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Dear Seran,

Project Erebus Clarification Exercise

Thank you for consulting JNCC on the Blue Gem Wind, Project Erebus Further Clarification Document (Revision 01), dated 8 November 2022, which we received on 22 November 2022.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters.

The documents reviewed are;

- Project Erebus: Further Clarifications, Revision 01, dated 8 November 2022

The advice below relates to:

- **Marine Ornithology**
- **Marine Mammals**
- **Benthic Ecology & Marine Processes**
- **Marine & Coastal Ecology**

Marine Ornithology Comments

General comments

We welcome the use of a worst-case scenario of 70% displacement rate and 10% mortality rate, and thank the applicant for providing this additional analysis.

There remain several aspects of the analysis, particularly with regard to the PVA carried out, which we do not agree with, as outlined in the specific comments below. However, we do agree with the overall conclusion of no AEOSI at Skomer, Skokholm, and Seas off Pembrokeshire SPA for guillemot, razorbill, and puffin. Therefore further analysis is not required.

Specific comments

Table 4.4

There appear to be some discrepancies in the input parameters presented in the various tables of both the Supplementary Environmental Information Addendum and Further Clarifications, and the default values in the PVA tool. As the input parameter log files haven't been presented, it is unknown whether the contents of the tables are typing errors, or copy errors, or the values which were used within the PVA.

For instance:

- Erebus survival rate for guillemot age class 1-2 = 0.762
- PVA tool survival rate for guillemot age class 1-2 = 0.792
- Erebus adult survival rate standard deviation for razorbill = 0.067
- PVA tool adult survival rate standard deviation for razorbill = 0.064
- Erebus survival rate standard deviation for razorbill age class 0-1 and 1-2 = 0.209
- PVA tool survival rate standard deviation for razorbill age class 0-1 and 1-2 = none listed
- Erebus productivity and standard deviation for razorbill = mean of 0.642, SD of 0.271
- PVA tool productivity and standard deviation for razorbill (national Wales) = mean of 0.593, SD of 0.181

We would always recommend providing all detail on the inputs to the PVA, including the input parameter log that is generated after each run. We recommend providing all results of the PVA, including graphs of Counterfactual of Population Growth Rate, Counterfactual of Population Size, and population size under baseline and impacted conditions.

4.2.4.1

As previously stated throughout our advice, we do not agree with the use of the BDMPS-derived stable age structures as it is very difficult to say that this is what it is at the specific offshore site in a specific season, or PVA-derived stable age structures due to the uncertainties associated with population modelling. We currently advise that proportions of adults and immatures are based on age-class information from site-specific surveys. We note the difficulties associated with ageing some species from digital aerial data and currently recommend that in the absence of site-specific information on age classes, a precautionary approach assuming all adult-type birds are adults is adopted.

Table 4.6

We advise that relative mortalities for inputting into the PVA are calculated from the absolute mortality estimates as a proportion of the SPA breeding population (29,744), as opposed to the modelled population in 2028, due to the underlying uncertainties in forecasting populations, such as those highlighted in the “PVA sense-check and choice of model option” section (5.3.4.11 to 5.3.4.17) of the Supplementary Environmental Information Addendum.

Marine Mammal Comments

Our Marine Mammal specialists have noted the comments provided in the Project Erebus Technical and General Consultation Responses spreadsheet and have no further comments to make.

Benthic Ecology & Marine Processes / Marine & Coastal Ecology

JNCC have added comments to the Project Erebus Technical and General Consultation Responses spreadsheet were applicable. JNCC are content for this to be the final response to issues raised, however, we would request that where disagreement still exists and where issues are outstanding that these are brought forward for consideration for any future projects.

Please contact me with any questions regarding the above comments.

Yours sincerely,

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