Outer Dowsing Offshore Wind

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Predator Reduction Ecological Evidence & Roadmap

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Abbreviations

Acronym	Expanded name
CIMP	Compensation Implementation and Monitoring Plan
DCO	Development Consent Order
Defra	Department for the Environment, Food and Rural Affairs
GT R4 Ltd	The Applicant. The special project vehicle created in partnership between Corio Generation (a wholly owned Green Investment Group portfolio company), Gulf Energy Development and TotalEnergies
JNCC	Joint Nature Conservation Committee
OOEG	Offshore Ornithology Engagement Group
OWF	Offshore Windfarm
RSPB	Royal Society for the Protection of Birds
SMP	Seabird Monitoring Programme
SNCB	Statutory Nature Conservation Body
SoS	Secretary of State
SPA	Special Protection Areas

Terminology

Term	Definition
Array area	The area offshore within the PEIR Boundary within which the generating stations (including wind turbine generators (WTG) and inter array cables), offshore accommodation platforms, offshore transformer substations and associated cabling are positioned.

Term	Definition
Baseline	The status of the environment at the time of assessment without the development in place.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP) from the Secretary of State (SoS) for Department for Energy Security and Net Zero (DESNZ).
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of an impact with the sensitivity of a receptor, in accordance with defined significance criteria.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Landfall	The location at the land-sea interface where the offshore export cable will come ashore.
Mitigation	Mitigation measures, or commitments, are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
Outer Dowsing Offshore Wind	The Project
Onshore Infrastructure	The combined name for all onshore infrastructure associated with the Project from landfall to grid connection.
The Project	Outer Dowsing Offshore Wind including proposed onshore and offshore infrastructure.
Wind turbine generator (WTG)	All the components of a wind turbine, including the tower, nacelle, and rotor.

1 Summary

1.1 Background

1.1.1 This report provides a review of the evidence of the potential for predator control measures to increase the annual recruitment of common guillemot, *Uria aalge* (hereafter 'guillemot'), and razorbill, *Alca torda,* in addition to a variety of other species into the regional population of the southern North Sea. The report also provides initial site selection options and roadmap for the delivery of this compensation measure on a without prejudice basis for impacts to the Flamborough and Filey Coast (FFC) Special Protection Area (SPA), in relation to the potential impacts of Outer Dowsing Offshore Wind (the Project).

1.1.2 The draft Report to Inform Appropriate Assessment (RIAA; Document 7.1) has concluded that there would be no Adverse Effect on Integrity (AEoI) to the FFC SPA for guillemot and razorbill. Without prejudice compensation has been developed for these species in response to stakeholder concerns.

1.2 Key Findings

1.2.1 Evidence is presented that predator control has the potential to be highly beneficial to guillemot and razorbill populations, especially island colonies, based on previous eradication programmes (e.g. on Lundy Island).

1.2.2 Both brown rat, *Rattus norvegicus,* and black rat, *Rattus rattus,* were identified as one of the key predators whose control could benefit guillemot and razorbill populations. Controlling ground predators is also considered more feasible than reducing avian predation.

1.2.3 A desk-based review of possible sites revealed islands where predator reduction could be undertaken, including sites across the Channel islands, Isles of Scilly, English and Scottish Islands.

2 Introduction

2.1 Project Background

2.1.1 GT R4 Limited (trading as Outer Dowsing Offshore Wind) hereafter referred to as the 'Applicant', is proposing to develop the Project. The Project will be located approximately 54km from the Lincolnshire coastline in the southern North Sea. The Project will include both offshore and onshore infrastructure including an offshore generating station (windfarm), export cables to landfall, and connection to the electricity transmission network (see Part 6, Volume 1, Chapter 3: Project Description for full details).

2.2 Document Purpose

2.2.1 The draft Report to Inform Appropriate Assessment (RIAA) undertaken for the Project has not identified any adverse effects on guillemot and razorbill, however this report aims to support the identification of potential 'without prejudice' compensation measures for these species in the event the Secretary of State (SoS) disagrees with the assessment results. This report should be read alongside the Project Ornithology Without Prejudice Compensation Strategy (Part 7, Document 7.3).

