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BirdWatch Ireland submission on proposed development of Rosslare Euro port Offshore Renewable Energy (ORE) Hub

A report 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, in which the protection and restoration of Ireland's biodiversity is vital.

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 apex marine feeders, are exposed to all threats affecting the ocean and 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 show that some species are in decline [5]. Due to the sensitive nature of these populations, special consideration should be given to the potential effects of marine activities on these seabird species. In particular, the cumulative effects of multiple types of activities and developments within the marine environment 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, including tagging and tracking of

seabirds at key sites, Digital Aerial Survey (DAS) work, observations on the daily movements and flight lines of a range of species, annual monitoring and management of key seabird colonies for more than 20 years (carried out largely under contract to the National Parks and Wildlife Service (NPWS)), advocacy for increased protections and concise management plans for seabirds, and responding to consultations regarding proposed offshore developments in Irish and UK waters that have the potential to seriously impact Irish seabirds. BirdWatch Ireland therefore has a unique understanding of the importance of Ireland for birds and the possible impacts of continuing and increasing marine activities on their populations.

BirdWatch Ireland submission on proposed development of Rosslare Europort Offshore Renewable Energy (ORE) Hub

We at BirdWatch Ireland welcome the opportunity to respond to the proposed development of Rosslare Europort Offshore Renewable Energy Hub (hereby referred to as Rosslare Europort ORE Hub) and the associated documents provided in conjunction with the draft. We have grouped our comments into three main categories: 1) general concerns regarding the potential impacts of Rosslare Europort ORE Hub development on birds, 2) comments on the mitigation for birds mentioned and planned in the documents, and 3) more information on BirdWatch Ireland's Important Bird and Biodiversity Areas (IBAs) and how they related to the proposed development of Rosslare Europort ORE Hub.

1. General concerns on the proposed development of the Rosslare Europort ORE Hub's potential impacts on birds

We appreciate that birds on land, the coast, and the sea are considered within *Chapter 14 Ornithology* of the EIAR for potential impacts of the proposed development of Rosslare Europort ORE Hub. While we agree with the assertions that the construction and expansion for this proposed development is already a heavily modified and anthropogenic habitat, and birds using the area are likely habituated to the activities currently present, the expansion of the port for the Rosslare Europort ORE Hub will be a significant addition and change to current activities that could impact the behavior of birds in the area. Overall, we feel these impacts to birds are well addressed and handled by the EIAR, NIS, and AA documents; however, there are a few concerns surrounding how birds were addressed within the documents for the Rosslare Europort ORE Hub that we would like to highlight for further study or consideration as the project moves forward.

1.1 - Need to increase the post-construction bird monitoring

It is stated in *Section 14.7 Monitoring* of *Chapter 14- Ornithology* of the EIAR that *'the bird survey programme will be based on the programme for the baseline bird surveys, with a combination of vantage point surveys and walkover surveys carried out within the site and*

offshore area for a minimum of 12 months'. While we appreciate that there are plans for monitoring for bird species after the completion of construction during the operational phase, the bird surveys should continue for more than the 12 months outlined in order to better assess the new 'normal' bird distributions for the area and account for yearly variations. Scottish Natural Heritage, an executive non-departmental public body of the Scottish Government, recommends '*a minimum of 2 years [of surveys] to allow for variations in bird use between years*' for wind farm assessments [6] and scientific research warns that reducing monitoring effort compromises the precision of trend estimates [7]. Since this is a large additional development to the existing port, and the construction period is expected to last at least 2 years, it is expected that bird distribution in the area could change considerably and at least two years of surveys is a relevant recommendation to account for yearly variation in bird species and locations within the area. Additionally, since the Rosslare Europort ORE Hub is both located within a Special Protection Area (SPA) (Seas off Wexford cSPA) and several other SPAs are nearby, this area is an important area for birds, so understanding how this construction and expansion to the existing port infrastructure is critically important to ensuring that the conservation objectives of all these SPAs are met, particularly for Qualifying Interest (QI) species. Without additional surveys over multiple years, the data collected from these post-construction surveys would be insufficient to better understand and/or make decisions on the populations of birds within the area, so we suggest that an additional year of surveying is carried out, at minimum, to better understand the changes in bird populations around the Rosslare Europort ORE Hub post-construction and make better informed decisions in the future for birds in the surrounding area, including QI species.

