

Bilag H. Skema til kommentering af udkast hos rekvirent/ekstern part

Product title	Energy Island North Sea, WP H – Bats, Technical Report		
Product responsible	Ole Roland Therkildsen (EINS project manager, AU) Morten Elmeros (WP H – Bats project manager, AU) Signe Brinkløv (main author, Technical Report, WP H Bats)		
External institution	Energinet Eltransmission A/S		
Contact person	Morten Bak		
Deadline for comments	Comments returned from ENDK in Word edition of the report on ENDK/NIRAS/AU Sharepoint site. Comments transferred to current document (Bilag H) by Signe Brinkløv (AU) 30-04-2024	Date for handling comments 21-05-2024	

	Rekvirent			Institut	
	Evt. linjenr.	Kommentar	Ansvarlig for kommentar	Begrundet håndtering af kommentar	Ansvarlig for håndtering
1	Page 3 header	No QA from NIRAS?	ENDK	Following quality assurance by DCE, the report underwent quality assurance by Rasmus Bisschop-Larsen from NIRAS. Unknown why this does not appear from the header, which, agreed, it should. NIRAS QA is now added with full name and affiliation under 'Approved by'	Signe Brinkløv, AU
2	Fig 0.1, page 4 (photo of bat PAM station/buoy)	Why do you have this figure at the beginning of the report? And have you mentioned the figure in the text?	ENDK	Figure placement was due to suggested use as report front page when the report was sent to NIRAS but apparently a new front page was added to the document instead. The figure now occurs as figure 3.2 in the Methods section.	Signe Brinkløv, AU

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3	Fig 0.1, page 4, legend	What is a St. John's cross?	ENDK	Rewritten to explain: yellow St. Andrews cross top mark	Signe Brinkløv, AU
4	List of key terms, page 5, top	Why do you have the autocorrect language to English (Ireland). Isn't the standard to be 'English (USA) or English (Storbritannien)?	ENDK	Not relevant to readability of the report	Signe Brinkløv, AU
5	List of key terms, page 5	Are we using the term, Energiø Nordsøen, Energy Island North Sea or Nort Sea Energy Island?	ENDK	We now follow the terms as clarified by ENDK, these are used in the list of key terms and throughout the report.	Signe Brinkløv, AU
6	List of key terms, page 5, table row 1	Pre investigation area?	ENDK	'Survey area' changed to pre-investigation area	Signe Brinkløv, AU
7	List of key terms, page 5, table row 2	No. No reference to the plan area is accepted. It is outside the scope of this report.	ENDK	Plan area omitted	Signe Brinkløv, AU
8	List of key terms, page 5, table row 3	Is this still going to be included even if there no longer is an artificial energy island?	ENDK	Row deleted, see also reply #5 above	Signe Brinkløv, AU
9	List of key terms, page 5, table row 3	Using the plan area is not acceptable. This is not the SEA but a stand alone background technical report.	ENDK	Row deleted, see also reply #5 above	Signe Brinkløv, AU
10	List of key terms, page 5, table row 4	This report is aa technical background report, and has no direct reference to the SEA. Therefore plan area are to excluded and reference should solely be done in order to the pre investigation area. Furthermore	ENDK	Row deleted, see also reply #5 above	Signe Brinkløv, AU

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		The island and its location is no longer an option and should also be excluded.			
11	List of key terms, page 5, table row 4	These terms are literally not used in the report, so why list them as key terms. Furthermore they are no longer relevant.	ENDK	Row deleted, see also reply #5 above	Signe Brinkløv, AU
12	Summary, 1. Introduction and aim, page 6	Please exclude as it is no longer relevant.	ENDK	The introductory paragraph for use across work packages was supplied by Energinet and has been inserted. This now appears from the Preface page.	Signe Brinkløv, AU
13	Summary, 1. Introduction and aim, page 6	-	-	No comment from client but text adjusted according to the clarified terms.	Signe Brinkløv, AU
14	Summary, 1. Introduction and aim, page 6	Not relevant. Please omit. (in reference to sentence: The study was carried out on behalf of Energinet Eltransmission A/S by DCE in collaboration with NIRAS during Fall 2022 and Spring 2023)	ENDK	Sentence deleted. Project time frame still appears from text under 1.1. Aim.	Signe Brinkløv, AU Rasmus Bisschop-Larsen
15	Summary, 1.1 Aim, page 6	No longer relevant. Sufficient to mention the Pre investigation area. (in reference to the sentence part: ...including the proposed area for the artificial island and the area for offshore wind farms)	ENDK	Deleted from text	Signe Brinkløv, AU

