



Morven South Offshore Wind Array Project

Habitats Regulations Appraisal

**Volume 3, Chapter 3: Outline Compensation
Implementation, Monitoring and Adaptive
Management Plan**

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Glossary

Term	Meaning
The Morven North Offshore Wind Array Project (hereafter 'Morven North')	The Morven North Offshore Wind Array Project which includes the wind turbines and foundations, offshore substation platforms (OSPs) and foundations, inter-array and interconnector cables, offshore substation platforms and associated infrastructure located within the Morven North Boundary. Consent for the export cables for Morven North will be sought separately.
The Morven South Offshore Wind Array Project (hereafter 'Morven South')	The Morven South Offshore Wind Array Project, which includes the wind turbines and foundations, Offshore Substation Platforms and foundations, inter-array and interconnector cables and associated infrastructure located within the Morven South Boundary. Consent for the export cables for Morven South will be sought separately.
Appropriate Assessment	An assessment completed by the Competent Authority to determine the implications of a plan or project on a European site in view of that site's conservation/management objectives. An Appropriate Assessment forms part of the Habitats Regulations Appraisal (HRA) and is required when a plan or project (either alone or in-combination with other plans or projects) is likely to have a significant effect on a European site.
Biosecurity Plan	A plan that details the long-term biosecurity protocols to be implemented post-eradication, including but not limited to features such as: permanent monitoring stations, trail cameras, waste management protocols and engagement with stakeholders (e.g. ferry operators). The plan will be a live document, maintained and updated throughout the lifetime of the project.
Eradication Operational Plan	A plan that includes details of all aspects necessary to deliver successful eradication, including, but not limited to: timeframes, contingencies, logistics, and the practical aspects of the eradication. The plan will be a live document, maintained and updated throughout the eradication process.
Habitats Regulations	The Conservation (Natural Habitats, & C.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017, and the Conservation of Offshore Marine Habitats and Species 2017.
Special Protection Areas (SPA)	Special Protection Areas are sites that are designated to protect rare or vulnerable birds (as listed on Annex I of the Directive 2009/147/EC on the conservation of wild birds), as well as regularly occurring migratory species.

Acronyms

Acronym	Meaning
AEOI	Adverse Effect on the Integrity
CEP	Compensation and Evidence Plan
CIMAMP	Compensation Implementation, Monitoring and Adaptive Management Plan
CSP	Critical Situation Permit
HSE	UK Health & Safety Executive
JNCC	Joint Nature Conservation Committee
MD-LOT	Marine Directorate Licensing - Operations Team

Acronym	Meaning
MRF	Marine Recovery Fund
RAMS	Risk Assessment and Method Statements
RSPB	Royal Society for the Protection of Birds
SMP	Seabird Monitoring Programme
SOPs	Standard Operating Procedures
SPA	Special Protection Areas
UAVs	Unmanned Aerial Vehicles

1 Outline Compensation Implementation, Monitoring and Adaptive Management Plan

1.1 Introduction

- 1.1.1.1 This document sets out the outline for the detailed Compensation Implementation, Monitoring and Adaptive Management Plan (CIMAMP) that will be fully developed by Morven North and Morven South following award of consent and agreement on the requirement for compensation. The CIMAMP will detail the delivery proposals for the compensatory measures, in view of the Appropriate Assessment findings and the outcome of consultation with key stakeholders.
- 1.1.1.2 The CIMAMP will be developed in accordance with the Compensation and Evidence Plan (CEP), which is being submitted as part of the derogation case for Morven North and Morven South. The CEP provides Scottish Ministers with detailed information on the following proposed compensatory measure:
- Eradication of rats from the Isle of Muck and its offshore islets, (hereafter the “Muck island group”);
- 1.1.1.3 The CEP will be updated during the determination phase to include further detail on a gannet compensation measure which the Applicant is progressing.
- 1.1.1.4 If additional measures should be required, such as adaptive management, for example, the potential for these to be delivered as developer-led, wider strategic compensation measures will be explored. These could also potentially be delivered via the Marine Recovery Fund (MRF), once it is implemented.
- 1.1.1.5 The production of the final CIMAMP is expected to be a condition of the Morven North and Morven South section 36 consents.