1.2 - Improved consideration for Common Scoters (*Melanitta nigra*) and Diver species

We appreciate that within the EIAR *Chapter 14- Ornithology* impacts Common Scoters (*Melanitta nigra*) and the diver species, Great Northern Diver (*Gavia immer*) and Red-throated Diver (*Gavia stellata*), are outlined and considered; however, we feel that these species should be considered throughout the construction and operation of the project in great detail due to their sensitivities and the potential for this development to alter the behaviour and use of this area by these species. In *Table 14.15 Summary Table of Chapter 14- Ornithology*, adverse effects are detailed for these species during construction and operation with no residual effects, but in both cases the magnitude of the impact is determined to be not significant or low respectively. While we understand how this determination was made using EIA terms and methodology, we would argue for more consideration and care to be given as there is the potential that these impacts could be stronger in reality, and the area is important to these species.

We agree that Common Scoters and divers are sensitive to disturbance, as is stated in the EIAR *Chapter 14- Ornithology* and documented in many scientific publications, and understand why impacts are not considered significant enough to warrant further action, often on the basis

of the species *'not regularly using the Proposed Development area in significant numbers'*; **however, we would highlight that Common Scoters were one of the eight species with peak numbers higher than 25 within the proposed development study area and both Common Scoters and Red-throated Divers are QI species for the Seas off Wexford cSPA, in which the Rosslare Europort ORE Hub is located [8].**

Additionally, there is research that shows a decrease in Common Scoters was still observed 2 years post-construction of an offshore wind farm with limited recovery to pre-construction distributions [9] and both Common Scoters and diver species are included as species particularly sensitive to displacement effects of offshore development in Scottish waters [10]. Given that the conservation objectives of the Seas off Wexford cSPA state that *'the favorable conservation status of a species is achieved when: ... the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis'* [8], it will be of particular importance to ensure that the Rosslare Europort ORE Hub development, which is located within the cSPA, does not impact these species by rendering the habitat around the port as unusable or displace the species permanently from the surrounding area. **For these reasons, we believe that Common Scoters and diver species should be given greater consideration and care during the Rosslare Europort ORE Hub development to ensure that impacts are limited on the species and there are no long-term impacts that impact the conservation objectives of the cSPA in which the development is located.**

1.3 - Forage fish concerns

Within *Chapter 14- Ornithology* of the EIAR, it is stated that there may be *'indirect effects as a result of temporary reduction in prey species due to disturbance to seabed during dredging'* to birds foraging in the area surrounding the Rosslare Europort ORE Hub development as *'changes to seabed habitats in the dredged area may also reduce the amount of suitable habitat and available food resource for fish and shellfish species and communities associated with the baseline substrates/sediments, which could in turn, reduce the availability of these prey fish species for foraging seabirds within the vicinity of the Proposed Development Dredge Area'*. It is important to acknowledge that changes in seabed substrate **may also permanently displace prey fish**, including core forage species such as sandeels (*Ammodytes tobianus*), due to the habitat loss and therefore alter the availability of these important prey fish for foraging and breeding birds. In fact, this potential for *'permanent (long-term) habitat loss of fish spawning and nursery grounds due to the presence of foundations and land reclamation of the seabed'* during the construction phase is highlighted in *Chapter 12- Fish, Shellfish, and Turtle Ecology* in *Table 12.8 Summary of Likely Significant Effects on Fish, Elasmobranchs, and Turtles* with sandeels being mentioned as a species that *'may be locally affected'*. Black-legged Kittiwakes (*Rissa tridactyla*) and the tern species, which are QIs of overlapping and nearby SPAs with foraging

range of the Rosslare Europort ORE Hub, rely on sandeels and other small forage fish that are common in soft substrate and may be impacted by construction and dredging. While the impact of the project are expected to be temporary, extra consideration should be given to ensure that the impact to these fish populations and their habitats is minimal in order to protect this forage supply and ensure that there are enough forage fish for the surrounding breeding colonies. **The developers will need to provide evidence that there will not be a permanent displacement of forage fish.**

