Observation and comments on issues with birds in the ACE Paper 8/2023

Section	Observation/Comment
Birds	
-	The EIA Study Brief specifically requested the study team to "investigate and describe" the "roosting, breeding and/or feeding sites" of birds. This is still largely unaddressed.
Table 2C,	The analysis of the results of the bird surveys is based on a direct comparison between 'Early Morning' (a period that averaged 4h 25m) and 'Daytime' (a 12-hour period that
Appendix 2.2	covered both day and nighttime) without any adjustment for time/effort. The key conclusions of the bird survey ('e.g. 'bird density in the daytime session in all Sub-areas was
	higher than or the same as the early morning session") are deeply flawed. It is to be expected that more birds would be recorded in 2.7 times the time in such habitats.
	If survey effort is taken into account, it would be apparent that the survey period undertaken during the EIA is not representative, nor valid for assessment.
	The values in Appendix 2.2 are not explained, rendering an assessment of the results difficult. However, it is apparent that Eastern Cattle Egret (the only bird species mentioned in the EIA Study Brief) is far more abundant in the Early Morning (34 recorded) compared to 10am – 10pm (20 recorded); per hour of survey, this would translate to 7.7 individuals, vs. 1.7.
2.5.1	The EIAO Guidance Note No. 10 states that "In general, early mornings are usually the best time of the day for bird survey unless some nocturnal species or behaviours are to
	be studied.". The reason for not doing early morning surveys in the first place, when it has been deemed as the best approach, remains unclear.