2.2.2 Controlling the presence of invasive species at seabird colonies can lead to a recovery of populations by increasing the survival and productivity of individuals. Consequently, predator control is being proposed by the Applicant as a 'without prejudice' compensation option and is the focus of this report.

2.2.3 Seabirds are one of the most threatened groups of birds (Dias *et al*., 2019; BirdLife International, 2018), encountering a range of factors driving variation in survival and breeding success, such as prey availability, seabird bycatch, and predation. A recent review highlighted invasive alien species as the greatest threat to seabirds across the world (Dias *et al*., 2019). Predation by invasive species on eggs, chicks and adults can drive reduction in survival of seabird populations, and drive consequent population declines. Guillemot and razorbill are two seabird species that are vulnerable to this pressure in the UK (Thomas *et al*., 2017).

2.2.4 This report firstly provides an overview of the ecological evidence that guillemot and razorbill can benefit from predator control, followed by a roadmap for the delivery, including information on potential implementation, monitoring and biosecurity that may be required to ensure the measure is successful. Potential sites and their suitability for predator control measures are identified throughout. The control of predators is comprised of three main forms of measure (predator eradication, reduction and exclusion). At this stage, all three measures (or a combination of) are considered potential options, with definitions as follows:

- Eradication – The complete removal of a species from a location into which there is little chance of re-invasion by natural dispersal (Town and Broome, 2003);
- Reduction – The use of species removal methods (e.g. trapping, baiting) leading to a reduction in the population size of the target predator species by sustained and constant effort (Parkes, 1990); and

- Exclusion – The use of a structure, such as a fence or nesting protection, to reduce the rate at which a predator encounters the prey species, either individuals or colonies (Smith *et al*., 2011).

2.2.5 Of the above measures, complete eradication is generally considered the most effective, though this may be limited by the feasibility of sites (i.e. eradication is generally only possible on isolated islands). Therefore, at this stage all three potential measures will be considered, encompassed by the general term 'predator control'. Notably, specific measures (e.g. eradication) will be used where relevant.

3 Methodology

3.1 Literature Review

3.1.1 A literature review was undertaken to determine key predators impacting guillemot and razorbill populations, and the extent of the predation issue in the UK. This review also aimed to identify key sites where guillemot and razorbill populations would benefit from predator control measures. Literature searches included, but were not limited to, scientific journals, government reports, relevant websites (e.g. RSPB), and grey literature. A large body of evidence has already been compiled by previous projects (Orsted, 2021; Orsted, 2022) and therefore where possible these reports have been referenced rather than providing duplicated material.

3.2 Data Search

3.2.1 Data on the current and historic locations of guillemot and razorbill colonies, and their population sizes were extracted from the JNCCs Seabird Monitoring Program (SMP) database (JNCC, 2022).

4 Evidence for the Effectiveness of Predator Control Measures

4.1 Guillemot & Razorbill Predation

Background

4.1.1 Guillemot are widely distributed along the coasts of the UK and Ireland, and are predominantly recorded breeding on low-lying flat-topped islands and stacks or on broad and narrow cliff ledges. They have also been recorded breeding under boulders and in caves (Tuck, 1960; Parslow, 1966). Razorbill show a similar UK distribution as guillemots, predominantly nesting on small ledges, in cracks of rocky cliffs, and in scree or on boulder fields (JNCC, 2021a; 2021b).

Susceptibility to Predation

4.1.2 Predation by non-native (invasive) predators has been identified as the greatest threat to seabirds across the world (Dias *et al*., 2019), with invasive predators impacting seabird colonies by predating on eggs, chicks and adults. The presence of invasive species can be particularly damaging for isolated island colonies which have not co-evolved with the presence of these species, and therefore lack the behaviours and mechanisms to avoid and/or reduce their impacts.

4.1.3 A number of sites and predators have been identified as impacting guillemot and razorbill populations.

4.1.4 Rats were one of the key predators identified, with two UK species being the most prevalent in their impacts on seabird populations: brown rat and black rat. The impacts of both rat species are predominantly linked to predation on eggs and chicks, as evidenced through rat tissue analysis on the Shiant Islands (Stapp, 2002), though predation on small adults has also been evidenced (Atkinson, 1985). Evidence for rats driving declines of guillemot and razorbill is evident across a number of sites, with declines in guillemot and razorbill numbers at Canna associated with observed predation of eggs by rats[1] (Swann, 2002; 2013).

