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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
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Bureau of the Standing Committee
16-18 September April
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**Recommendation No. 200 (2018) on the windfarms planned
near Balchik and Kaliakra, and other wind farm
developments on the Via Pontica route (Bulgaria)**

- REPORT BY THE GOVERNMENT -

*Document prepared by
The Ministry of Environment and Water of Bulgaria*

Update Report dated August 2025



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

Wind farms planned near Balchik and Kaliakra
– Via Pontica (Bulgaria) –
Progress since December 2022

15 August 2025

I. Introduction

The Case ‘Windfarms planned near Balchik and Kaliakra – Via Pontica (Bulgaria)’ has been monitored by the Bureau and Standing Committee of the Bern Convention for years and, as part of this process, Recommendation No 130 (2007) has been issued.

At its 37th meeting held in December 2017, taking into account the judgment of the Court of Justice of the European Union, delivered on 14 January 2016 on case C-141/14 (Kaliakra), the Standing Committee assigned to the Secretariat to organize an on-the-spot appraisal (OSA) to assess the need to update Recommendation 130 (2007).

At its 38th meeting held in November 2018 the Standing Committee adopted Recommendation No 200 (2018) on planned wind farms near Balchik and Kaliakra and other wind farms on the Via Pontica (Bulgaria) route, which is based on the results and the recommendations formulated by the on-site mission held in May 2018.

At the 42th meeting held in November –December 2022 the Standing Committee with general support from Contracting Parties decided to close the file as it had been on the agenda for so long and due to the willingness of the authorities to implement the Recommendation. However, there was also a strong call to follow-up with this case as a closed file with biennial monitoring, as it was agreed that some results would only be seen in a few years, and also that the government should ensure better collaboration with civil society and scientific community, taking the initiative to invite the complainant and other relevant stakeholders to discussions.

Therefore, **the file was closed** and both parties were requested to send a progress report related to the progress in fulfilment of Recommendation 200 (2018) at the 44th Standing Committee, providing it on time for the Autumn Bureau meeting in 2024 to pre-screen it.

II. Implementation of Recommendation No 200 (2018)

Recommendation to the Bulgarian Government:

- 1. The comprehensive independent assessment of the impact of operational windfarms in the Kaliakra area which was recommended by the Bern Convention Standing Committee in 2015 (amplifying paragraph 5 of Recommendation No. 130 of 2007) should be undertaken without delay, according*

to scientifically appropriate methods to be agreed in advance. It should include information from the current collision mortality monitoring but should also address other impacts such as displacement, barrier effects, disturbance and habitat change; and it should arrange to draw on collaborative sharing of information between windfarm operators, regional authorities, NGOs, academic researchers and others. An interim report of the results should be transmitted to the Bern Convention Bureau before February 2019, and a final report before August 2019;

2. *A broader regime for on-going monitoring and assessment of potential impacts of the Kaliakra area windfarms during their operation should be developed, ensuring that it inter alia:*
 - *follows scientifically appropriate methods agreed in advance,*
 - *addresses all types of potential impacts, including collisions, disturbance, displacement, barrier effects and habitat changes,*
 - *includes observations at both windfarm sites and comparable areas with no windfarm developments, so as to provide 'control' comparisons,*
 - *is coordinated across all the Kaliakra installations,*
 - *is undertaken in conjunction with research by NGOs, supported by data-sharing agreements,*
 - *takes the opportunity to undertake related research where it would be appropriate and cost-effective to associate this with the field efforts already being made on monitoring and assessment,*
 - *makes information about the methods and systems used available in a form which would allow these to be replicated at other windfarm sites elsewhere,*
 - *feeds results and insights (through the authorities) into national processes for planning and assessment of future developments;*

Implementation:

Implemented

Bulgarian government has provided to the Standing Committee by its progress reports from 19 February 2020, 23 July 2020, and 23 November 2020 the following reports elaborated under contract No Д-30-45 from 10.06.2019 by independent expert with professional qualifications and practical experience in analysing available data on bird species and expertise in field studies of bird species, as follows:

