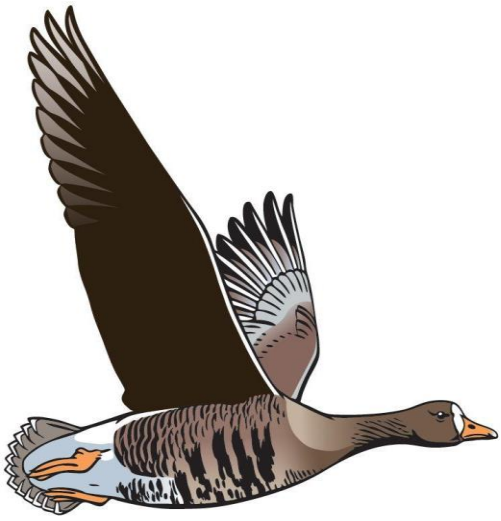

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Public Consultation for Transboundary Environmental Impact Assessment (EIA) – Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea

A submission by staff at BirdWatch Ireland

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Introduction

BirdWatch Ireland is Ireland's leading charity focused on the conservation of wild birds. Established in 1968, we currently have over 15,000 members and supporters and a local network of over 30 branches nationwide. As an organisation, our conservation team is actively involved in seabird conservation, research, and monitoring. Our policy and advocacy team are active stakeholders contributing to marine conservation at a national and EU level. We are the Irish partner of Birdlife International and are members of the Irish Environmental Network, Stop Climate Chaos, and the Sustainable Water Network, and a founding partner of the Fair Seas coalition.

Our vision is that Ireland should become a world leader in marine conservation and the sustainable management of our marine environment. The protection and restoration of Ireland's biodiversity is vital, and rapid decarbonisation is an essential element of this process. BirdWatch Ireland therefore supports the production of renewable energy and offshore wind to help achieve this. However, offshore renewable energy (ORE) devices and infrastructure must be sensitively located to minimise negative impacts on marine and terrestrial ecosystems, and on seabirds in particular as these may be more impacted than other taxa.

Ireland's Seabirds

Ireland's marine environment plays host to a huge diversity of ornithological life year-round. In summer, our offshore islands and cliffs host seabird breeding colonies, many of which are of international importance or regional significance. In winter, our coasts and estuaries are of huge importance for wintering waterbirds. Seabirds, as top marine predators exposed to all threats affecting the ocean, are excellent biodiversity indicators, providing us with an insight into the health of, and pressures facing, our marine environment [1].

However, 23 of 24 breeding seabirds in Ireland are either Red or Amber listed Birds of Conservation Concern [2]. They are highly vulnerable, facing current pressures and future threats, including (ranked in order of frequency of occurrence) [3].

- Bycatch and incidental killing (due to fishing and hunting activities) [4]
- Desynchronisation of biological/ecological processes due to climate change
- Decline or extinction of related species (e.g. food source/prey, predator/parasite, symbiote, etc.)
- Other invasive alien species (other than species of Union concern).
- Potential impacts from wind, wave and tidal power, including the associated infrastructure

Even though Ireland has designated a network of Special Protected Areas (SPAs) at coastal sites aimed at protecting the most important areas for breeding seabirds, trends in population

and range for some species are declining [5]. At a European level, of the 24 seabird species regularly breeding in Ireland, nine are declining (Atlantic puffin *Fratercula arctica*, Black-headed gull *Larus ridibundus*, European herring gull *Larus argentatus*, European shag *Gulosus aristotelis*, Fulmar *Fulmarus glacialis*, Great black-backed gull *Larus marinus*, Kittiwake *Rissa tridactyla*, Little tern *Sternula albifrons*, and Mediterranean gull *Larus melanocephalus*) and an additional four have an unknown population trend (Black guillemot *Cepphus grylle*, European storm petrel *Hydrobates pelagicus*, Leach's storm petrel *Hydrobates leucorhous*, and Manx shearwater *Puffinus puffinus*) [6]. Nationally, of these 24 species, two species are declining in Ireland (Atlantic Puffin and Kittiwake) with an additional two species (Arctic tern *Sterna paradisaea* and Common tern *Sterna hirundo*) facing probable declines due to Highly Pathogenic Avian Influenza (HPAI) H5N1 since last census; population trends for a further three species (European Shag, Fulmar, and Great cormorant *Phalacorax carbo*) are unknown [5 and Pers Comm Dr. Steve Newton, Senior Seabird Conservation Advisor, BirdWatch Ireland October 8th 2024]. Due to the sensitive nature of these populations, special consideration should be given to the potential effects of offshore developments on these seabird species. In particular, the cumulative effects of multiple developments must be adequately assessed.