4.1.5 Other invasive mammalian predators known to be a potential threat to breeding auks include American mink *Mustela vision*, feral ferrets *Mustela furo*, house mice *Mus musculus,* feral cats *Felis catus* and European hedgehogs *Erinaceus europaeus*.

4.2 Predator eradication

4.2.1 A number of predator eradication projects have been undertaken across sites in the UK. Typically, these projects have focussed on species such as Manx shearwater *Puffinus puffinus* and Atlantic puffins *Fratercula arctica*, and so direct evidence of benefits to guillemot and razorbill are comparatively underreported. However, evidence of benefits to guillemot and razorbill is available from several sites.

[1] Notably rat eradication has now been undertaken at this site

Canna and Sanday

4.2.2 Canna and Sanday are two islands located in northwest Scotland, and comprise a Special Protection Area (SPA). Predation by rats at this site was driving declines in seabird populations, including guillemot and razorbill (LIFE, 2008; Luxmoore *et at*., 2019; Swann, 2002)

4.2.3 In 2005-2006 a rat eradication programme was carried out, with no signs of rats present on the two islands by February 2006 (Luxmoore *et al*., 2019). Following a post-eradication monitoring programme, the island was officially declared rat free in 2008 (Bell *et al.,* 2011).

4.2.4 Notably, guillemot numbers were at their highest before the eradication programme, with 1,249 nests counted in 2001, which was followed by a large decline to 291 in 2010. However, this was followed by an increase in numbers over the following 9 years to 602 nests in 2019, likely contributed to by the eradication of rats (Swann *et al*., 2019). Following eradication, guillemot were also recorded recolonising areas which had previously been clear of nests for several years (Swann, 2008).

4.2.5 Razorbill also showed positive results in response to the rat eradication programme. Prior to eradication, razorbill were undergoing a long-term decline since the 1990s, however, a sharp increase in breeding numbers was evident in 2006, and numbers reached their peak count in 2019 (425 nests)(Swann *et al*., 2019). Following the eradication, razorbill also recolonised areas of the islands that has previously been clear of nesting (Swann, 2008; Swann *et al*., 2016).

Lundy

4.2.6 Lundy Island is located in the Bristol Channel, UK, 19km off the Devon coast. Owing to the presence of both brown and black rats on the site, and the importance of the site for seabird species, including guillemot and razorbill, the Seabird Recovery Project was set up in 2001 aiming to eradicate both species of rat. This process was predominantly undertaken for the benefit of burrow nesting seabirds (e.g. puffin and Manx shearwater), though other species such as guillemot and razorbill were expected to also benefit. A ground-based eradication was undertaken between 2002 and 2004, with Lundy being officially rat-free in 2006.

4.2.7 Following the eradication, guillemot numbers have shown a large and consistent increase in population size, rising from 2,348 individuals prior to eradication in 2000, to 9,880 individuals in 2021 (JNCC, 2022). Additionally, numbers have shown a consistent increase during every year of monitoring following the eradication (Figure 4.1).

4.2.8 Similar population increases are evident in Razorbill, rising from 950 individuals in 2000 to 3,533 in 2021, again with consistent increases during every year following eradication (JNCC, 2022) (Figure 4.1).

