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To whom it may concern,

Mona Offshore Wind Project Development Consent Order Application – Environmental Statement and Management Plans – EN010137 – Response to the document “S_PD_1 Errata Sheet” (PDA-006)

Thank you for consulting JNCC on the Mona Offshore Wind Project Development Consent Order (DCO) Application including the Environmental Statement (ES) and Management Plans. Notification of acceptance for examination by the Secretary of State for Energy Security and Net Zero was received on 2 April 2024.

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 and defer to comments provided by Natural Resources Wales Advisory (NRW-A) for aspects relating to inshore waters and Natural England (NE) were appropriate.

The advice below relates to the document “S_PD_1 Errata Sheet” (PDA-006).

We thank the Applicant for providing corrections to errors within the Errata sheet [REP1-044](#). We also thank the Applicant for stating the intention to provide updated versions (tracked and clean) at Deadline 2 of the offshore ornithology application document that include errata listed in paragraph 1.1.1.3 of [REP1-044](#).

We await receipt of updated versions of offshore ornithology application document, and will provide comment on the implications of errata once we have reviewed these revised documents. We are keen to ensure, for example, that where errata have been identified in

seasonal impacts, this is followed through into the annual impacts. Similarly, following through corrections in errata through into subsequent stages of assessment.

We are minded to mention that there are other errors beyond those stated in the Errata Sheet ([REP1-044](#)), which may or may not be corrected within updated versions (tracked and clean) of the offshore ornithology application documents. Again, we await receipt of these amended documents before providing comment on outstanding errors as we are aware that more errors may be being corrected than is listed in the Errata Sheet ([REP1-044](#)).

Whilst this will go some way to alleviating our concerns regarding having confidence in the scale of the predicted impacts, we note that there remain some disagreements between the SNCB-advised approach and the Applicant's approach to several elements of the impact assessment. Additionally we note that where multiple errors occur within stages of an assessment, these may compound one another and their implications of the conclusions of the assessment should be considered as a whole rather than each error individually. Without the full impact assessment being provided using the SNCB-advised approach, we remain of the opinion that we cannot agree the results of the EIA and HRA rule out there being significant/adverse effect beyond reasonable scientific doubt.

We have the following comments on specific errata:

[REP1-044](#) Page 2 & Page 3, relevant to HRA Stage 2 ISAA for SPAs and Ramsar sites Section 5 & Stage 1 HRA Screening Report Table A2 to A14

Error: The lowest displacement and mortality rates have been taken forward in the HRA.

Correction: The Applicants considered most scientifically robust value should be used as presented with Volume 6, Annex 5.5: Offshore ornithology displacement technical report (APP092).

JNCC comment: We do not agree that single values of displacement and mortality should be used for analysis of population impacts. See full response in [REP1-066](#) paragraphs 37 to 43.

[REP1-044](#) Page 7, relevant to Volume 2, Chapter 5: Offshore ornithology Paragraph 5.9.3.31

Error: The addition of 156.54 mortalities would increase the baseline mortality rate by 0.123%.

Correction: The addition of 160.09 mortalities would increase the baseline mortality rate by 0.123%.

JNCC comment: The correction in the number of mortalities is valid, but the increase in baseline mortality should also be recalculated, which should result in an increase of 0.125%, as opposed to 0.123%. This should be carried through to the calculation of displacement plus collision cumulative assessment.

[REP1-044](#) Page 7, relevant to Volume 2, Chapter 5: Offshore ornithology Paragraph 5.9.4.5

Error: Using the largest UK Western Waters BDMPs population of 911,586 individuals, with an average baseline mortality rate of 0.157, the background predicted mortality would be 142,207.

Correction: Using the largest UK Western Waters BDMPs population of 911,586 individuals, with an average baseline mortality rate of 0.157, the background predicted mortality would be 143,119.

JNCC comment: According to Table 5.15 of [APP-057](#), the average baseline mortality rate of black-legged kittiwake is 0.156, not 0.157. Therefore the error appears to be in the baseline

mortality rate itself, not the number of background mortalities. Using the baseline mortality rate value of 0.156, the background predicted mortality would be 142,207, as was originally written.

REP1-044 Page 8, relevant to Volume 2, Chapter 5: Offshore ornithology Tables 5.25

Error: Atlantic puffin in the non-breeding season Mean Seasonal Peak abundance is 0 birds.

Correction: Atlantic puffin in the non-breeding season Mean Seasonal Peak abundance is 22 birds.

JNCC comment: The annual total and cumulative seasonal and annual totals should also be updated to reflect this error.

REP1-044 Page 8, relevant to Volume 2, Chapter 5: Offshore ornithology Tables 5.61 and 5.93

Error: Atlantic puffin cumulative abundances for Erebus Floating Wind Demo is 15 individuals during the breeding season.