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16	Summary, 1.1 Aim, page 6	If these data sources are included throughout the report. Then please omit them from this paragraph.	Morten Bak	Deleted from text. All literature listed here appears throughout the report and in the reference section.	Signe Brinkløv, AU
17	2. Existing data and knowledge, paragraph 1, page 6	A presentation of relevant species in categories Likely to occur in small or large numbers, Less likely to occur in small and large numbers, Unlikely to occur in small and large numbers. Such a presentation should also be followed up by a description of the biology of the species.	ENDK	We have specified which species have been recorded in relevant areas of the North Sea, which are most likely to occur and added a description of the biology of <i>Pipistrellus nathusii</i> . which is the most likely species to occur in the area.	Signe Brinkløv, AU
18	2. Existing data and knowledge, paragraph 1, page 6	There is something off with this part of the sentence. (in reference to sentence: While this is pending further, systematic studies, such registrations indicate that any infrastructure, e.g., an artificial island and associated wind turbines, may attract, and consequently impact migrating bats at a species and, potentially, population level.)	ENDK	Sentence adjusted, but please elaborate in future to make comment more constructive!	Signe Brinkløv, AU
19	2. Existing data and knowledge,	Please replace with structures. And leave out artificial island and	ENDK	Section now refers to 'offshore construction projects'	Signe Brinkløv, AU

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	paragraph 1, page 6	associated wind turbines. This report, should not adresse elements of a concrete project.			
20	2. Existing data and knowledge, paragraph 2, page 7	Please couple the protection under the habitat directive with the need to investigate the probability of presence of bats in the pre investigation area. Do not adresse this to concrete projects.	ENDK	Done. 'Wind turbines' is not a concrete project but a potential threat to bats at sea. The paragraph is completely general but does indeed describe a well-established conflict between bats and wind turbines which is relevant to all investigations at sea until a much more solid baseline and finer-scale geographical insight into offshore movement patterns of bats is established. Text changed slightly to emphasize that this is a general concern rather than one directed at the pre-investigation and extended survey areas per se.	Signe Brinkløv, AU
21	2. Existing data and knowledge, paragraph 2, page 7	Why is this relevant for a technical background report that solely should address the presence and usage of the pre investigation area. This is not a concrete project and hence should no	ENDK	This comment seems unfinished. It is difficult to see how background information about conflict between bats and offshore wind energy should not be relevant to a pre-investigation of bats' presence and usage of an area offshore, whether this area is (hypothetically) prospected for offshore wind energy or not. Please also see reply to comment #20.	Signe Brinkløv, AU
22	2. Existing data and knowledge, paragraph 3, page 7	Pre investigation area.	ENDK	Pre-investigation area now used	Signe Brinkløv, AU
23	2. Existing data and knowledge, paragraph 3, page 7	Please omit.	ENDK	Sentence adjusted to exclude the term Energy Island. Now reads: 'Such information is crucial to understanding the potential effects of offshore construction projects and inform related management initiatives.'	Signe Brinkløv, AU

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24	3. Methods and surveys, 3.1. Passive acoustic monitoring, page 7	Please describe study design and why is was set up as it is.	ENDK	We have further elaborated on the study design	Signe Brinkløv, AU
25	3. Methods and surveys, 3.1. Passive acoustic monitoring, page 7	Why? The technical background reports main focus should be to quantify the presence and usage of the entire pre investigation area. Otherwise the report is not applicable for a future commissionaire.	ENDK	We have more thoroughly explained considerations behind the study design and choice of locations for the bat PAM stations.	Signe Brinkløv, AU
26	3. Methods and surveys, 3.1. Passive acoustic monitoring, page 7	Phases are also not relevant anymore and hasn't been for more than a year.	ENDK	Description has been rewritten but still includes the term phase 1 area as this has by our understanding been approved for use by Energinet, is explained in the list of key terms and informed the initial survey design.	Signe Brinkløv, AU
27	Figure 3.1, page 8	Please exclude the project area from the figure. Furthermore the prior statement that the survey program is based upon the position of the Energy island and windfarms seems hard to see on this map as the stations is relatively	ENDK	The second and third paragraph of the comment should be resolved given the elaboration of the choice of locations for bat passive acoustic monitoring stations. We have deleted the term project area and now show the area as 'Phase 1 area of the proposed plan for the program North Sea Energy Island' as per agreement reached by Energinet and NIRAS May 6, 2024. See also reply to comment #26.	Signe Brinkløv, AU

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		<p>randomly distributed throughout the pre investigation area.</p> <p>in addition; the location of windfarms within the pre investigation area has never been know, and they could be placed everywhere within the pre investigation area. furthermore; As the framework has massively changed structure within the past year. In relation to the area designated for an Energy island a specific focus on this is not relevant.</p>			
28	Figure 3.1, legend	Why was it not re-deployed? (in reference to the sentence: The buoy located at NSE-19 came loose during the Fall 2022 survey and was not re-deployed)	ENDK	Due to an evaluation of recurrent trawling activity at that specific location this decision was made together with the marine mammal work package. Now specified in figure legend	Signe Brinkløv, AU
29	Page 9, reference to Figure 0.1	I do not understand why you have figure 0.1 at the beginning of the report, but do not mention it before now. Why not move the figure down to this part of the report?	ENDK	See explanation to comment #2, figure has been moved as suggested, is now figure 3.2.	Signe Brinkløv, AU
30	3. Methods and surveys, 3.1. Passive acoustic monitoring,	Then why mention it, if it is not used in this report? If not included, then it is not an addition. (in reference to the sentence: In addition, Energinet has two LiDAR buoys also equipped with	ENDK	<p>Deleted.</p> <p>The rationale behind including this information was that data from these may be a potential valuable addition for future commissioners and that this data was initially</p>	Signe Brinkløv, AU