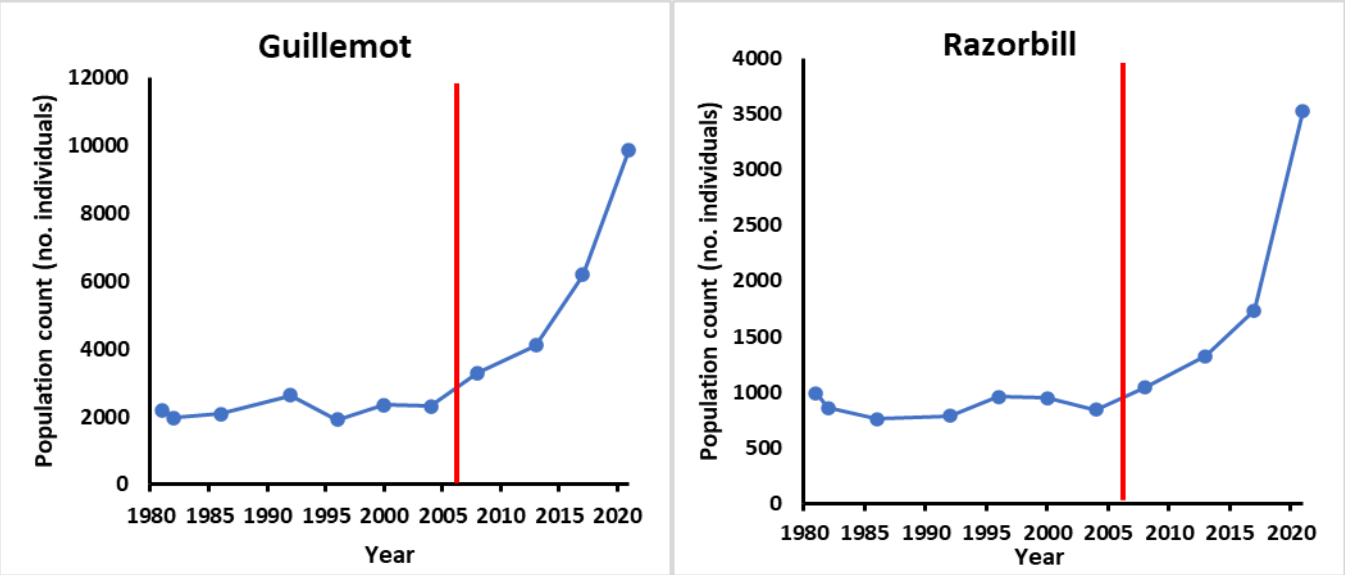

Figure 4.1: Population counts of guillemot and razorbill at Lundy Island before and after the site was declared rat free in 2006 (red line)

4.2.9 In comparison to neighbouring guillemot and razorbill colonies, population trends at Lundy following rat eradication are significantly better than the neighbouring colonies of Skomer (which is free from rats) and Castlemartin Coast (which is not free from rats), as shown in Table 4.1 and Table 4.2, evidencing significant benefits of the eradication programme for these species.

Table 4.1: Percentage population increase of guillemot numbers at Lundy following predator eradication in comparison to nearby colonies. Data source: BTO/JNCC SMP (JNCC, 2022)

	Lundy	Skomer	Castlemartin Coast
Change 2000-2017	164%	79%	94%
Change 2004-2017	167%	75%	32%
Change 2008-2017	88%	45%	13%

Table 4.2: Percentage population increase of razorbill numbers at Lundy following predator eradication in comparison to nearby colonies. Data source: BTO/JNCC SMP (JNCC, 2022)

	Lundy	Skomer	Castlemartin Coast
Change 2000-2017	83%	93%	32%
Change 2004-2017	106%	66%	39%
Change 2008-2017	66%	51%	52%

Shiant Isles

4.2.10 The Shiants are comprised of a group of small, uninhabited islands on the west of Scotland. The site forms an SPA, supporting significant numbers of breeding seabirds, including 7% of the UK razorbill population (Mitchel *et al*., 2004). An estimated population of at least 3,600 black rats was shown in 2012, alongside records of the rats predating on seabird eggs and chicks, including razorbills (LIFE, 2018).

4.2.11 In 2008, the Shiant Isles Recovery Project was established, which classified both guillemot and razorbill populations as declining and unfavourable (LIFE, 2018). The recovery project initiated a rat eradication project in 2015/16 and the site was declared rat-free in 2018 (Main *et al*., 2019).

4.2.12 Owing to a short time-frame since eradication, and a lack of colony counts, a complete assessment of the benefits of the eradication to guillemot and razorbill was not possible to determine. However, there is evidence of razorbill breeding success being higher than pre-eradication, rising from 0.72 in 2015 to 0.79 in 2019 (LIFE, 2018).

4.3 Predator exclusion

4.3.1 Traditionally, predator control has focused on offshore islands where there is a natural barrier (i.e. a body of water) to the reintroduction of the predator. However, there is increasing evidence that predator exclusion fences can be an effective tool to control the presence of predators at sites where predators are not naturally excluded (Burns *et al.,* 2012; Ringma *et al.,* 2020).