For many years BWI has 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 tagging and tracking of seabirds at key sites, Digital Aerial Survey (DAS) work 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 (largely under contract to the National Parks and Wildlife Service (NPWS)). BirdWatch Ireland therefore has a unique understanding of the importance of the Irish Sea for seabirds and the possible impacts of new offshore windfarm developments.

The main impacts of ORE windfarm projects on seabirds and waterbirds include displacement, disturbance, and collision risks. However, there are a range of other possible impacts, including:

- Barrier effects: wind turbines and structural development can interfere with birds foraging and migration routes, potentially increasing their individual energy expenditure and limiting the available habitat
- Cumulative impacts: how are the cumulative impacts being examined? We are extremely concerned that the cumulative impacts of all current and future ORE projects in the Irish Sea are not being assessed
- Wider ecological impacts on fish stocks/prey base and its impact on fishing effort and location: Knowledge of the impact on the prey base/fish stocks is essential to be able to fully assess the impacts on seabirds. How will fishing efforts be shifted and what is the likely impact of such a shift on seabird foraging opportunities? Particular consideration should be given during construction and post-construction on how the additional disturbance and new structures within the marine environment may change prey location and numbers

- Impacts on non-seabird species, waterbirds and other larger birds using the air space: The flight heights are not known for key species and this data has not been collected, as many digital aerial surveys don't collect height data.

Transboundary Environmental Impact Assessment (EIA) Public Consultation– Morgan and Morecambe Offshore Windfarms Transmission Assets development, located in the Irish Sea

We appreciate the opportunity to comment on potential transboundary effects on Irish seabirds and the integrity of the Irish Natura 2000 network from development outside the territorial waters of Ireland's EEZ. There is no overall marine spatial plan for the Irish Sea, but rather six different plans from different jurisdictions at different stages of implementation. We are unclear if there is coordinated strategic planning about locations of United Kingdom (UK) offshore windfarms and nor are we clear if there have been any discussions with the Irish government on its plans for ORE and the protection of Ireland's marine biodiversity in the Irish Sea. As a whole, the Irish Sea is a unique and interconnected ecosystem and should be managed as such, with the range and habitats of many seabird species crossing multiple borders within it. Ensuring transboundary communication and collaboration as multiple governments look to increase and implement more offshore renewable processes is key to ensuring that the cumulative effects of multiple projects do not negatively impact important marine species, including seabirds, and that the marine plans for one region do not undermine the management or ecosystem health of another.

Many of the seabird species mentioned in the Transboundary Screening report for the Morgan and Morecambe developments are species of special conservation interest that triggered the designation of the many Special Protection Areas (SPAs) within the Republic of Ireland's portion of the Irish Sea. Additionally, we have identified a number of Important Bird and Biodiversity Areas (IBAs), which are of particular importance for the conservation of wild birds and their habitats, near to the proposed developments as well [7]. While IBAs do not afford legal protection to a site, they are identified using a globally agreed standardised set of data-driven criteria and thresholds. In 2024, BirdWatch Ireland, working with BirdLife International, completed the identification of a network of colony and marine IBAs in Ireland's Exclusive Economic Zone (EEZ) [8]. Within these sites, the species identified as qualifying interests occur in regionally or nationally significant numbers [7]. The sites generally also support other important populations (though they may not meet the thresholds for IBA designation), highlighting how these IBAs represent the most important areas for breeding and foraging seabirds in our waters. During this process, 24 marine IBAs and 49 colony IBAs were identified (see Figure 1 and 2 respectively); The shapefiles for these sites can be requested through BirdLife on https://datazone.birdlife.org/country/ireland/ibas.

