



John Swinney MSP
First Minister
Scottish Government, St Andrew's House
Regent Road, Edinburgh, EH1 3DG
(by e-mail)

22nd October 2025

Dear First Minister,

Don't fast track Scotland's seabirds to extinction - Reconsider Berwick Bank

Our organisations, who together represent hundreds of thousands of people across Scotland, write to strongly oppose the approval of Berwick Bank Offshore Windfarm and to urge your government to reverse this damaging decision and protect the future of Scotland's internationally important seabirds.

In our letter of 24 April 2025, we called for refusal of Berwick Bank due to its unacceptable ecological impacts and highlighted how the same amount of energy could be generated by much less damaging developments instead. We were devastated by the decision to grant Berwick Bank consent on 31 July. This development is projected to kill 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills in the first year alone, and tens of thousands more over its lifetime. This is against a backdrop of 70% of our seabird species being in decline.

This is a huge setback for Scotland's natural heritage and raises grave concerns about your government's commitment to a nature-positive offshore wind sector and the broader protection and recovery of Scotland's wildlife. While we continue to support the growth of offshore wind in Scotland, it cannot be at any cost. Berwick Bank is a legacy site, proposed by the then UK Crown Estate, dating back to at least 2010. Since then, numerous lower-impact projects have come forward. It is proposed in vital feeding grounds for seabirds from iconic sites like the Bass Rock, the Isle of May and St Abb's Head. Its impacts are so severe, it could fast track species like Kittiwake to local, or even national, extinction. Berwick Bank is set to be the deadliest windfarm for birds we are aware of anywhere in the world. This is not the kind of global leadership any of us would wish Scotland to be known for.

Where possible, our organisations will continue to engage with offshore wind developments that can be progressed in a nature-positive way, and to advise on effective national strategic compensation and enhancement. However, we have significant scientific concerns that the level of compensation needed to correct the

damage from Berwick Bank is not feasible to deliver, such is the ecological devastation predicted if the project proceeds as currently proposed. We will therefore continue to campaign to stop the project unless and until the scale of forecast nature loss can be prevented, and we will not take any action that would see Berwick Bank delivered without these protections being in place.

We reiterate our commitment to working constructively with government and industry to deliver much-needed offshore wind that supports climate goals while protecting Scotland's outstanding wildlife.

We would very much like to meet with you about the issues raised and to consider how to work together to get Scotland's offshore wind sector back on a nature positive trajectory.

Earlier this year, you said: "Nature must be at the very heart of our climate actions." We hope you meant it.

Yours sincerely

Anne McCall, Director of RSPB Scotland

Diarmid Hearn, Interim Director of Conservation and Policy at National Trust for Scotland

Calum Duncan, Head of Policy and Advocacy at the Marine Conservation Society

Harry Huyton, CEO at the Scottish Seabird Centre

Jo Pike, Chief Executive at the Scottish Wildlife Trust