We also issue caution around overestimating the ability of birds to simply move to other foraging areas or alternative prey when assessing the sensitivity of birds to this '*temporary reduction in prey availability during dredging/reclamation activities*' as low. It is stated in *Chapter 14- Ornithology* that '*most seabird species have a variety of target prey species and have large foraging ranges, meaning that they are able to forage for alternative prey species or to forage in other areas if prey become temporarily unavailable*'; however, this statement is very generalised and does not take into proper account the specialist needs of some seabirds or potential energetic costs. While some birds, such as gull species, can forage on a wide variety of different fish species, others are specialists who need a certain species of fish or can only access fish within a limited area of the water column due to diving depths [11]. These specialist species include a variety of different QI species from the overlapping and nearby SPAs in foraging range of the Rosslare Europort ORE Hub, including Black-legged Kittiwakes, Common Guillemot (*Uria aalge*), Common Terns (*Sterna hirundo*) and the other tern species. Even if birds can find additional foraging areas and/or alternative prey, this does not mean that there would not be impacts to birds and their reproductive success. Increased foraging distance to reach other foraging areas or decreased energetic content from alternative prey could have additional energetic costs that could impact both the individual bird's survival and/or their reproductive success [12]. We would urge caution around generalising the behaviour of foraging seabirds and their potential importance of this habitat to foraging species, particularly during the breeding season when their foraging ranges are more limited to areas around the breeding colonies and energetic costs are high due to breeding [13,14].

Additionally, there has been no evidence provided within *Chapter 14- Ornithology*, *Chapter 12- Fish, Shellfish, and Turtle Ecology*, or the other associated EIAR documents that there is enough and the necessary prey species in the wider area that seabirds can access and use during the construction period when the '*prey become(s) temporarily unavailable*' during dredging activities. In *Chapter 12- Fish, Shellfish, and Turtle Ecology's Table 12.9: Summary of Ecological Valuation and Evaluation of KERs within the Proposed Development Fish, Shellfish and Turtle Ecology Study Area* it is stated that '*behavioural disturbances possible including (for) ecologically and commercially important species, some of which (e.g. sandeel, herring) exhibit high sensitivity to sound or sedimentation during spawning*' and they '*may use habitats in and around the Proposed Development*'. Without information on whether there is enough suitable habitat for these prey species outside of the Rosslare ORE Hub construction area or the area

around Rosslare ORE Hub that will be impacted by noise and sedimentation that can support impacted foraging birds during the construction period, it cannot be stated that the surrounding area can support foraging birds during this time and that the impacts from construction will not be significant to foraging birds.

2. Comments on the mitigation planned in association with the Rosslare Europort ORE Hub's development

We appreciate that mitigation is already being considered and added into the development plans for both construction and operation of the Rosslare Europort ORE Hub and support the overall plans for mitigation to lessen the impacts to birds. We have a few suggestions for the mitigation plans, which we have detailed below.

2.1 - Habitat removal during the construction period

In *Chapter 14- Ornithology* of the EIAR, it is stated that '*mitigation measures for birds include conducting any construction activities that could result in habitat removal outside of the bird breeding season (March to August inclusive)*'. We support and appreciate this consideration for breeding birds, but would suggest that further care should also be taken both before and after this breeding season to account for prospecting adults and fledging/fledgling birds and request that construction activities that could result in habitat removal not be conducted from March to September to allow for these pre- and post-breeding activities. Disturbance during these pre- and post-breeding activities can cause significant impacts to breeding birds, both lowering their individual fitness, reducing reproductive success, and impacting their ability to appropriately assess habitat quality [15]. Construction activities that could result in habitat removal have the potential to greatly disturb and impact these pre- and post-breeding behaviours, as it would impact prospecting adults' ability to accurately locate acceptable breeding habitat and could impact fledging/fledgling birds' movements, as they are not as maneuverable as adults and may not be able to get away from construction activities as easily. For these reasons, we believe it would be good mitigation practice to extend the restriction on habitat removal construction activities to March through September to include these additional vulnerable pre- and post-breeding periods.