1.2 Compensation Implementation, Monitoring and Adaptive Management Plan Structure

- 1.2.1.1 The CIMAMP will be structured as follows:
- Section 1.3: Background, including aims, objectives and project status;
 - Section 1.4: Consultation relevant to this Plan;
 - Section 1.5: sets out the approach to the eradication of rats from Isle of Muck, including:
 - scale;
 - implementation and delivery mechanism;
 - biosecurity and incursion response;
 - monitoring and success criteria;
 - adaptive management options;
 - reporting.
 - Section 1.6: Gannet compensation measures;
 - Section 1.7: Strategic compensation in the context of this Plan.

1.3 Background

- 1.3.1.1 This section will contextualise the CIMAMP, explaining its purpose, aims and objectives, and the latest project status.

1.4 Consultation

- 1.4.1.1 This section will summarise all consultations with relevant stakeholders during the development of the CIMAMP, including key decisions and agreements made throughout the development of the CIMAMP.
- 1.4.1.2 A list of key stakeholders will be developed post consent, but these are expected to include NatureScot, relevant landowners (for both Muck and in relation to gannet compensation), Marine Directorate Licensing - Operations Team (MD-LOT), and Royal Society for the Protection of Birds (RSPB).

Table 1.1: Summary of consultation during Compensation Implementation, Monitoring and Adaptive Management Plan development

Date	Consultee and communication method	Topics covered

1.5 Eradication of rats from the Isle of Muck

1.5.1 Background

- 1.5.1.1 The proposed compensation measure for the Isle of Muck is the eradication of invasive non-native brown rats, (*Rattus norvegicus*), from the Isle of Muck (and offshore islets, Lamb Island, Horse Island and Eagamol; see Figure 1.1), which is expected to increase breeding success and recruitment of the following target species known to occur on the Isle of Muck: black-legged kittiwake (*Rissa tridactyla*), common guillemot (*Uria aalge*), Atlantic puffin (*Fratercula arctica*), and razorbill (*Alca torda*).
- 1.5.1.2 Brown rats influence these species' colonies by preying on eggs, chicks, and adults; altering the distribution of breeding colonies; and changing their nesting habitat. Full details of supporting evidence to support the proposed compensation at the Isle of Muck is set out in Volume 3, Chapter 2: Compensation and Evidence Plan.

