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BirdWatch Ireland observation to Natural EirGrid Powering Up Offshore- South Coast Step 3 Consultation

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*, Kittiwake *Rissa tridactyla*, European herring gull *Larus argentatus*, European shag *Gulosus aristotelis*, Great black-backed gull *Larus marinus*, Little tern *Sternula albifrons*, Mediterranean gull *Larus melanocephalus*, and Fulmar *Fulmarus glacialis*) 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 are declining in Ireland (Atlantic puffin and Kittiwake) with an additional two species facing probable declines due to Highly Pathogenic Avian Influenza (HPAI) H5N1 since last census (Arctic tern *Sterna paradisaea* and Common tern *Sterna hirundo*); population trends for a further three species (Great cormorant *Phalacorax carbo*, European Shag, and Fulmar) are unknown [5 and Pers Comm Dr. Steve Newton, Senior Seabird Conservation Officer, 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 BirdWatch Ireland 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 species. The latter in particular has been part of our annual monitoring and management of key seabird colonies in the Irish Sea for more than 20 years (carried out 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 on their populations.

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 and Celtic Seas are not being adequately 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 to 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.

BirdWatch Ireland observation to Natural EirGrid Powering Up Offshore- South Coast Step 3 Consultation

We at BirdWatch Ireland welcome the opportunity to offer our observations to this consultation on the best options for Landfall Zones and Grid Connection Zones of offshore cables for section A of the South Coast Designated Maritime Area Plan (SC DMAP), Tonn Nua. We have organised our response by area of the two landfall locations, calling the Cork Harbour landfall 'Zone 1' and the Wexford/Waterford location 'Zone 2'. In our response below, we have highlighted concerns with some of the proposed landfall locations and our recommendations for site selection. We stress that these issues are not comprehensive, as this is at the consultation stage and no surveys for an EIA or AA have been done yet for us to read and address, and additional concerns could arise as our knowledge increases and/or bird populations change over time.

Within our response, we will refer to Important Bird and Biodiversity Areas (IBAs). BirdLife International maintains a global database of IBAs, sites which are of particular importance for the conservation of wild birds and their habitats [7]. While IBAs do not afford legal protection to a site, they are identified using a globally agreed standarised 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, including Irish waters. As this consultation is about landfall location of offshore cables, we will refer to the relevant colony IBAs from the 52 colony IBAs that have been identified, some of which are new and others which existed before but have been updated with additional data and new information on nesting seabirds (Figure 1; these sites will shortly be available on https://datazone.birdlife.org/country/ireland/ibas).