2.2 - Mitigation for potential disturbance to nesting Kittiwakes

While we appreciate and support the mitigation of providing artificial nest boxes for Black Guillemots (*Cepphus grylle*) that are nesting within the Rosslare Europort ORE Hub development area currently, we would request that mitigation is also taken for nesting Black-legged Kittiwakes in the area. It is stated in *Chapter 14- Ornithology* of the EIAR that in June 2025 '*17 Apparently Occupied Nests (AON) were recorded on the outer wall of Rosslare Harbour, outside the Proposed Development boundary*'. While these nests are not within the proposed development boundary, as the Black Guillemot nests are, the use of this wall for

nesting could still be impacted by construction and operation of the Rosslare Europort ORE Hub, either through the diminishing of the habitat quality of the nesting area leading to fewer reproductive outputs or by removing this nesting habitat entirely by displacement, and therefore they deserve mitigation as well.

3. BirdWatch Ireland's Important Bird and Biodiversity Areas (IBAs) and their relationship to the proposed development of the Rosslare Europort ORE Hub

We appreciate the mention of BirdLife and BirdWatch Ireland's Important Bird and Biodiversity Areas (IBAs) within *Chapter 14- Ornithology of the EIAR* and their inclusion in *Figure 14.8 Designated RAMSAR sites and Important Bird Areas*. We are glad that IBAs are being considered to be critical areas of nature designations in Ireland, despite not having legal protection, due to their identification using a globally agreed standardised set of data-driven criteria and thresholds. Within these sites, the species identified as qualifying interests occur in regionally or nationally significant numbers, as well as other important populations of seabirds (despite not meeting the thresholds for IBA designation) [16]. The use of these areas by both qualifying interest and non-designating seabird species shows how important these marine areas are for a variety of seabirds using our waters for activities such as breeding, foraging, and resting.

Of the 145 IBAs in Ireland, we would like to highlight the 75 brand new IBAs for seabirds which we and BirdLife International just recently published [17] (See Figures 1 and 2). During this process, 51 colony and 24 marine IBAs were identified; these sites are available on the BirdLife Data Zone [18]. These new IBAs for seabirds include marine IBAs, which are not mentioned or included within the Rosslare Europort Ore Hub documents, as well as the colony IBAs where critically important seabirds' nest.