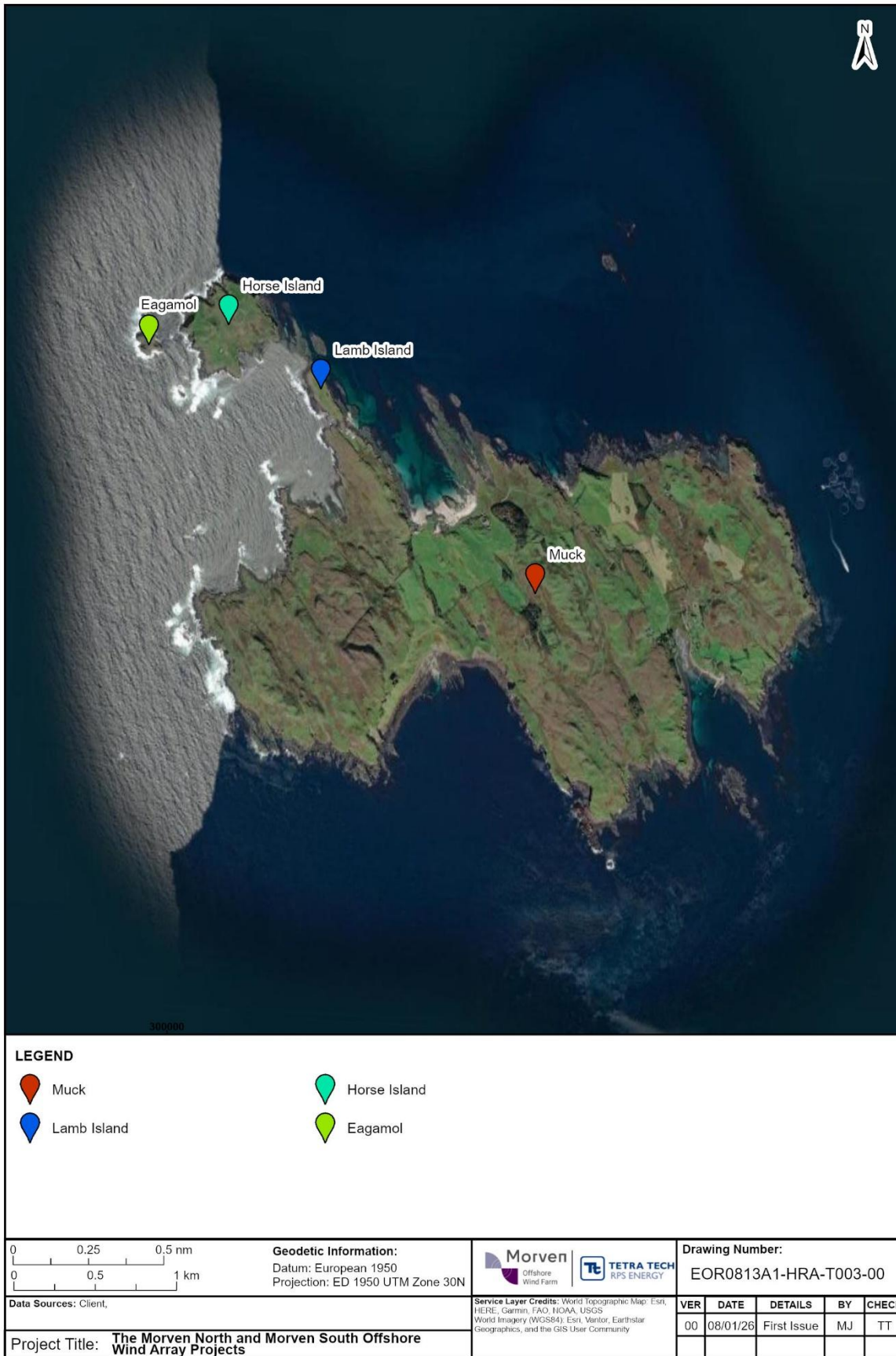


Figure 1.1: Isle of Muck

1.5.2 Scale

- 1.5.2.1 This section will summarise the scale of required compensation and the anticipated level to be delivered by the Muck rat eradication as set out in Volume 3, Chapter 2: Compensation and Evidence Plan.

1.5.3 Implementation and delivery mechanism

- 1.5.3.1 This section will summarise the best practice guidance for conducting a rat eradication programme which will be adhered to for the proposed campaign (e.g. The UK Rodent Eradication Best Practice Toolkit (Thomas, *et al.*, 2017)).

- 1.5.3.2 The eradication programme on the Isle of Muck will be a ground-based operation using rodenticide deployed in bait stations. An Eradication Operational Plan will be prepared in accordance with international best-practice guidelines and scoped to minimise eradication failure. The plan will include details of all aspects necessary to deliver successful eradication, including timeframes, contingencies, logistics, and the practical aspects of the eradication. The plan will account for the steps taken from Morven North and Morven South's grant of consent to the completion of the rat eradication. The Eradication Operational Plan will be continuously updated as the project progresses, incorporating new insights and adapting to any challenges identified.