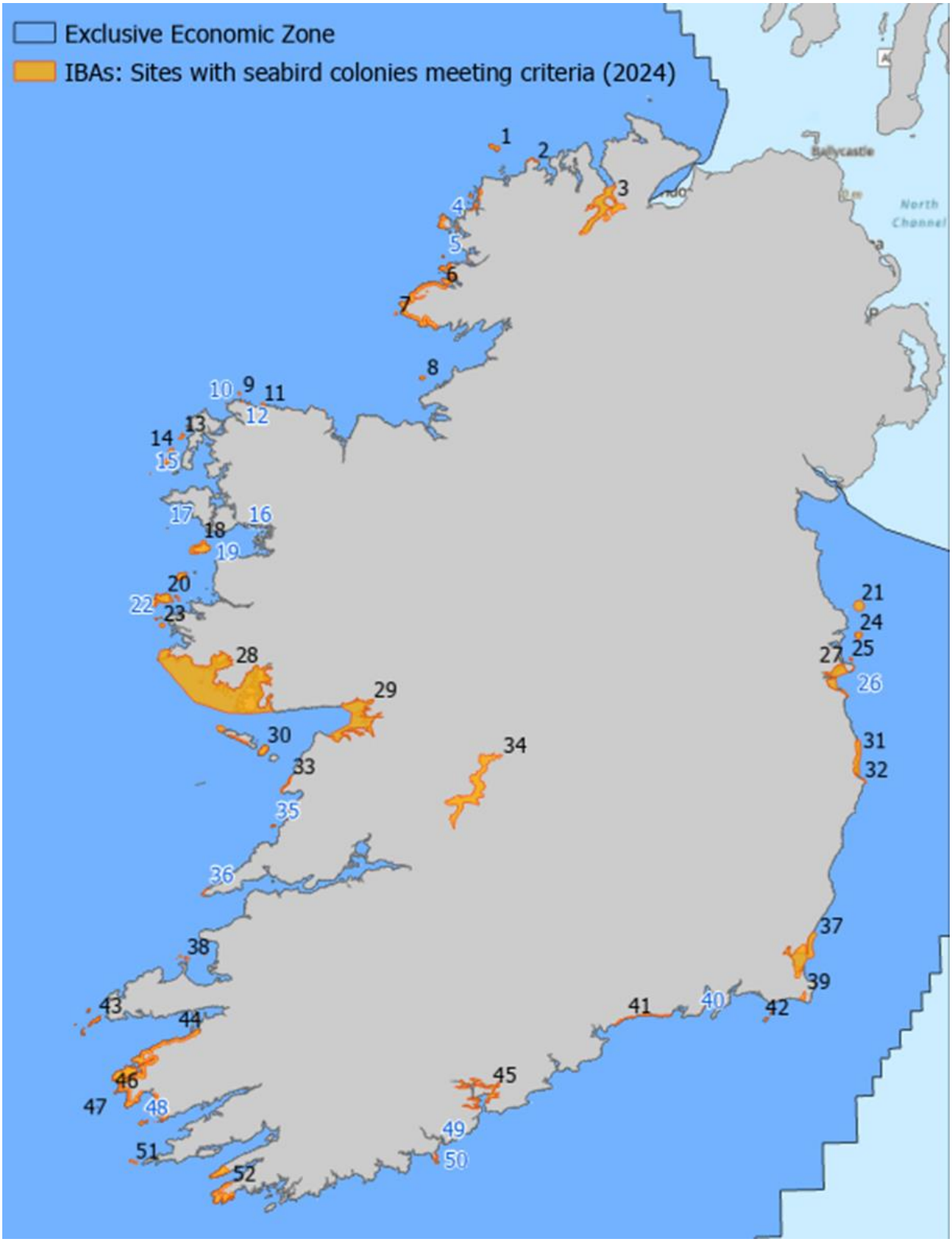

Figure 1: Ireland's colony IBA network for 52 sites. Sites with blue numbers are new IBAs, where sites with black numbers were previously identified and have been updated in 2024.

Within these sites, the species identified as qualifying interests are breeding in regionally or nationally significant numbers [7], though often additional species are breeding in the same area that do not meet IBA criteria, highlighting the importance of these colony locations for many different species of seabirds breeding in Ireland.

Zone 1: Cork Harbour Landfall

We have two main concerns with regard to Zone 1 that we wish to be addressed during landfall location selection. The first is that site C is located within an important area for wintering waterbirds. The Irish Wetland Bird Survey (I-WeBS), which are coordinated by ourselves at BirdWatch Ireland and funded by NPWS, is the national monitoring scheme for over 50 species of wintering waterbirds within Ireland [8] and surveys at a site near/on site C show a large number of species and individuals wintering there (Table 1).

Table 1: Wintering waterbird species seen at I-WeBS site Ballycotton Shanagarry, which relates to site C for EirGrid landfall, with a mean of over 10 individuals from 2016/17 to 2020/21, their conservation status within Ireland, and the month(s) in which the peak number of individuals per species was counted.

Species	**Status (Amber or Red listed in Ireland)**	**Mean (2016/17 - 2020/21)**	**Peak Months**
Bar-tailed godwit (*Limosa lapponica*)	Red	45	Jan, Dec
Black-headed gull	Amber	491	Oct
Black-tailed godwit (*Limosa limosa*)	Red	155	Oct
Common gull (*Larus canus*)	Amber	131	Jan
Great cormorant	Amber	11	Oct
Curlew (*Numenius arquata*)	Red	315	Feb
Dunlin (*Calidris alpina*)	Red	280	Jan, Dec
Golden plover (*Pluvialis apricaria*)	Red	564	Jan, Feb, Nov, Dec

Great black-backed gull		120	Feb
Greenshank (*Tringa nebularia*)		16	Feb
Grey plover (*Pluvialis squatarola*)	Red	31	Jan, Feb, Dec
European herring gull	Amber	195	Sep
Knot (*Calidris canutus*)	Red	16	Oct, Dec
Lapwing (*Vanellus vanellus*)	Red	478	Jan, Dec
Lesser black-backed gull (*Larus fuscus*)	Amber	664	Sep
Light-bellied brent goose (*Branta bernicla hrota*)	Amber	89	Mar
Little egret (*Egretta garzetta*)		15	Sep
Mallard (*Anas platyrhynchos*)	Amber	58	Sep
Oystercatcher (*Haematopus ostralegus*)	Red	200	Oct
Redshank (*Tringa totanus*)	Red	79	Jan, Oct
Ringed plover (*Charadrius hiaticula*)	Amber	110	Oct
Sanderling (*Calidris alba*)		113	Feb
Sandwich tern (*Sterna sandvicensis*)	Amber	38	Sep
Shelduck (*Tadorna tadorna*)	Amber	36	Feb
Snipe (*Gallinago gallinago*)	Red	34	Nov, Dec