4.3.2 Some of the best examples of successful predator control fencing come from New Zealand where they have been a valuable tool to achieve important conservation outcomes for multiple threatened species. Pest proof fences now protect one of last North Island colonies of grey-faced petrel, *Pterodroma macroptera,* and one of the few remaining sooty shearwater, *Puffinus griseus,* colonies on South Island (Burns *et al.,* 2012).

4.3.3 Exclusion fences are most effective when used in-combination with eradication measures immediately following fence construction to remove any remaining predators from within the enclosure (Miller *et al.,* 2010). Additionally, the periodic removal of predators (e.g. yearly) can ensure that the benefits of the exclusion fence are maintained. This is particularly important in areas where predators can walk or swim around the fence ends. Likewise, maintenance of the fence is essential to avoid predators exploiting any breaches.

4.3.4 A key consideration is that every site is unique and may require a different solution depending on the target species, predators and habitat type. The RSPB provide detailed guidance on the use of predator exclusion fences to reduce mammalian predation on ground-nesting birds, with several examples provided throughout their report (White and Hirons, 2019).

4.4 Conclusion

4.4.1 Based on the above evidence across UK sites, it is highly likely that a predator reduction programme would result in significant benefits to guillemot and razorbill colonies. Predator reduction (particularly eradication) has the potential to lead to population increases, alongside (re-) colonisation of guillemot and razorbill to whole or parts of islands.

4.4.2 As the number of offshore islands that are suitable for predator eradication is very limited in England, predator exclusion fences provide a viable alternative solution to achieve similar conservation objectives for seabirds. Predator exclusion fencing can be an effective way to protect ground nesting birds at existing colonies, aiming to increase chick survival and increase productivity while reducing the need for lethal predator control (White & Hirons, 2019). The most common types of fencing are barrier and electric fencing, both of which have been shown to be effective in protecting bird species from predators.

5 Roadmap for delivery

5.1 Implementation

Site Selection

5.1.1 An initial desk-based site selection process has been undertaken, focusing on locations which support populations of guillemot and/or razorbill colonies, invasive predators (predominantly focusing on rats), and where predator control measures would be feasible. Islands as opposed to mainland sites were the focus of the feasibility study owing to the greater potential success of full eradication or control/exclusion, and the lower risk of reinvasion of predators. The feasibility criteria and site selection process were informed by Stanbury *et al*. (2017), taking into account factors such as the swimming distance to other surrounding sites, human population size and island area size. A number of locations were identified from initial review, including:

- Channel Islands - Several sites
- Isles of Scilly - Several islands and islets
- Scottish Islands - Several sites

5.1.2 The next steps involve undertaking a feasibility study of potential sites. Within this, the number of potential sites will be narrowed down, based in part on consultation with relevant site managers and predator control experts. Information required from the feasibility study includes, but is not limited to:

- The feasibility of undertaking predator control on the relevant site, including whether a full eradication, or a control/exclusion is possible;
- The extent of the predation issue, and the predator species present;
- Any site-specific requirements (including over the lifetime of the measure);
- The expected quantifiable benefits to guillemot and razorbill as a result of eradication on the site; and
- The connectivity of birds at the proposed site with relevant SPAs (e.g. FFC SPA) and the UK national site network.

5.1.3 It is noted that very few remaining sites in England have evidence of predation suppressing seabird populations, with several having already undergone successful predator control programmes. The main options at this time are the Isles of Scilly and the Channel Islands. In addition, other developers (such as Orsted's Hornsea Project Four) are looking into the feasibility of carrying out predator eradication at many of the remaining sites, leaving few options available for the Applicant.

5.1.4 Both guillemot and razorbill show a significant degree of breeding philopatry (>90%), meaning that they return to the same colonies at which they successfully breed year on year. However, they do show a lower degree of colony philopatry (guillemot = ~50%; razorbill = ~80%). This means that roughly 50% of guillemots disperse away from the colony that the chick hatched from and recruit to non-natal colonies (Swann and Ramsay, 1983; Lyngs, 1993; Harris *et al*., 1996; Lavers *et al*., 2007). This is evidenced by some colonies showing very high rates of reproductive growth, indicating that immigration into the colony is occurring (Hudson, 1982). Hornsea Project Four provided considerable evidence of connectivity of guillemot and razorbill breeding in the Channel Islands with North Sea populations and beyond from ringing studies (Orsted, 2022b).