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	Final paragraph, page 9	bat detectors deployed in the pre-investigation area. These have currently not been recovered and their data are not included in this report.		planned to be part of the report as outlined in the project scoping report by NIRAS/DCE. Data from these have been requested but not made available to DCE.	
31	3. Methods and surveys, 3.1. Passive acoustic monitoring, Final paragraph, page 9	Is it 'pre investigation area' or pre-investigation area? What has been done in the other technical reports?	ENDK	This specific case is irrelevant as the paragraph will be deleted as per the reply to comment #30. This report uses pre-investigation area throughout.	Signe Brinkløv, AU
32	3. Methods and surveys, 3.1. Passive acoustic monitoring, Final paragraph, page 9	Has data been correlated with wind data?	ENDK	No, as we did not record any bat activity, we question the relevance of attempting to correlate no activity with modelled hind casts.	Signe Brinkløv, AU
33	4.2. Spring 2023 survey, Page 10	Did the station NSE9 in the fall 2022 survey also become flooded?	ENDK	No, as described in section 4.1, one of the memory cards at this station became faulty during the deployment, which caused the recorder to become inactive.	Signe Brinkløv, AU
34	4.2. Spring 2023 survey, Page 10	Was this not done for the survey in fall 2022? If so, why not?	ENDK	The sensitivity of the microphones was within the recommended manufacturer range at deployment and recovery for both the Fall 2022 and Spring 2023 survey, this is now specified in text.	Signe Brinkløv, AU

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35	5. Status	NIRAS/ DCE has in their BAFO suggested a sufficient survey program to identify the presence of Bats. It is not acceptable to disclaim the result based on a setup recommended by NIRAS/DCE. This conclusion cannot be acceptable as it renders the survey unusable. There has been 14 PAM stations in the area for the duration of 2 year with and addition of further 5 stationer the last year. Every chance was there to suggest a survey program with more stations surveyed for two years.	ENDK	<p>We have elaborated on the general limitations of bat PAM in the methods section.</p> <p>DCE is certainly not disclaiming the results. We did not register any bat activity during the effected monitoring periods and the time frame given for the bat monitoring. We have adjusted the text to make it more clear that based on the results of this survey, we assess the bat activity in the pre-investigation area and extended survey area to be low or potentially absent.</p> <p>It is, however, due caution to be upfront about limitations of the method, which is no less reliable than in other offshore bat PAM surveys. As also stated in the report, passive acoustic monitoring is the most cost-effective, widely used and realistic approach to offshore (and in the majority of cases onshore) large scale bat monitoring.</p> <p>Even with three times as many stations, coverage would still be minute relative to the size of the overall area, this is a consequence of the method in general.</p>	Signe Brinkløv, AU
36	5. Status	Energinet has several times during the contract period asked NIRAS/DCE whether or not the bat detectors where suitable for the rough conditions in the North Sea and has only been assured in this. At the	ENDK	<p>Please see reply to comment #35</p> <p>We welcome documentation of a completely stable sensitivity over time for the devices used in the sister project if this is available.</p>	Signe Brinkløv, AU

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	sister project in the Baltic Sea, bat detectors has also been mounted on the PAM stations, with no issues with the detectors, let alone no intake of water and hence this impaired sensitivity. Such disclaimers are not acceptable as it has been the responsibility of NIRAS/DCE to design and conduct a sufficient setup and survey campaign.				
37	5. Status	When you write it like this, it sounds like the data that we have got from the PAM is very uncertain. Please try to rewrite it.	ENDK	Section rephrased, please also see reply to comments #35 and #36.	Signe Brinkløv, AU
38	6. Data knowledge and gaps	This needs to be rewritten so it does not sound like that the data that has been reached by the survey program is useless. Now it sounds like that you made a survey program that you already (before using the survey program) knew would not be enough....	ENDK	please see reply to comments #35 and #36. The statement commented on concludes that we cannot exclude the occurrence of bats in the area. This is hardly equal to the survey program being useless. We have adjusted the text to make it clear that the absence of bat recordings does not indicate heavy activity. DCE refrains from commenting on the accusation included in the latter half of this comment.	Signe Brinkløv, AU
39	6. Data knowledge and gaps	Why do we need to assume that? I would like you to come with the arguments instead of just saying that we need to assume it. (in reference to	ENDK	References added and paragraph rephrased.	Signe Brinkløv, AU

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	the sentence: Until otherwise established, we must assume that bats have the same behaviour around offshore wind turbines, or even an increased tendency for attraction - and collision risk - in extremely open habitats such as marine waterbodies, where turbines could serve as acoustic beacons (e.g., landmarks.)				
40	7. References, Brabant et al.	This reference is written in another way than the other references. b	ENDK	Reference corrected to follow format of the rest.	Signe Brinkløv, AU