- 1.5.3.3 This section will comprise a summary of the Eradication Operational Plan (which will be included as an appendix to the CIMAMP). Aspects considered will include (but not be limited to):

- development of safe access and working protocols, and necessary training requirements;
- further confirmation of rat presence and abundance through the island group, including locations not previously accessed for trapping (i.e. Horse Island and Eagamol);
- targeted rat trapping in the harbour areas with connectivity to Muck (Rum, Mallaig and Eigg) to establish baseline data for rat populations at key ports and routes of entry to Muck;
- trial of bait delivery systems to test acceptance of bait stations with differing entrance sizes;
- completion of up-to-date rodenticide resistance testing prior to final bait selection to confirm the effectiveness of the selected bait formulation against the population present on Muck. An environmental risk assessment and mitigation plan for non-target species risks must underpin the final selection decision;
- completion of baseline ecological monitoring, to include vegetation/habitat surveys, invertebrate surveys, amphibian surveys, land-bird surveys, and seabird surveys.
- completion of a non-target species risk assessment;
- the removal of alternative rat food sources and sites of harbourage from the island, including how waste will be managed during the project (in a Project Waste Management Plan as part of the Eradication Operational Plan);
- the management of gamebirds on Muck, and the importance of preventing rat access to gamebird feed in the months prior to the eradication start date;
- field team accommodation and options for storing project equipment during the eradication phase and biosecurity phase;
- initial estimates of bait station densities, numbers and expected quantities of bait.

- 1.5.3.4 There are several licences that are expected to be required to enable the eradication and biosecurity works. Communications with the relevant decision makers for the various licences should be pursued. This section will also include an application to the UK Health and Safety Executive (HSE) for a Critical Situation Permit (CSP), to allow the use of rodenticide outdoors and away from buildings, covering the following:

- The individual licences that may be required, such as 'Licence to use rodenticide', 'Licence to Disturb', 'Licence for off-label use', and 'Waste carrier licence'.
- The type(s) of rodenticide for which a CSP will be sought.
- All methods of, and locations for, rodenticide bait delivery.
- Target species.
- Purpose.

- Environmental risk assessment, including risks to non-target species and risk management strategy.
- A review of alternative strategies and why rodenticide is to be used instead of these alternative methods.

1.5.3.5 Health and safety considerations are also expected to include:

- rope access methods, for access to cliff areas where vegetation is present that may harbour rats;
- safe transfer of staff and equipment from vessels to offshore islands;
- required supporting Standard Operating Procedures (SOPs) and Risk Assessment and Method Statements (RAMS).

1.5.4 Biosecurity and incursion response

1.5.4.1 This section will outline details of biosecurity measures to be implemented following successful eradication and responses required should predator incursion occur following eradication, as informed by ongoing monitoring (see Section 1.5.7).

1.5.4.2 Biosecurity measures will be put in place during the eradication implementation and will continue for the required duration (i.e. for the full 35 year operational lifetime of Morven North and Morven South) to ensure that the rat-free status of the Isle of Muck is maintained. The long-term biosecurity protocols to be implemented post-eradication will be detailed in a Biosecurity Plan, in accordance with international best-practice guidelines. These will include permanent monitoring stations equipped with wax blocks and trail cameras, effective waste management practices, and ongoing engagement with local stakeholders, such as cargo and passenger boat operators, to ensure their effectiveness.

1.5.4.3 In addition, innovative technologies may be used (as required), such as thermal Unmanned Aerial Vehicles (UAVs), sim-enabled trail cameras, and conservation detection dogs, to support monitoring across the Isle of Muck.

1.5.4.4 The Biosecurity Plan, as with the Eradication Operational Plan, will be a live document that will be continuously updated and reviewed in consultation with stakeholders as the project progresses.

1.5.5 Partnership agreements

1.5.5.1 This section will detail agreements with the landowner(s), delivery partners, advisors etc., as applicable. At the time of writing an exclusivity agreement is in place with the land owners.