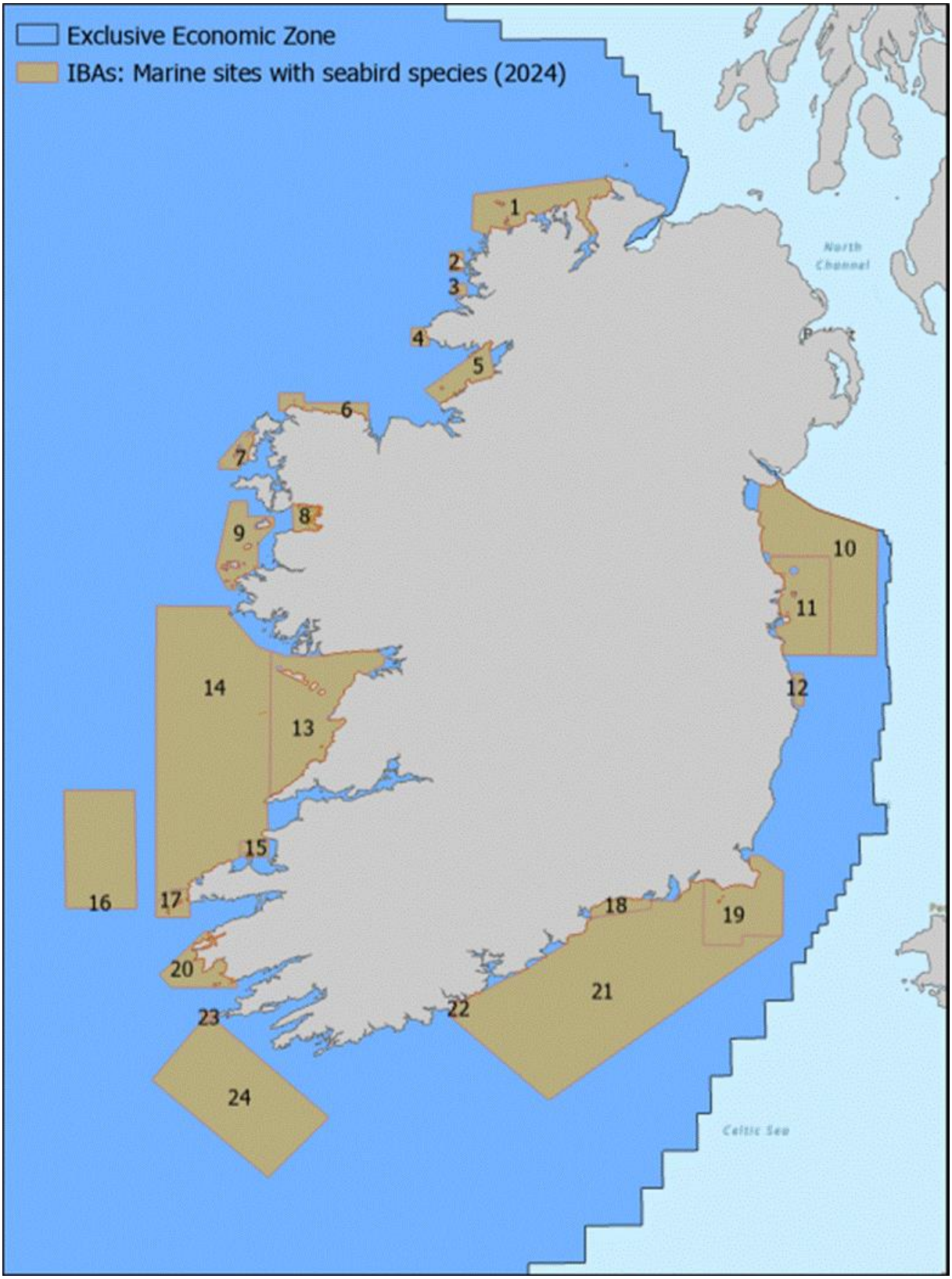

Figure 1: Ireland's marine IBA network of 24 sites.

