirdWatch Ireland is also working with other conservation organisations on this matter. Bats are now of concern with respect to offshore renewable energy developments. We are working with Bat Conservation Ireland on bat monitoring projects to examine offshore bat activity off the eastern and south-eastern coasts of Ireland.

Our other collaborative efforts include our participation in the Our Energy Future project with Friends of the Earth Ireland, Wind Energy Ireland and climate NGOs. The project facilitated a rich dialogue between NGOs and renewable energy associations and companies about the twin challenges of accelerating the deployment of grid, turbines and panels to decarbonise the power system in line with climate science while also ensuring the protection of the nature.

As a founding member and proud partner of the Fair Seas campaign, BirdWatch Ireland has worked closely with Wind Energy Ireland to advocate for the immediate publication of Marine Protected Areas legislation. The collaboration with Wind Energy Ireland is not a formal one, nor does it influence or shape the policy positions of BirdWatch Ireland, but rather it is an opportunity to work together on matters of shared concern.



Black Guillemots. Photo: Laura Glenister.

OUR ROLE IN THE ENERGY TRANSITION



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Influencing policy

Our policy and advocacy team are active stakeholders contributing to marine conservation at a national and EU level. We are proud members of Birdlife International, the Irish Environmental Network, Stop Climate Chaos, and the Sustainable Water Network, and a founding partner of the Fair Seas coalition. We regularly make submissions to government consultations on environmental matters – including the recent Draft ORE Future Framework Policy Statement Consultation. We also make submissions on windfarm planning applications.

When shaping the future of ORE development, it is crucial to incorporate perspectives from all sectors of society. We welcome the consultative and plan-led approach in the Designated Marine Area Plans (DMAP) process, provided new DMAP areas are located away from areas important for marine biodiversity. We also welcome that the DMAP process fosters and strengthens collaboration between the State, local communities, and key stakeholders to determine the best locations for new ORE developments.



Cormorant. Photo: Colum Clarke.



Shag. Photo: Steve Newton.

Guiding change

We recognise the need to work with impending changes in a manner that is always guided by the best science and grounded in the best available data. However, some of this vital information is currently lacking. That's why, in 2024, we partnered with several wind farm companies to undertake monitoring of populations and productivity at colonies in the Irish Sea where more data is needed. These data will be added to the UK-Irish Seabird Monitoring Programme database, which is accessible to the public upon registration. This work will inform responsible decision-making by Government on future ORE developments.

It is important to stress that this collaboration was on condition that it did not jeopardise our position as an independent conservation organisation. We have already filed submissions with An Bord Pleanála about specific ORE planning applications.

OUR APPROACH TO PROPOSED ORE PROJECTS



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We are often contacted by members of the public seeking our stance on proposed offshore wind projects. Our answer in short: it depends. It is clear that ORE developments will be critical to meet our national and European climate goals, as well as providing social and economic benefits. However, these must not be compromised by poor planning and lack of due diligence when it comes to environmental impacts. There needs to be a very context-specific approach taken for each development proposal, which considers the impacts, including the cumulative impacts, on marine biodiversity, together with the impacts on local communities. All decisions should be backed by the latest and most robust science and thorough ecological assessment, and the strict application of EU environmental law especially the Birds and Habitats Directives.

At BirdWatch Ireland, we envision an Ireland where birds and biodiversity thrive in healthy habitats with secure food sources, and where their vital contributions to environmental health, human well-being, and the economy are fully recognised and valued. Getting there requires collaboration across all sectors and a strong will to protect biodiversity, increase green energy production and working with local communities.