1.5.6 Success criteria

1.5.6.1 To define the compensation as meeting the requirements as set out in consent conditions, criteria must be established and monitored, during the lifetime of the compensation measure.

1.5.6.2 This section will outline the success criteria for the eradication of rats from the Isle of Muck. These will be discussed and agreed with stakeholders during the development of the final CIMAMP. The criteria that will define the success of a rat eradication programme are expected to comprise:

- Criterion 1 – Total eradication of brown rats from the Isle of Muck;
- Criterion 2 – Increase in seabird nesting distribution (i.e. expansion of use of nesting sites from baseline) across the Isle of Muck in response to rat eradication.

1.5.6.3 Further information relevant to each criterion is presented below, the success of which will depend on the results of monitoring relevant to each criterion. Any incursion response (see Section 1.5.4) or future adaptive management (Section 1.5.8) will be linked to these success criteria, as required to ensure compensation success.

Criterion 1 – Eradication of brown rats

- 1.5.6.4 Monitoring of the measure to assess success against this criterion will follow international best-practice approaches to determine rat-free status. Rat-free status can be declared pending a final check, which is conducted two years after the eradication programme has finished. Criterion one also requires eradication remains successful for the operational lifetime of Morven North and Morven South via adequate biosecurity protocols.
- 1.5.6.5 During post-eradication monitoring and biosecurity, if rodents are detected, it will be important to distinguish between eradication failure and biosecurity failure. Following a rapid incursion response to remove any rats, DNA analysis of the captured rats would be compared with previous samples from Isle of Muck and from potential source locations, such as ports on the mainland (Mallaig). If the rat is determined to have originated from the original Muck island group population, the eradication cannot be deemed a success, and further eradication work will proceed, with the monitoring phase timeline reset. If the failure is that of biosecurity, the incursion will not necessitate a failure of the entire measure, but rather a re-examination of the biosecurity measures with improvements to prevent further incursions. As long as the establishment of a new rat population is prevented, the Isle of Muck can continue to maintain its rat-free status for compensation.

Criterion 2 – Increased seabird nesting numbers and distribution

- 1.5.6.6 Success for this measure will be based on demonstrable increases in the distribution and number of breeding seabirds, where nesting was shown to be previously limited by rat presence. Where there is clear evidence that rat presence is no longer limiting the distribution of seabird nesting on the Isle of Muck, the eradication programme will be considered to have succeeded.
- 1.5.6.7 The precise details of monitoring to be undertaken will be agreed with stakeholders and set out in the final CIMAMP, however, an outline of proposed seabird monitoring to meet this success criterion is set out below.

1.5.7 Monitoring

- 1.5.7.1 To document the benefit of the predator eradication compensation measure and align with the success criteria above, Morven North and Morven South monitoring will be undertaken for the lifetime of the compensation measure.
- 1.5.7.2 The precise monitoring programme (including duration of monitoring and frequency of monitoring (both pre and post eradication)) will be agreed with stakeholders and set out in the final CIMAMP. The following sections set out the broad approach to monitoring of eradication success and island biosecurity and monitoring of key seabird species pre and post eradication.

Monitoring of rat activity

- 1.5.7.3 Monitoring of the rat-free nesting sites post-eradication will be initiated during the eradication operation and maintained continuously, as required, for the lifetime of Morven North and Morven South. Rat presence will be monitored using a range of biosecurity monitoring devices installed across the Muck island group and in high incursion-risk areas, such as ports. Any potential rat incursions will trigger an immediate incursion response to ensure rat-free status is maintained and the biosecurity measures are sufficient.
- 1.5.7.4 Following international best practice, sites will be declared rat-free when they have met two conditions:
- No rats have been detected in an established two-year monitoring phase post-eradication (based on the life expectancy of a wild rat of c.18 months), with checks every four weeks to detect the presence of rats;

- No rats are detected during an established intensive monitoring check following the two-year monitoring phase. This phase will involve deploying a range of monitoring devices across the entire area and checking them every two days for six weeks.