1. Report on the Methodology for Assessing accessible information on the Impacts of Wind Energy Development on Birds in the Region of Kaliakra, Bulgaria,
 2. Report on the Methodology for a monitoring of the Impacts of Wind Energy Development on Birds in the Region of Kaliakra, Bulgaria, and
 3. Final Report on the Impacts of Wind Energy Development on Birds in the Region of Kaliakra, Bulgaria.
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3. *Windfarm operators and other land owners, managers and authorities should explore options for creating conservation gains for migratory birds and habitats in or around the Kaliakra area (e.g. through habitat creation/restoration and management investments, designation of additional protected areas, etc), as a way of aiming partially to offset the risks and/or damage introduced by the completed windfarm developments, and/or in any event to contribute to agreed conservation priorities;*

Implementation:

Following a proposal submitted by BSPB (Bulgarian Society for the Protection of Birds), by the order No ПД- 896 from 17 Oct. 2024 of the Minister of Environment and Water the ban for construction of wind turbines was spread also over the marine area of the SPA BG0002051 "Kaliakra". Given this, no additional electricity generation capacity can be built in the whole Natura 2000 site.

Additionally, the Minister of Environment and Water issued Order No ПД -895 from 17 Oct. 2024 for

amendment on the bans and restrictions imposed by the Order No ПД -815 from 12 Dec. 2017 for the designation of a protected area BG0000573 “Kaliakra Complex” (SG, issue 100 of 2017). The imposed ban and restrictions relate to the installation of movable structures and elements of street furnishings within the meaning of the Spatial Development Act (SDA) in the area of distribution of a natural habitat 62C0 * Ponto-Sarmatian steppes, as defined by the coordinate register pursuant to Appendix No. 3 to Order No. ПД-815 of 12.12.2017 of the Minister of Environment and Water (SG, issue 100 of 2017), as well as initiation, implementation, or continuation of procedures under the Environmental Protection Act, the Biodiversity Act, the Agricultural Land Protection Act, the Property and Use of Agricultural Land Act, the SDA, and the respective secondary legislation, which constitute a prerequisite for the installation of movable structures and elements of street furnishings within the meaning of the SDA.

In April 2023 a project was launched under the Operational Program "Environment 2014 - 2020" - BG16M1OP002-3.022 named ‘Improving the environmental protection status of steppe natural habitats by purchasing land’.

The purpose of the project was to ensure permanent preservation and improvement of the conservation status of priority habitat type 62C0* Ponto-Sarmatian steppes, by purchasing properties of individuals and legal entities in Natura 2000 site BG0000573 “Kaliakra Complex”. The procedure has a direct contribution to the objectives of priority axis 3 of the operational program "Environment 2014-2020", which during the program period was aimed at implementing measures from the National Prioritised Action Framework (NPAF) for Natura 2000 for the multi-annual financial period of the European Union 2014-2020.

In that frame the Regional Inspectorate for Environment and Water (RIEW) – Varna has completed work as a beneficiary under the project: “Improvement of the nature conservation status of steppe natural habitat 62C0 in protected site BG0000573 “Kaliakra Complex” through land purchase”. An information campaign was conducted in the targeted municipalities – Balchik, Kavarna and Shabla, to inform stakeholders about the land purchase procedure. Within the administration of the RIEW-Varna, a contact point has been established in connection with incoming inquiries regarding submission of applications under the procedure. Two public procurements have been conducted and contractors have been selected for the activities of preparing independent market valuations of real estate and legal services for the project. Field inspections of the on-site survey of steppe natural habitat 62C0* within the scope of protected site BG0000573 "Kaliakra Complex" have been carried out. The necessary activities were carried out to collect documents for the property purchase project and opinions were prepared for draft decisions of the Council of Ministers. Given the expired payment period for the project and the presence of unfinished deals, upon announcement of a new procedure for direct provision of BFP under POS 2021 - 2027, RIEW-Varna will make proposal that all approved properties, for which documents are collected be directly included in the new procedure.

This was a pilot procedure, and its results will be analyzed and taken into account when announcing following procedure for purchase of lands under the "Environment 2021-2027" program, as provided for in the National Prioritised Action Framework for the period 2021-2027.