5.1.5 In Scotland, there may be opportunities to carry out predator eradication, particularly on isolated islands. However, it is unclear if English projects will be permitted to carry out compensation in Scotland considering the number of Scottish projects that may require future compensation. Primary focus is therefore directed at English sites with Scottish options only being pursued at a strategic or collaborative level.

5.2 Strategic approach

5.2.1 The Applicant would consider the potential to deliver predator eradication through a partnership agreement with one or more OWF developers, or the potential for delivery of compensation through the Offshore Wind Industry Council programmes and via the Marine Recovery Fund in delivering predator reduction as a strategic option.

5.3 Consultation

5.3.1 Engagement with stakeholders will be required through all stages of the development of predator control measures.

5.3.2 Following project consent, an Offshore Ornithology Engagement Group (OOEG) will be convened by the Applicant to assist on the implementation, reporting and any other relevant matters as determined by the SoS when approving the OOEG terms of reference. The OOEG will also aim to engage with relevant stakeholders throughout the whole process.

5.3.3 Extensive consultation with stakeholders via the OOEG will be undertaken to ensure cooperation across all monitoring aspects of the predator control programme. Results of monitoring processes will also be discussed with the OOEG. Further information on monitoring aspects resulting from this will be provided in the guillemot and razorbill Compensation Implementation and Monitoring Plan (CIMP).

5.4 Monitoring

5.4.1 Monitoring will be undertaken at all stages of the eradication programme to assess the feasibility of predator control, expected impacts on seabirds targeted for compensation, and to determine any unexpected impacts of the control measures. The detail of monitoring proposals will be discussed with the OOEG and detailed in the implementation plan for agreement with the Secretary of State.

Pre-Implementation Monitoring

5.4.2 As part of the feasibility study outlined in Section 5.1, monitoring will be undertaken at identified sites to establish the presence and distribution of predators on the site, alongside collecting evidence of predation on seabirds where possible.

5.4.3 During pre-implementation monitoring, other relevant data may also be collected, such as up-to-date seabird population counts and productivity data which can be used as a baseline to assess against changes following predator control in future assessments. Habitat surveys may also be undertaken to determine the amount of suitable nesting habitat available for guillemot and razorbill, and consequently quantify the potential benefits of the predator control programme.

Post-Implementation Monitoring

5.4.4 Monitoring of both targeted predators and relevant seabirds will be undertaken following implementation of the predator control programme.

5.4.5 Monitoring of targeted predators will be undertaken to ensure the success of the predator reduction measure. Notably for eradication, this will involve monitoring of signs of predators to identify early signs of re-invasion, whereas for predators which are excluded or predator reduction programmes, monitoring will aim to identify any increases in predator numbers above target levels. This will be undertaken both during the predator reduction programme, and throughout the lifetime of the measure.

5.4.6 Monitoring of dead rodent carcasses is necessary during the baiting process, alongside systematic monitoring for surviving individuals in the weeks following. Methods may include the use of non-toxic flavoured paraffin wax blocks, tracking tunnels, and motion activated cameras.

5.4.7 To assess the response of guillemot and razorbill, and other seabird species, to the predator removal programme, monitoring will be undertaken in the form of a breeding seabird census project. Population trends will be compared to pre-eradication levels to assess any changes as a result of the programme. Any population increases will also be evaluated in a local, regional, and national context, comparing any population recovery to other guillemot and razorbill colonies to assess the success of the project. This process may involve undertaking seabird censuses at other local or regional guillemot and razorbill colonies.

5.4.8 Monitoring will continue for the operational phase of the Project, with the frequency of monitoring to be detailed in the implementation plan.

5.5 Lessons Learned from Previous Predator Control Programmes

5.5.1 A predator control programme may fail for several main reasons:

- Operational failure, whereby the target species was not fully eradicated;
- Subsequent reinvasion of the target species; and
- Failure to attract new breeders to the target colony.