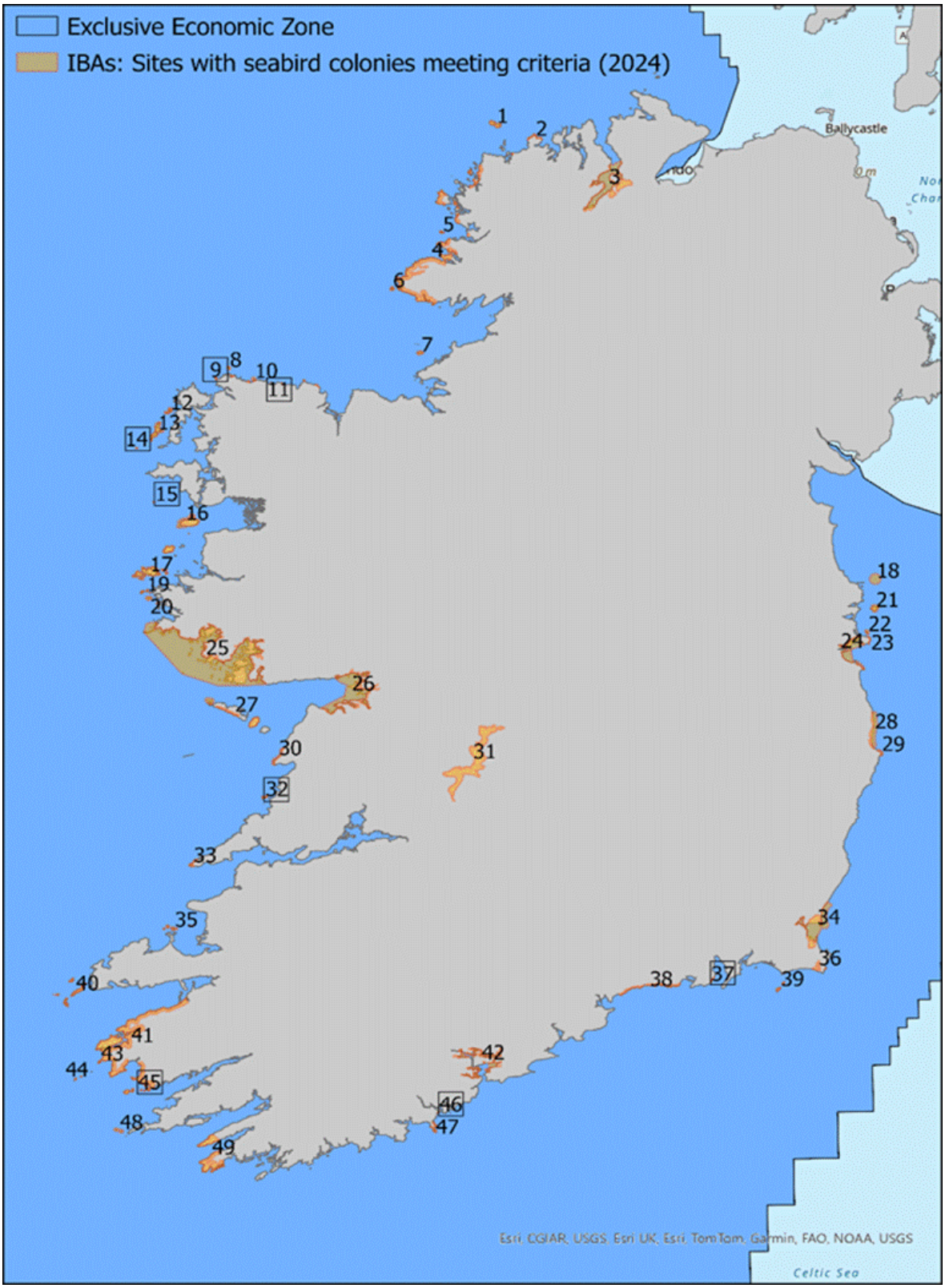

Figure 2: Ireland's colony IBA network for 49 sites. Sites with squares around them are newly identified, where sites without were previously identified and have been updated in 2025.

Specific IBAs near to the Morgan and Morecambe offshore windfarm proposed locations and transmission asset development that could be affected by transboundary impacts of the development include three marine IBAs and five colony IBAs (Table 1).

Table 1: The three Irish marine IBAs and five Irish colony IBAs near the proposed Morgan and Morecambe offshore windfarm developments and the transmission asset development, with information on the seabird species present at each IBA, including qualifying interest species used in designating the IBAs and other species also present within these IBAs that did not meet criteria for use in designation [8]

Type of IBA	**Name of IBA (Map reference number)**	**Qualifying Interest Species (meet designation criteria)**	**Other Species Present**
Marine	Northwest Irish Sea (10)	Black-legged kittiwake, Manx shearwater, Northern gannet (*Morus bassana*), Razorbill (*Alca torda*), Waterbirds, Auks (Guillemot and Razorbill)	Arctic tern, Atlantic puffin, Black guillemot, Black-legged kittiwake, Common guillemot (*Uria aalge*), Common gull (*Larus canus*), Common tern, European herring gull, European shag, Great black-backed gull, Great cormorant, Lesser black backed gull (*Larus fuscus*), Manx shearwater, Northern fulmar, Roseate Tern (*Sterna dougallii*)
Marine	Dublin Islands and cliffs marine extension (11)	Atlantic puffin, Auks (Guillemot and Razorbill), Black guillemot, Black-legged kittiwake, Common guillemot, Common tern, European herring gull, European shag, Great black-backed gull, Great cormorant, Manx shearwater, Northern gannet, Razorbill, Roseate tern	Arctic tern, Common gull, Lesser black-backed gull, Manx shearwater, Northern fulmar, Black-backed gull
Marine	Wicklow Murrough marine extension (12)	Little tern, Auks (Guillemot and Razorbill)	
Colony	Rockabill (18)	Black guillemot, Black-legged kittiwake, Common tern, Roseate tern	Arctic tern
Colony	Lambay Island (21)	Atlantic puffin, Black-	Black guillemot, Common

		legged kittiwake, Common guillemot, European herring gull, European shag, Great black-backed gull, Great cormorant, Northern gannet, Razorbill	gull, Lesser black-backed gull, Manx shearwater, Northern fulmar
Colony	Ireland's Eye (22)	Atlantic puffin, Black-legged kittiwake, European herring gull, Great black-backed gull, Great cormorant, Razorbill	Common guillemot, European shag, Lesser black-backed gull, Northern fulmar, Northern gannet
Colony	Howth Head (23)	Black-legged kittiwake	Black guillemot, Common guillemot, European herring gull, European shag, Northern fulmar, Razorbill
Colony	Dublin Bay (24)	Common tern	Arctic tern, Black guillemot, European herring gull, Great black-backed gull, Lesser Black-backed gull

Many of the designating species for the nearby Irish IBAs are among the species most likely to be present within the Morgan and Morecambe Transmission Assets development area and were frequently recorded in both windfarm's surveys. Due to the migratory nature of seabirds and the large size of their ranges make it possible that these populations of seabirds intermix and are inter-connected between the countries and could be spending time within the Morgan and Morecambe marine development areas.