Additional measures and activities are outlined in point 9

4. *4. The conservation impact achieved by measures undertaken in response to point (3) above should be thoroughly evaluated, and if judged in any way to be less successful than hoped, or if the exploration of options itself has not advanced significantly within one year of the date of the present Recommendation, then alternative options for removal of existing operational wind turbines from Kaliakra should be investigated and implemented as appropriate;*

Implementation:

Implemented

Since 2018 in the region of Kavarna operates INTEGRATED SYSTEM FOR BIRDS PROTECTION (ISBP). ISBP is applied by all Windfarms on the territory of SPA Kaliakra and operates all year around, including during the spring and autumn migrations as well as registered migrations in search for foraging grounds, leading to high concentrations of birds. To ensure transparency of the research conducted, operates a systematically updated website (<https://kaliakrabirdmonitoring.eu/>). Weekly and monthly newsletters, seasonal and annual reports are published on the website. All reports are published in Bulgarian and English, in order to be shared and further used by a wide range of stakeholders, including leading European experts

and researchers. The website also provides opportunities for feedback.

The latest available Annual Summary Reports are for 2023 and 2024.

The data presented in both reports show the absence of any adverse impact on sensitive bird species from the orders Ciconiiformes, Pelecaniformes, Falconiformes, Gruiformes, using thermals for their long-distance flights. The presented quantitative characteristics of bird migration in the ISPB area during spring and autumn migrations in 2023 and 2024, and the absence of mortality among the target bird species are based on continued conclusion that existing wind farms in the SPA do not present a risk of adverse impact to migratory birds.

In conclusion, the implementation of the ISPB is an ongoing part of the contribution to minimizing the risk to birds from wind farms in the Kaliakra area.

5. *The successor plan to the Bulgarian National Renewable Energy Action Plan 2011-2020 should re-confirm (and enhance where necessary) the latter's prohibition on wind energy developments in sensitive locations;*

Implementation:

Following the expiration of the National Action Plan for Renewable Energy Sources (NAPRES 2011-2020), a draft Strategy for Sustainable Energy Development (SSED) of the Republic of Bulgaria by 2030, with a horizon 2050, and a draft Integrated National Energy and Climate Plan (INECP) of the Republic of Bulgaria by 2030, commissioned by the Minister of Energy, were developed. In 2019, a procedure was determined pursuant to environmental legislation – a Strategic Environmental Assessment (SEA), within which an Appropriate Assessment (AA) is also conducted to evaluate compliance with the conservation objectives and subject matter of the protected sites within Natura 2000 ecological network. In 2021, during the procedure, the Strategic Environmental Assessment Report received two negative quality evaluations following a thorough analysis by experts from the Ministry of Environment and Water. The commissioning party did not respond to the findings associated with the negative evaluations nor submitted a revised document, resulting in the termination of the procedure. Meanwhile, in 2023, an amendment to national legislation was enacted, obliging the Minister of Environment and Water to prepare an update of the INECP. This strategic document replaces the NAPRES and ensures that its environmental aspects will be addressed in a broader and more comprehensive manner.

Currently, the Ministry of Environment and Water is conducting a procedure under Chapter Six of the Environmental Protection Act (EPA) and Article 31 of the Biodiversity Act (BDA) concerning the draft updated INECP. The applicable procedure is a SEA, within which an AA is conducted in respect to the subject and conservation objectives of the respective Natura 2000 sites.

Moreover, in the context of the particular recommendation, it should be taken into account the fact that the designation orders for SPA „Kaliakra“, SPA “Belite skali” and SAC “Complex Kaliakra”, incl. many more Natura 2000 sites in the country where the prohibitions for construction of new WG are in place and they are not limited in time, which is a definite guarantee, that prohibitions are imposed as a preventive measure where it is necessary, without waiting for the assessment of the strategic document.

6. *The Bulgarian authorities should provide the Bern Convention Bureau with a short report by March 2019 on the specific ways in which the legal provisions, policy requirements, standards, established practices or other aspects of environmental assessments (SEA/EIA/AA) in Bulgaria meet each of the individual points in paragraphs 1, 4, 8 and 9 of Recommendation No. 130 (2007) or will do so in future (with an indication of the expected timeframe), giving particular attention to the points in the Recommendation concerning cumulative assessment and peer review;*

Implementation:

Implemented

Provided in the Progress report presented to 38th Standing Committee meeting.

7. *The Bulgarian authorities should promote the dissemination (including translation where necessary) and use within the country of the guidance on windfarms and birds developed under the auspices of the Bern Convention (Gove et al. 2013), and the international standards and best practice guidance on EIA/SEA adopted under the Conventions on Biodiversity, Migratory Species and Wetlands, together with related materials produced by the International Association for Impact Assessment;*

Implementation:

Implemented

Since 2019 the Ministry of Environment and Water keeps informational documents concerning solar and wind energy development on its website.