5.5.2 Operational failure due to incomplete removal of the target species may be due to the inadequate availability of bait (either through lack of availability, or poor bait distribution), or biological factors such as rodents only foraging in un-baited areas (Holmes *et al*., 2015). This has been evidenced in the Western Isles eradication of mink, where a lack of traps led to mink not being fully removed, resulting in breeding populations becoming re-established on the southern island group (North Uist and Benbecula) (Harrington *et al*., 1999). Avoidance of this can therefore be achieved through adequate baiting of the proposed site, coupled with biosecurity measures to ensure any uneradicated predators are identified as soon as possible, as outlined in section 5.6.

5.5.3 Natural reinvasion may be either natural (e.g. species swimming between areas), or anthropogenic (e.g. humans transporting predators on vessels). In areas where reinvasion may occur due to close proximity, such as if two sites are within the swimming distance of rats), then predator reduction, as opposed to complete eradication, should be the focus. Natural re-invasion can be prevented through effective biosecurity measures, involving effective monitoring to prevent reinvasion.

5.5.4 Eradications were undertaken on Puffin Island, Inchgarvie, Ailsa Craig, and Handa Island between 1968 and 1998. On all islands, bait placement was focused on specific habitats and locations as opposed to using systematic grid patterns (Stoneman & Zonfrillo, 2005). This made it difficult to monitor bait consumption, and across all sites monitoring was either minimal or non-existent. The result of this was a reinvasion of rats at Handa Island in 2012 (Thomas *et al*., 2017), and sightings of rats at Inchgarvie since it was declared rat free. Avoidance of re-invasion as outlined above can be achieved through both effective site selection and effective biosecurity measures. For sites earmarked for eradication, factors such as swimming distances of target predators and the proximity of the site to other sites containing predators should be considered. Following site selection and eradication, biosecurity measures can be utilised to avoid reinvasion, as outlined in section 5.6.

5.6 Biosecurity Measures and Adaptive Management

Biosecurity Measures

5.6.1 Following the initiation of the predator eradication programme, biosecurity measures will be implemented to avoid re-invasion of the eradicated predator, and/or invasion of new invasive predator species. Commonly used methods involve vessel control and bait traps at departure and arrival points to minimise the likelihood of predator invasion, alongside continuous surveillance at the site to identify early signs of reinvasion (e.g. through sniffer dogs or chew sticks).

5.6.2 Implemented measures will be consistent with the RSPB Biosecurity for LIFE project, developed to safeguard the UK's internationally important seabird islands. Biosecurity measures will aim to replicate the RSPB Biosecurity for LIFE project, with input from the OOEG. In the unlikely event of reinvasion of the targeted invasive species, a further eradication will be undertaken, followed by continued monitoring and biosecurity measures.

5.6.3 A detailed monitoring and adaptive management plan will be provided in the CIMP. This will be produced in consultation with OOEG members and other relevant parties.

5.6.4 If the eradication programme appears less successful than planned based on monitoring, an assessment will be undertaken to establish the reasons for the lack of success, and to identify methods of improving the eradication programme. If the long-term biosecurity risk at the initial site proves too high, then another location may be chosen, or alternatively a contribution to the Marine Recovery Fund (or equivalent) may be considered, in consultation with the OOEG and Department for the Environment, Food and Rural Affairs (Defra).

5.7 Legal Agreement

5.7.1 During the process of securing any locations shortlisted for predator eradication, the Applicant will endeavour to enter into voluntary agreements with landowners and occupiers to gain access to their land for both implementation of the predator eradication programme, alongside ongoing monitoring throughout the lifetime of the Project. The number of agreements required will vary across different sites depending on the population and land ownership status.

5.7.2 Further details on proposed locations and associated agreements will be presented as part of the DCO Application.

5.8 Key consents

5.8.1 Alongside securing relevant land rights, the Applicant will assess the need for any site-specific consents.

5.8.2 Further details on proposed locations and associated agreements will be presented as part of the DCO Application.

5.9 Funding

5.9.1 A funding statement will be submitted as part of the DCO Application, which will include consideration of the costs associated with any predator reduction programme.

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