While we understand that the Morgan and Morecambe Transmission Asset development Transboundary reports and screenings found '*no potential for significant transboundary effects with regard to offshore ornithology from the Transmission Assets upon the interests of other states*', we at BirdWatch Ireland have the following concerns, which we believe should be addressed. We stress that these may not be comprehensive, as additional concerns could arise as our knowledge increases and/or seabird populations change over time. We have labeled each concern and offered a brief summary of the concern before more in-depth discussion to aid in navigating through our response.

1. **Lack of consideration for multiple tern species and the connectivity between Irish and UK breeding colonies**

For both Common and Arctic tern, additional assessments within this transboundary EIA were not carried out due to '*species only {being} present in limited numbers, {with} no SPA connectivity*'. Additionally, Roseate terns in Ireland are not assessed in any of the Morgan and

Morecambe Transmission Assets development documentation, despite Rockabill, a nearby Irish SPA and IBA, hosting the largest colony of Roseate terns in Europe. The majority of the North West European population is found at just three colonies: Rockabill SPA (Dublin), Lady's Island Lake SPA (Wexford), both in the Irish Sea, and Coquet Island SPA (Northumberland) in the English North Sea. Together these sites act as a metapopulation; Rockabill is the main source population and the other two are more often sinks (habitats with net population decline), especially when the subpopulations nesting at Coquet and Lady's Island Lake were lower and 'recovering' [9]. This situation may be recurring now given the recent (2022-23) outbreak of HPAI-H5N1 that disproportionately impacted Coquet Island SPA. There is continual inter-connection between the three, with individuals moving between the colonies in the pre- and post- breeding season [10]. Therefore, impacts to the Rockabill SPA and the terns breeding there could have secondary effects on the other colonies Rockabill SPA supports through the export of breeding birds.

Significantly, the movement (autumn/spring migration) of Roseate terns to and from Coquet Island is largely oriented northeast-southwest overland (Northern England) rather than via the sea corridor of the North Sea [10]. The majority of tagged birds are passing through the northeast Irish Sea lying between the Isle of Man, Cumbria and North Wales, with several moving through Morecambe Bay itself where this development will be taking place (see Figures 3 and 4 below). This research clearly illustrates the importance of the Irish Sea for Roseate terns moving between these three colonies.

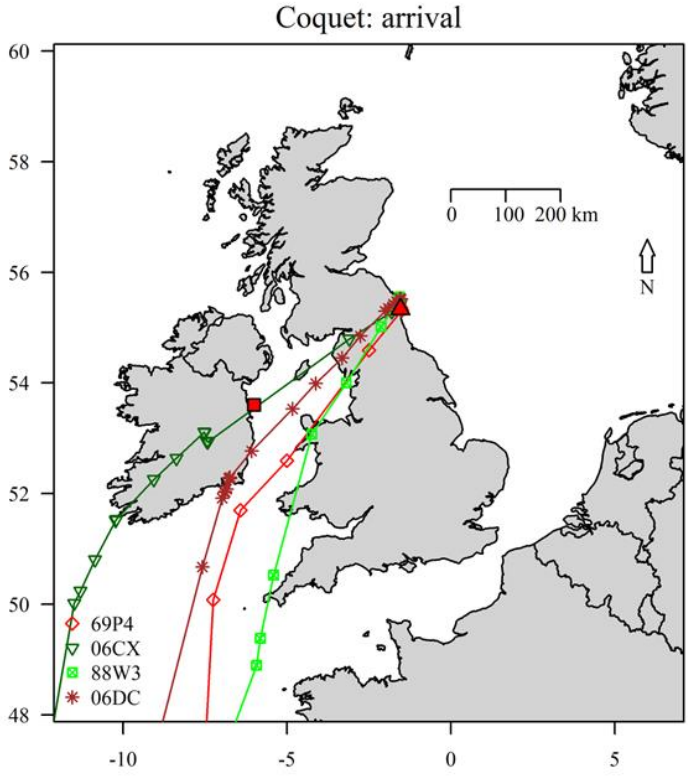

Figure 3: Tracking data on the arrival routes of 4 individual Roseate terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration [10].