Correction: Atlantic puffin cumulative abundances for Erebus Floating Wind Demo is 1,416 individuals during the breeding season.

JNCC comment: The annual total and cumulative seasonal and annual totals should also be updated to reflect this error, as well as the displacement matrices.

REP1-044 Page 8, relevant to Volume 2, Chapter 5: Offshore ornithology Tables 5.61 and 5.93

Error: Atlantic puffin cumulative abundances for Erebus Floating Wind Demo is 0 individuals during the non-breeding season.

Correction: Atlantic puffin cumulative abundances for Erebus Floating Wind Demo is 160 individuals during the non-breeding season.

JNCC comment: The annual total and cumulative seasonal and annual totals should also be updated to reflect this error, as well as the displacement matrices.

REP1-044 Page 8, relevant to Volume 2, Chapter 5: Offshore ornithology Tables 5.65 and 5.98

Error: Northern gannet cumulative abundances for Erebus Floating Wind Demo is 0 individuals during the non-breeding season.

Correction: Northern gannet cumulative abundances for Erebus Floating Wind Demo is 100 individuals during the nonbreeding season.

JNCC comment: Northern gannet cumulative abundances for Erebus Floating Wind Demo is 100 individuals during the pre-breeding/spring season, not the non-breeding season. The annual total and cumulative seasonal and annual totals should also be updated to reflect this error, as well as the displacement matrices.

REP1-044 Page 9, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.98

Error: Northern gannet cumulative abundances total (all projects) for annual abundance is 6,690.

Correction: Northern gannet cumulative abundances total (all projects) for annual abundance is 7,119.

JNCC comment: This correction does not appear to account for the error from the pre-breeding season from Erebus (see previous comment). Therefore, the total should be updated to reflect both the original calculation error and the error in the Erebus value.

REP1-044 Page 9, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.102

Error: Operations and maintenance phase cumulative northern gannet mortality is 47 (range 40 to 535).

Correction: Operations and maintenance phase cumulative northern gannet mortality is 50 (range 43 to 570).

JNCC comment: This correction does not appear to account for the error from the pre-breeding season from Erebus (see previous comments). Therefore, the displacement matrices should be updated to reflect both the original abundance calculation error and the error in the Erebus abundance value.

REP1-044 Page 9, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.104

Error: Black-legged kittiwake cumulative abundances total (all projects) for annual abundance is 26,604.

Correction: Black-legged kittiwake cumulative abundances total (all projects) for annual abundance is 25,897.

JNCC comment: This corrected value appears to be without the 707 from Burbo Bank Extension. Was this a mistake originally, is there no annual value for Burbo Bank Extension?

REP1-044 Page 9, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.28 and 5.35

Error: Manx shearwater bio-season and annual displacement estimates spring migration is 6 birds.

Correction: Manx shearwater bio-season and annual displacement estimates spring migration is 3 birds.

JNCC comment: The annual abundance should also be updated to reflect this error. The "Number of Manx shearwater subject to mortality (indiv.)" annual value should also be updated. This appeared to also be incorrect before accounting for this spring abundance error. Also note comment 30 in JNCC's Written Representations ([REP1-066](#)) for details of incorrect calculation of Manx shearwater post-breeding calculation.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.31

Error: Razorbill bio-seasons and annual displacement estimates breeding migration abundance is 92.

Correction: Razorbill bio-seasons and annual displacement estimates breeding migration abundance is 83.

JNCC comment: The annual abundance should also be updated to reflect this error, as well as the displacement matrices.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.31

Error: Razorbill bio-seasons and annual displacement estimates Autumn migration abundance is 86.

Correction: Razorbill bio-seasons and annual displacement estimates Autumn migration abundance is 91.

JNCC comment: The annual abundance should also be updated to reflect this error, as well as the displacement matrices.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets annually is 0.45.

Correction: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets annually is 3.42.

JNCC comment: The cumulative totals should also be updated to reflect this error, if not done so already.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets during the breeding season is 0.53.

Correction: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets during the breeding season is 0.93.

JNCC comment: The cumulative totals should also be updated to reflect this error, if not done so already.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets during the nonbreeding season is 0.98.

Correction: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets during the nonbreeding season is 2.49.

JNCC comment: The cumulative totals should also be updated to reflect this error, if not done so already.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets annually is 0.71.

Correction: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets annually is 11.82.

JNCC comment: The cumulative totals should also be updated to reflect this error, if not done so already.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets during the breeding season is 2.10.

Correction: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets during the breeding season is 2.57.

JNCC comment: The cumulative totals should also be updated to reflect this error, if not done so already.

REP1-044 Page 10, relevant to Volume 2, Chapter 5: Offshore ornithology Table 5.122

Error: Expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets during the non-breeding season is 2.81.