9. *The Conservation Action Plan for the Red Breasted Goose population in Bulgaria should be funded and implemented without delay, and periodic summary reports on its implementation should be transmitted to the Bern Convention Standing Committee, beginning with a first report in November 2018. Those responsible for the Plan should ensure that thorough and coordinated monitoring of the species' population status and trends receives sustained high priority attention;*

The Action Plan for the Protection of the Red-breasted Goose (*Branta ruficollis*) in Bulgaria for the period 2018 – 2027, was approved by Order No ПД-355/04.06.2018 of the Minister of Environment and Water.

Two projects are implemented in the frame of procedure under the Operational Program "Environment 2014-2020", as follows:

A. Procedure BG16M1OP002-3.027 'Measures to improve the conservation status of birds – 2'

Project: BG16M1OP002-3.027-0002 "Improvement of the conservation status of the Red-breasted Goose (*Branta ruficollis*, Pallas, 1769) through the implementation of measures from the Action Plan for the species (AP, 2018)".

Implementation start: 04 Jan.2021. End of the project: 4 May 2024.

The main objective of the project is to improve the conservation status of the red-breasted goose (*Branta ruficollis*), in certain Special Protection Areas (target areas), part of the Natura 2000 network in the country.

The specific objectives are:

1. Ensuring adequate environmental protection regimes for the protection of the species based on the study of its ecological requirements, its migration routes and 'bottlenecks' in its life cycle.
2. Providing knowledge about the influence of external pressures on the population of wintering birds - hunting pressure, disturbance and toxic influences.
3. Increasing awareness and nature protection culture of the local population and increasing the sensitivity of the society to the problems related to the species and its conservation, by distributing materials about the species and holding special events.

Targeted Natura 2000 sites:

- BG0002050 Durankulashko ezero - 3 356.0 ha.;
- BG0000156 Shablenski ezero kompleks 3 174.9 ha.,
- BG0002051 Kaliakra 16 171.8 ha.

The main activities of the project are:

- Activity No. 1: Conducting specialized studies and research related to the Red-breasted Goose - 1st stage.
 Activity No. 2: Conducting specialized studies and research related to the Red-breasted Goose – 2nd stage.
 Activity No. 3: Capacity building for distressed bird rescue operations through infrastructure measures.
 Activity No. 4: Engaging the general public in the conservation of the Red-breasted Goose - promoting the species and its conservation through production and distribution of printed materials.
 Activity No. 5: Engaging the general public in the conservation of the red-breasted goose - organizing and holding festivals related to the species.

Results

Study of the species' migration routes and identification of "bottlenecks" in the life cycle within the framework of the international working group on the conservation of the red-breasted goose were carried out. Captured geese were fitted with GPS transmitters. The tracking was aimed to identify important places on the species' migration route and the problems associated with them. The study was carried out along the entire migration route of the species with the participation of the International Working Group (IWG) for the species under (AEWA).

Specialized studies were carried out also on local migration between the roosting sites and foraging areas. During the study conducted from May 2022 to March 2023 a number of 87 479 GPS location had been received. This data help for understanding the foraging migration and can be useful in the process of planning the conservation measures.

During the project an assessment was made on disturbance and the risk of killing in the hunting period of 2022-2023. Due to the low presence of geese in the area during the study the Hunting pressure was qualified as insignificant for the period. The registered presence of birds in the winter of 2022-2023 is lowest comparing to the monitoring data collected since the beginning of the monitoring in the area in 90th. The wintering Red-breasted Geese were observed and counted only in February 2023 in number between 55 -660 individuals.

The analyses conducted in respect to the toxic influences, mainly lead (Pb) and pesticides, in the region are not clear and explicit, but the conclusion made by the experts is that there is a possibility some individual birds to be poisoned.

Rescue and Rehabilitation Center for first aid and temporary accommodation of red-breasted geese was created and equipped for treatment of injured and weak birds.

In Sept. 2023 the III-th Kite Festival was hold in the area of Shabla town, aiming to raise the public awareness on protection of Red-breasted Goose.

Under the project the teaching aid named "With Redbreast at School and in Nature" and the guidelines "Hunter's Handbook", were edited, updated and printed in an edition of 1500 copies, after which it was presented and distributed at one-day trainings for school teachers in the municipalities of Shabla, Kavarna and Balchik.