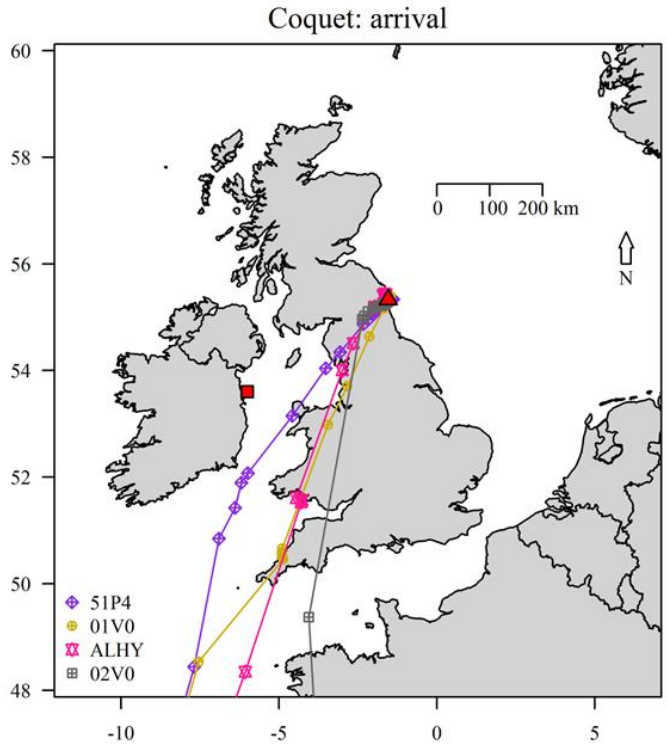

Figure 4: Tracking data on the arrival routes of an additional 4 individual Roseate terns to Coquet Island SPA that show use of the Irish Sea and Morecambe Bay in migration [10].

We are concerned that this internationally important and rare European Red-listed species was not identified as a species of interest and at risk in the surveys, literature reviews, consultations and environmental assessments of this project. BirdWatch Ireland finds this a significant oversight and would request that the impacts of the Morgan and Morecambe projects and their transmission asset development considers impacts to Roseate Terns and the connections between these important colonies.

Also, we know from geolocator tracking data for Arctic terns that the Irish Sea is an important staging area for birds leaving the UK in autumn (August-September) and arriving in spring (see Figure 5 below) [11].

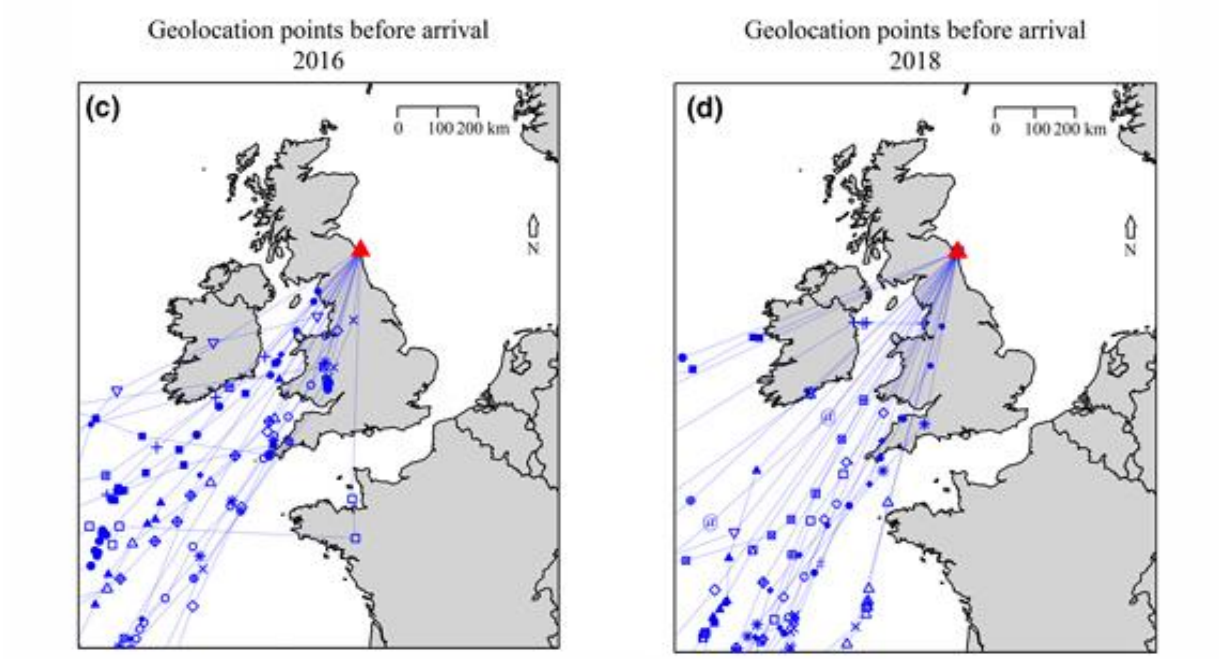

Figure 5: Tracking of the arrival routes of Arctic terns to Coquet Island SPA in 2016 and 2018 that show use of the Irish Sea and Morecambe Bay in migration [11].