Teal (*Anas crecca*)	Amber	519	Dec
Turnstone (*Arenaria interpres*)	Amber	61	Dec
Wigeon (*Mareca penelope*)	Amber	222	Dec

Table 1 only shows species that were surveyed with a mean count of over 10 individuals from 2016/17 to 2020/21, and other species were also surveyed in lower numbers, highlighting the importance of this site to a wide variety of different wintering waterbirds. A majority of these species are also birds of conservation concern within Ireland, either being amber-listed (medium conservation concern) or red-listed (high conservation concern) [2]. Additionally, the peak months vary and span the entirety of the wintering survey period, showing the importance of the site throughout the winter. Due to the heavy use of this site by wintering waterbirds, we would recommend that site C is not selected as the landfall location for this zone.

In regard to landfall location sites A and B, we do not have any specific concerns with these two locations but would ask for caution in construction and cable burying operations as this area is close to the Cork Harbour colony IBA (45). As seen in Figure 1, this IBA has locations on both sides of the Cork Harbour, so it is important to be aware and exercise caution while conducting construction near this IBA. This IBA is designated for nesting Common terns and also contains nesting Great black-backed gulls, though they did not meet criteria for designation. Common terns were greatly affected by 2023's HPAI-H5N1 outbreak. On breeding colonies throughout Ireland, including Dublin Port, Rockabill SPA, and other colonies monitored by BirdWatch Ireland, a decrease of approximately 50% was noticed in 2024 and it is assumed that the Irish breeding population of Common terns is now significantly lower than previous estimates made before the effects of HPAI-H5N1 mortality could be seen [9; Pers Comm Dr. Steve Newton, Senior Seabird Conservation Officer, BirdWatch Ireland November 10th 2024]. For this reason, we would ask that extra caution and consideration is taken to avoid impacts to nesting Common terns as they continue to recover. We would also recommend that works be done outside the breeding season to avoid potential disturbance to nesting seabirds including Common terns.

In summary, we would therefore recommend that site C is not selected within Zone 1 and either sites A or B are selected for the landfall location within this zone, though we recommend that works proceed cautiously at these site locations due to their importance to nesting seabirds.

Zone 2: Wexford/Waterford Landfall

In regard to Zone 2, Wexford/Waterford landfall, we would suggest that site D is not selected as the landfall location for this zone. Site D is within the Mid-Waterford Coast colony IBA (41),

which was designated for nesting European herring gulls but also contains nesting Black guillemot, Common guillemot (*Uria aalge*), European shag, Great black-backed gull, Great cormorant, Lesser black-backed gull, Northern fulmar, and Razorbill (*Alca torda*) which did not meet criteria. As mentioned above, the European herring gull and European shag are experiencing declining population trends within Europe, highlighting the importance of conserving regionally important breeding grounds for these species. Additionally, population trends for the Great cormorant, European shag, and Northern fulmar are unknown in Ireland and therefore their breeding sites should be treated with caution to limit any possible negative impacts until these Irish populations are better understood.

Additionally, we would suggest that site E is also not selected as it is a potentially important habitat for Chough (*Pyrrhocorax pyrrhocorax*). Chough is an amber-listed species at an all-Ireland level and have seen long-term population declines within the island [10]. Surveys done by NPWS in 2021 confirmed 11 pairs and an additional 11 pairs probable within Waterford and Wexford, which includes the Mid-Waterford Coast SPA designated for Choughs [10]. Given the species habitat preferences, we feel that site E is the most likely to be preferential for the species compared to the other site locations. Despite the national population appearing to be stable, there are some areas where the populations are declining and their threatened status remains amber, so consideration and caution to avoid impacting Chough habitat and populations should be considered.

In summary, we would therefore recommend that sites D and E are not selected within Zone 2 and either sites F or G are selected for the landfall location within this zone.

Conclusion

Given the information provided by EirGrid for this consultation, we at BirdWatch Ireland recommend that sites A or B are selected for zone 1 (Cork Harbour) and sites F or G are selected for zone 2 (Wexford/Waterford) to limit the potential negative impacts of construction associated with the landfall of offshore cables to nesting and wintering bird habitats. As the process for linking the offshore cables from the SC DMAP to land-based connection sites continues, and more surveys and assessments are done, we look forward to continuing to address any potential impacts to birds and working collaboratively to ensure that effects to birds and other biodiversity are considered and minimised in Ireland’s offshore renewable development.

References

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