B. Procedure BG16M1OP002-3.015 'Implementation of priority measures in wetlands':

Project: BG16M1OP002-3.015-0002 "Activities for improvement of the environmental status of the Durankulak Lake and Lake Shabla Wetlands"

Implementation start: 3 Sept.2020. End of the project: 3 May 2024.

main objectives of the project are:

- Limiting the eutrophication processes by reducing the amount of macrophytic vegetation;
- Improving the condition and trends of the population of the red-breasted goose and providing optimal conditions for wintering;
- Improving the condition of the aquatic ecosystems.

The implemented project activities relate to improving the water regime and limiting the succession processes in the 'Shabla Lake' Ramsar site by building connection with Black Sea are; management of the massifs of hydrophilic vegetation in 'Durankulak Lake' and 'Shabla Lake' Ramsar sites; assessment of the effect of the implementation of the activities for improvement of the water regime and limiting the succession processes and management of the massifs of hydrophilic vegetation, as well as measures to protect the Red-breasted Goose.

Also in accordance with the provisions of the Action Plan for the species, the new National Prioritised Action Framework for Natura 2000 for the period 2021-2027, approved by the European Commission, includes measures aimed at improving the habitats of the Red-breasted Goose.

8 information and marking tables are installed in the main wintering areas of Red-breasted Goose in Durankulak Lake and Shabla Lake, indicating the conservation status of the species and the restrictions regarding hunting in both areas, according to legal requirements.

The border of non-hunting area around Shabla Lake is marked at 350 m distance from the lake.

National Framework for Priority Actions for Natura 2000 for the period 2021-2027:

In accordance with the provisions of the Action Plan for the Conservation of the Red-breasted Goose in Bulgaria, the new National Framework for Priority Actions for Natura 2000 for the period 2021-2027, approved by the European Commission services, contains the following measures aimed the improving the habitats of the species:

- Measure 37: "Improving the condition of bird species habitats through the implementation and transition to organic farming" - the measure is aimed at maintaining and improving the habitats of protected bird species in arable land of ornithological importance, through the transition to organic farming in pastures;

- Measure 39: "Maintenance and improvement of Red-breasted Goose habitats in arable lands in Natura 2000" - the measure is aimed at maintaining and improving Red-breasted Goose habitats in arable lands of ornithological importance, by sowing and growing at least 50% of autumn cereals and at least 30% of maize of the declared area in the species' habitats;
- Measure 40: "Maintenance and improvement of green infrastructure elements in the habitats of protected bird species in arable land" - the measure is aimed at providing suitable nesting and feeding places for bird species in arable land by maintaining and improving the ecological infrastructure;
- Measure 41: "Maintaining and improving the habitats of protected bird species in arable land by diversifying the crops grown" - the measure is aimed at maintaining and improving the habitats of protected bird species in arable land by diversifying the crops grown and includes increasing the number of crops grown on the farm, which increases the diversity of the birds' food base and leads to the creation of diverse habitats suitable for different bird species (this also includes land left fallow, grass and grass fodder), as well as not carrying out soil tillage in the period from harvest to September 30.
- Measure 44: "Improving the condition of species habitats through the implementation and transition to organic farming" - the measure is aimed at maintaining and improving the habitats of protected bird species in arable lands of ornithological importance, through the transition to organic farming in arable lands.

The above measures are reflected in the "Strategic Plan for the Development of Agriculture and Rural Areas of the Republic of Bulgaria for the period 2023-2027 (https://www.mzh.government.bg/media/filer_public/2023/01/10/strategicheski_plan_2023-2027_8LjLWGr.pdf). In campaign 2023, according to the Strategic Plan, new interventions for rural development are launched, which provide for "Maintaining the habitats of the Red-breasted Goose (*Branta ruficollis*), Eastern imperial eagle (*Aquila heliaca*) and Egyptian Vulture (*Neophron percnopterus*) in ornithologically important sites in arable land" with a duration of the commitment of 5 years.

III. Conclusion

In the light of the information presented, we consider that Bulgarian government has fulfilled its obligations under points 1, 2, 4, 6 and 7 of Recommendation 200 (2018) of the Bern Convention and continues to implement the remaining commitments that require prolonged actions.

Bulgaria continuously make efforts for improvements in order to meet the objectives of the Bern Convention and to implement mitigation and other measures in order to protect birds and their habitats.