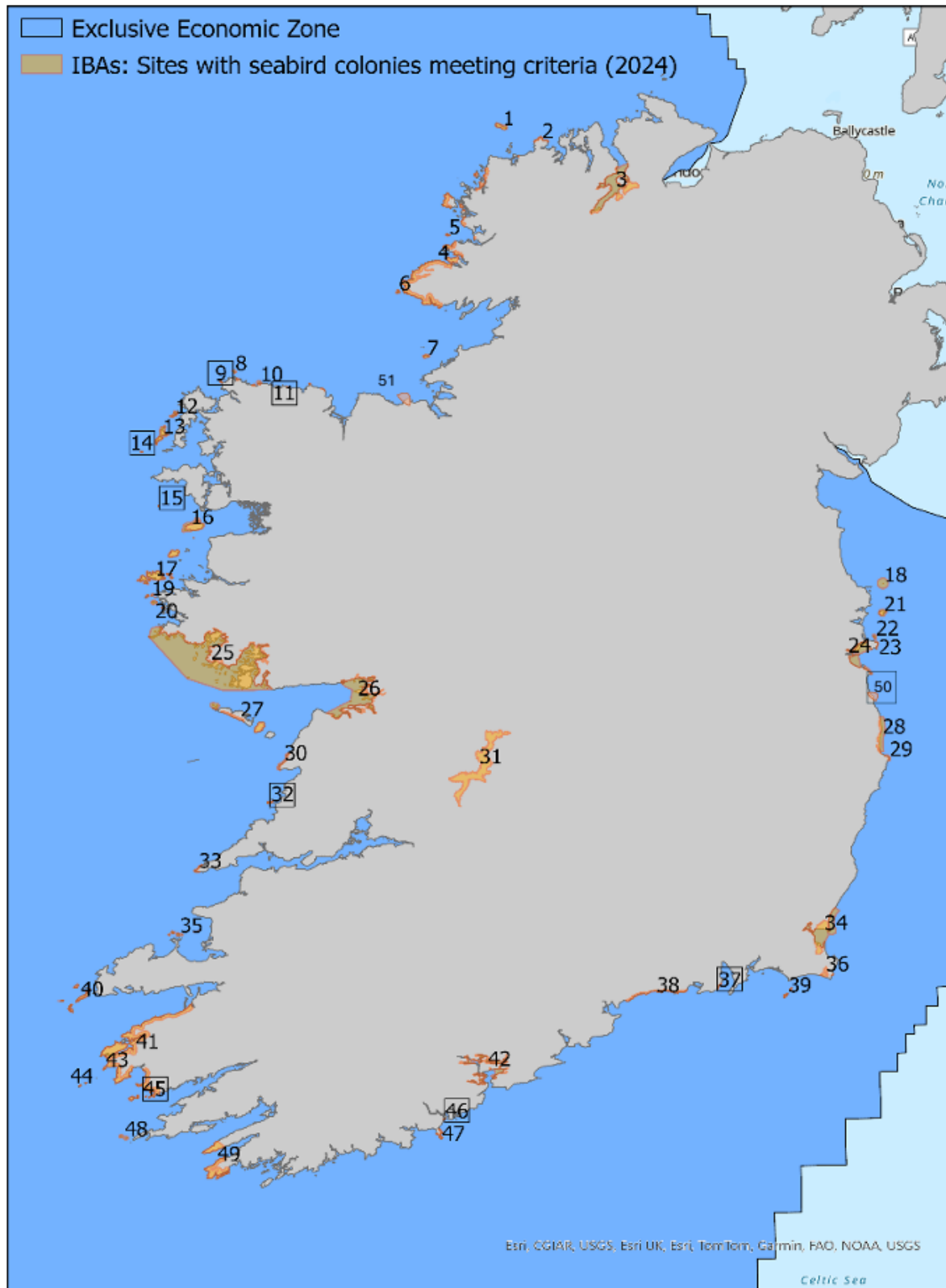


Figure 1: Ireland's colony IBA network of 51 sites.