1.5.7.5 Upon successful completion of the two phases, with no rats detected, the area can be declared rat-free.

1.5.7.6 If a rat re-incursion is detected and confirmed, it is vital to respond immediately and launch a full incursion response within 48 hours to prevent a population from becoming established. An incursion response hub will be established with a full stock of necessary biosecurity equipment to initiate a rapid incursion response, including baiting and trapping tools to remove the rats as quickly as possible. Biosecurity procedures would also be re-examined to ensure all measures are sufficient to prevent further re-incursions.

1.5.7.7 Monitoring of rat presence on the Muck island group via permanent monitoring stations (e.g. wax blocks or trail cameras) will continue, as required, post-eradication and throughout the operational phase of Morven North and Morven South to measure eradication success, identify barriers to success, and inform whether adaptive management measures should be considered. Alongside standard monitoring methods, other innovative methods may be used (as necessary), including thermal drone surveys and detection dog searches.

Seabird monitoring

1.5.7.8 Alongside monitoring for rat activity on the Isle of Muck, seabird monitoring will also be undertaken to demonstrate increases in the distribution of breeding seabirds, where nesting was shown to be previously limited by rat presence. Further pre-eradication monitoring is expected to be completed before the eradication start date to establish a current baseline count of seabirds and confirm distribution of nesting habitat around the Isle of Muck. Following eradication, seabird population monitoring at the Isle of Muck will be implemented in line with methods used in pre-eradication surveys, with surveys commencing from the first breeding season following eradication.

1.5.7.9 The precise scope of surveys will be developed and agreed with stakeholders during the development of the CIMAMP (and with reference to success criteria), though key data to be collected is expected to include data on sites where key seabird species currently nest, based on baseline surveys, or have the potential to nest in the future (as established during the feasibility studies).

1.5.7.10 For each seabird species to be surveyed, methods will follow those outlined in the Joint Nature Conservation Committee's (JNCC) Seabird Monitoring Handbook (Walsh *et al.*, 1995) and in line with the JNCC's Seabird Monitoring Programme (SMP). Where necessary, some adjustments to methods may be required based on the topography, accessibility/observability of each nesting site, and disturbance concerns for nesting birds. Data collection will be carried out by at least two trained observers to meet Health and Safety requirements.

1.5.8 Adaptive management

1.5.8.1 The CIMAMP will adopt a pragmatic approach to determine whether adaptive management actions are necessary as informed by ongoing monitoring (section 1.5.7) and degree of success (Section 1.5.6) of the eradication programme. It should be noted that adaptive management associated with rat eradication and potential incursion following eradication are considered in Sections 1.5.4 and 1.5.7 above.

1.5.8.2 Adaptive management will be an iterative process which combines management measures and monitoring with the aim of improving and maximising the effectiveness of the measure, whilst also updating knowledge and improving decision making over time, through monitoring and review. Adaptive management will be an important component of this compensation measure and will be used as a method to address unforeseen issues or deviations from expected outcomes of the compensation. Any potential adaptive measures which could be employed for this compensation

measure would be discussed and agreed with stakeholders although these may include the following, depending on site specific considerations and monitoring outcomes:

- Habitat modifications to improve quality of nesting habitat for key species;
- Working with communities to implement measures to reduce disturbance from recreational activities (both via land and sea);
- Enhanced recruitment support – audio lures, decoys etc.

1.5.8.3 The likely trigger points for the application of adaptive management will relate to the degree of success of the eradication and subsequent increases in seabird nesting distributions in the Isle of Muck. These trigger points (which would include consideration of temporal triggers) would be discussed and agreed with stakeholders as part of the development of the final CIMAMP.

1.5.8.4 Separately from adaptive options related to the proposed rat eradication on the Muck islands, and only if required, wider adaptive management, potentially delivered collaboratively with other developers or strategically through the MRF, may also be given consideration as appropriate.