Redfern *et al.* (2020b) refers to overland migration of Arctic terns heading to and from the large Northumberland colonies of the Farne Islands and Coquet Island SPA, where the birds were tagged. As geolocator accuracy may be up to +/- 50 km, these birds may well be using Morecambe Bay coastal waters at some stage. Additionally, terns from elsewhere such as the UK are also recorded in Ireland in the post-breeding season [12]. Birds with UK rings have been frequently recited in Dublin Bay in the autumn months, emphasising the fact that UK terns cross the Irish Sea and stage in Ireland before migration [Pers Comm Brian Burke, Senior Seabird Conservation Advisor, BirdWatch Ireland April 7, 2025]. With several windfarms are already operating in this part of the Irish Sea, we would request that further assessment be done for Arctic Terns in the Irish Sea due to their migration patterns which could put them at risk of displacement from offshore energy development including Morgan and Morecambe

2. **More consideration and assessment needed for Irish offshore windfarm development in cumulative impacts**

Within the cumulative screening matrix for the Morgan and Morecambe Transmission Asset development, all Irish offshore windfarm projects were not screened in for further assessment either due to '*low data confidence*' or '*no conceptual or physical effect-receptor pathway*' for offshore ornithology concerns. While we understand the methods undertaken for this matrix and that each development was assessed individually, this essentially means that no Irish offshore windfarm projects were included in cumulative impact assessments. Given the amount of

potential offshore windfarms in the relatively small area of the Irish Sea (see Figure 6 below), we believe that this is inappropriate.