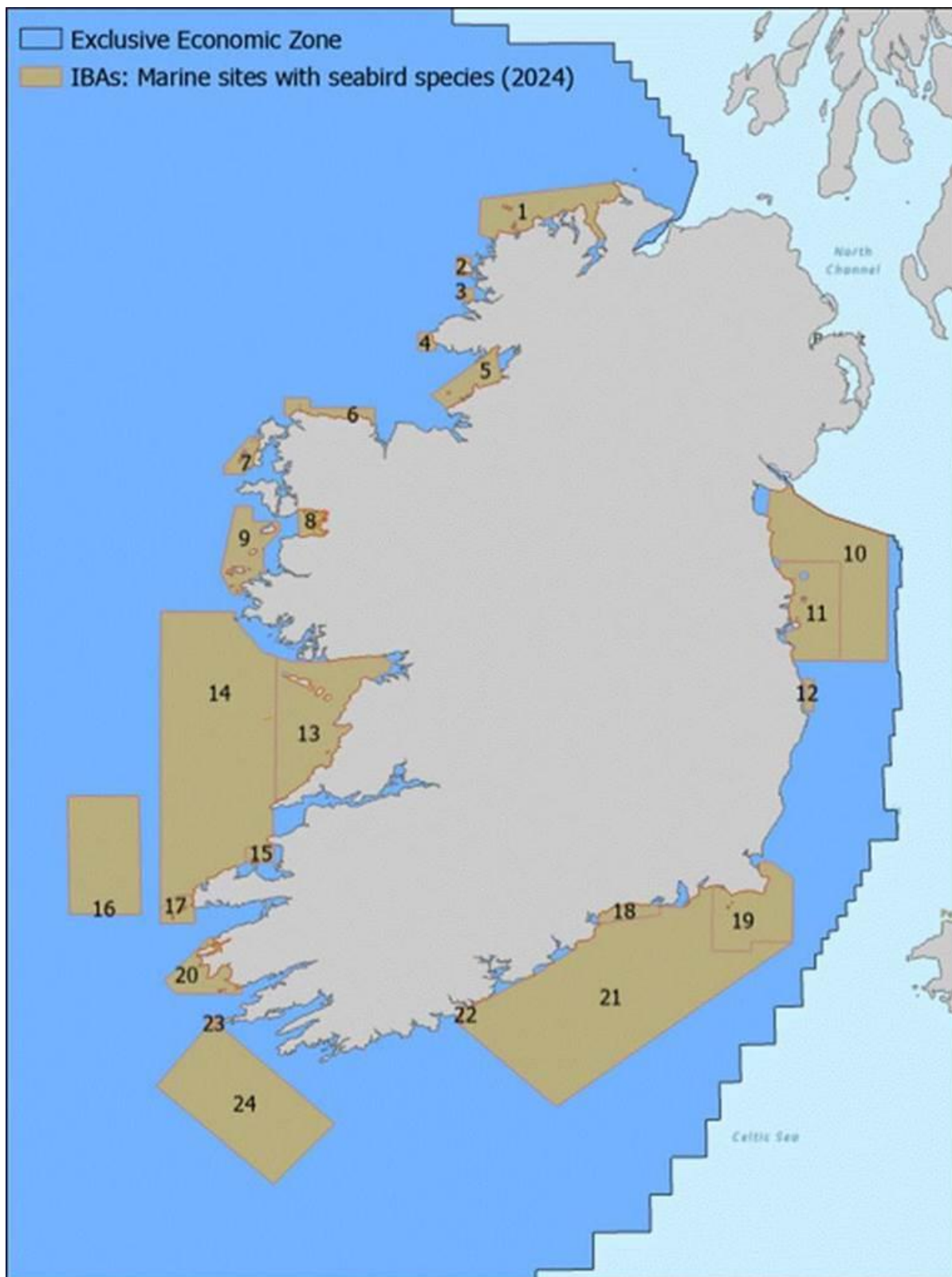


Figure 2: Ireland's marine IBA network of 24 sites.

We appreciate the mention of our IBAs within the documentation for the Rosslare Europort ORE Hub and would request that proper consideration be given to the importance of these sites for seabirds and that impacts to these critical sites are limited by the construction and operation of the port.

Conclusion

Overall, we appreciate that birds are considered well within the EIAR, NIS, AA, and all associated documents for the Rosslare Europort ORE Hub, but there are a few changes that could be made to better address any potential impacts to birds from the development. Conservative and cautionary approaches need to be taken to limit the potential of negative effects to Irish birds caused by Rosslare Europort ORE Hub development, for both important seabirds and habitats, like the QI and designating species of local SPAs and IBAs, and for species that local surveying and research have identified as relying on the habitat within the development's footprint. Cautionary approaches tailored to the local environment and implemented with care and flexibility to address new issues or information are key to ensuring the smallest impact possible on ornithological biodiversity.

Given the evidence presented in the supporting documents, and if our recommendations are taken into consideration, we believe that the development of the Rosslare Europort ORE Hub can be done in a way that limits and reduces significant adverse impacts to bird biodiversity. We at BirdWatch Ireland offer our expertise, experience and advice during this project's construction, development, and operation.

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