1.5.9 Reporting

1.5.9.1 Details of the reporting schedule and anticipated report content will be set out here.

1.5.10 Programme for implementation and delivery

1.5.10.1 The precise programme for implementation and delivery of the compensation measures will be discussed and agreed with stakeholders as part of the final CIMAMP. The intention is that the eradication would be complete before Morven North and Morven South are operational. An indicative programme is set out as follows:

- Year 1: Continuing landowner engagement; consultation and engagement with wider stakeholders; survey planning and permissions; pre-eradication planning.
- Year 2: Pre-eradication planning including consultation on the draft CIMAMP; field surveys.
- Years 2-3: Development of final CIMAMP and Eradication Operation Plan, including planning, detailed design, health safety and environment planning; development of specific plans for waste management, health and safety, non-target species management, biosecurity during and post eradication etc.; bait and delivery system testing.
- Years 4-5: Eradication implementation: field preparation including track cutting, grid layout, baiting, trapping; pre, during and post eradication monitoring.
- Year 6: Declaration of predator free status: 2 years following eradication completion.
- Years 6+: Long term monitoring and biosecurity for operation phase of Morven North and Morven South.

1.5.11 Discharge of consent condition

1.5.11.1 This section will set out how, based on the content of the CIMAMP, it is proposed that the Scottish Ministers can discharge the condition relating to the delivery of the compensation required to offset identified Adverse Effects on Integrity (AEOI) on relevant Special Protection Areas (SPAs).

1.6 Gannet compensation measures

1.6.1 Scale

1.6.1.1 This section will summarise the scale of required compensation and the anticipated level to be delivered by the gannet compensation measures, as will be set out in the updated CEP.

1.6.2 Implementation and delivery mechanism

1.6.2.1 The proposed methods to deliver the required compensation will be set out. This will include information on timing of activities (e.g. during the breeding or non-breeding season), frequency of management activities (e.g. annual, monthly etc.).

1.6.3 Partnership agreements

1.6.3.1 Details of agreements with the landowner(s), delivery partners, advisors etc.

1.6.4 Success criteria and monitoring

1.6.4.1 To define the compensation as meeting the requirements as set out in consent conditions, criteria must be established and monitored, during the lifetime of the compensation measure.

1.6.4.2 This section will outline the success criteria for the gannet compensation measures. These will be discussed and agreed with stakeholders during the development of the final CIMAMP.

1.6.5 Adaptive management

1.6.5.1 The CIMAMP will adopt a pragmatic approach to determine whether adaptive management actions are necessary as informed by ongoing monitoring and degree of success (Section 1.6.4) of the proposed measures.

1.6.6 Reporting

1.6.6.1 Details of the reporting schedule and anticipated report content.

1.6.7 Programme for implementation and delivery

1.6.7.1 Proposed timetable.

1.6.8 Discharge of consent condition

1.6.8.1 This section will set out how, based on the content of the CIMAMP, it is proposed that the Scottish Ministers can discharge the condition relating to the delivery of the compensation required to offset identified AEOI on relevant SPAs.

1.7 Strategic compensation and adaptive management

1.7.1.1 This section will provide an update on the status of strategic compensation options which may replace or supplement the project specific measures discussed above. If strategic compensation, potentially delivered via the MRF, is a realistic option for Morven North and Morven South (e.g. as adaptive management or supplementary measures for project-led measures) then it will be discussed in the CIMAMP in a similar manner to that outlined for the project-led measures. The potential for collaboration on wider measures with other developers will also be explored as necessary and appropriate.

2 References

Thomas, S., Varnham, K. & Havery, S. (2017) UK Rodent Eradication Best Practice Toolkit (Version 4.0). Available at: <http://www.nonnativespecies.org/index.cfm?pageid=613> Royal Society for the Protection of Birds, Sandy, Bedfordshire. (Accessed: February 2026)

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