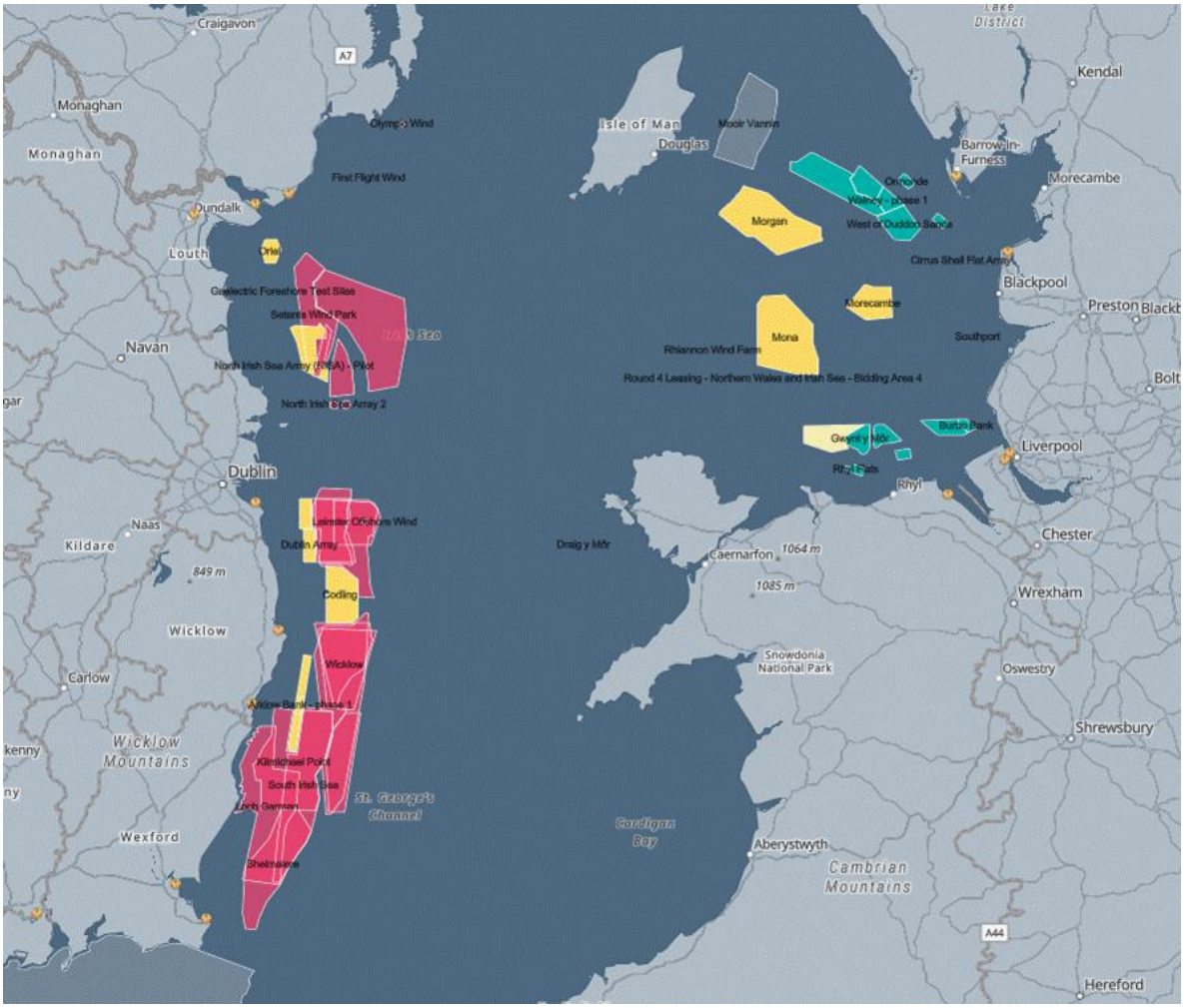

Figure 6: Map of proposed offshore windfarms within the Irish Sea from both the Republic of Ireland and the UK, as taken from the 4C Offshore website [13]

Birds don't recognize boundaries, and many seabirds utilize breeding sites, foraging areas and migratory routes on both sides of the border. These intermixed and inter-connected seabird populations should be further studied in order to understand how transboundary impacts could affect the overall populations of seabirds utilizing these waters. Many such initiatives are already in place, such as the Seabird Monitoring Programme, which has stakeholders from government and NGO sectors across the UK and Republic of Ireland. BirdWatch Ireland works closely with our BirdLife International partner, the Royal Society for the Protection of Birds (RSPB), collaborating on a range of projects. All of the Phase I Irish projects within the Irish Sea have completed and published their Environmental Impact Assessment Reports (EIAR) with An Bord Pleanala, Ireland's national independent planning body [14]. These EIARs are publicly available and can be used in conjunction with the assessments from Morgan and Morecambe to assess

potential cumulative impacts from increased offshore development on both sides of the Irish Sea on seabirds. We would request that future cumulative impacts include all proposed wind farm developments within the Irish Sea, including those in the Irish EEZ, in order to have a more comprehensive understanding of the totality of the potential impacts to seabirds utilizing this interconnected marine ecosystem.

3. Potential long-term impacts to seabird populations, even after decommissioning

Within the Transboundary screening report for the Morgan and Morecambe Transmission Assets development, it is stated that '*the effects are likely to be reversible following decommissioning of the offshore infrastructure*'. While we understand that for some immediate and localized impacts, such as disturbance and displacement, this would be accurate, there is still the potential that other impacts, such as mortality, could continue to affect seabirds after decommissioning. Impacts like mortality, which can be caused by displacement or changes in prey (both of which are potential transboundary impacts listed in these reports), can impact seabird populations by decreasing the amount of breeding individuals available. Due to the long lives of seabirds, it can be a long time before impacts to seabird populations can be seen at both the local, national, and international levels. Given the long time it can take for operational impacts to be seen within seabird populations, there is the possibility that effects from operational impacts could continue long after decommissioning and could potentially cause irreversible damage given the declining populations of many of Ireland's seabirds. For this reason, this statement is inaccurate and does not take into account seabird life traits or the potential for long-term effects of operational impacts on seabird populations.

Conclusion:

With an increase in the amount of proposed renewable development in the Irish Sea, from within Ireland and outside Irish borders, transboundary impacts and the cumulative effect these projects may have on birds needs to be better understood and planned for. The migratory nature of seabirds and the large size of their ranges make it possible that the populations of seabirds within the Irish Sea intermix and are inter-connected between the countries; this should be further studied in order to understand how transboundary impacts could affect the overall populations of seabird species utilizing these waters. Given the amount of offshore renewable development planned in the Irish Sea, we at BirdWatch Ireland appreciate that this transboundary consultation was offered and would ask that more comprehensive transboundary assessments are completed before the application goes any further.

In the Irish waters of the Irish Sea, several windfarm developments are being proposed, and along with other offshore wind developments in UK waters including Morgan and Morecambe, there is a very genuine possibility that cumulative effects of all these new wind developments could be a serious threat to seabirds that utilize the marine environment. We fear that assessing each development individually and within a bubble without a cumulative assessment of the totality of all the proposed developments within the Irish Sea risks missing or underestimating

impacts to birds and the marine environment and could negatively affect seabirds in the entire Irish Sea marine environment regardless of country boundaries.

From the evidence presented to us in the supporting documents to the application for the Morgan and Morecambe Transmission Assets development, we would ask that further investigation is done to ensure that adverse impacts do not affect the conservation interests of Irish seabirds.

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