



Strasbourg, 16 February 2024

T-PVS/Files(2024)29

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Bureau of the Standing Committee**

18-19 March 2024  
Strasbourg

**Complaint on stand-by: 2021/2**

**Alleged threat to birds and protected sites due to the  
proposed construction of windfarms (Norway)**

**- COMPLAINANT REPORT -**

*Document prepared by  
BirdLife Norway*

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**Subject: Complaint No. 2021/2: Complaint on stand by: Norway: Alleged threat to birds and protected sites due to proposed construction of windfarms and particularly Haram Wind Power Plant. Report from BirdLife Norway 2024.**

Following up the invitation from the Bureau of the Bern Convention dated 7<sup>th</sup> October 2022 to the Norwegian Environment Agency, Att. Senior Advisor Mr. Andreas Benjamin Schei to send a progress report including requested information and any other relevant updates no later than 31<sup>st</sup> January 2024, addressed at the meeting of the Bureau on Spring 2024, BirdLife Norway as the complainant is hereby sending its updated report.

### **Haram Wind Power Plant**

Contrary to the confirmed statements of the importance to a wide variety of breeding, migrating, and wintering birds on and around Haramsøy and migrating through the area, a wind power plant on the plateau of the island was finally given licence for building 8 wind turbines, and Haram Wind Power Plant was operating from the end of 2021. A monitoring program on the influence on the bird fauna in the area was started March 2022 focusing on two breeding species of birds of prey, the White-tailed Eagle, and the Peregrine Falcon, one owl species, the Eagle Owl, and one seabird species, the Shag. The program further included searching for bird-strikes at the wind turbines by using dogs. Finally, bird migration is monitored by using bird-sound recorders. The monitoring program is even including bat studies. The bird monitoring is covering a three years' study, and the first-year field report was presented February 2023.

### **Birdlife in the area**

The archipelago around the island Haramsøy was known for its rich coastal ecosystems way back in the past, first mentioned in a description of the coastal region named Sunnmøre given in a book with two volumes in 1762 and 1766. The very rich fisheries along this part of the coast were well known nationwide and to the authorities, at that time located connected to the king of Denmark. The description of a rich and wide variety of fish species giving rise to fisheries and outcome for coastal people, was even the basis for a dense seabird population with large bird-cliffs and seabird colonies on all islands. This was still the situation when the Norwegian Ornithological Society (today's BirdLife Norway) established bird surveys along this part of the coast, later leading to establishing several bird sanctuaries and wetland reserves, some of them finally included into The Emerald Network by the Bern Convention by December 2019.

### **Today's situation concerning birdlife and Haram Wind Power Plant**

The total area of Haramsøy is 13,3 km<sup>2</sup> and the wind power plant is placed on the plateau at the top of northern parts of the island, covering about 1,5 km<sup>2</sup> of the 2,3 km<sup>2</sup> wide plateau originally consisting of blanket bogs, however during the 1970-ies for a larger part cultivated into farmland. Originally this plateau was the stronghold of partly alpine birds like willow grouse, golden plover, dunlin, short-eared owl, cuckoo and Lapland bunting, partly coastal birds, and seabirds like red-throated diver and arctic skua, but even skylark breeding on the drier and more grassland parts of the plateau. By cultivating the blanket bogs, the skylark became obviously more favoured, and so were waders like the common snipe and curlew. For the skylark this plateau has been one of the main areas for this red-listed bird species in this region, where the population has been close to wiped out, obviously due to mechanized and industrialised farming.

For several traditionally breeding bird species on this island, Haram Wind Power Plant by now is making a serious threat for the breeding populations, of which following species have been given priority during a monitoring program running for three years (2022-2024).

### **White-tailed Eagle**

Haramsøy was one of the very few breeding sites where this species survived through the period when it was dramatically declining in Norway, and one of the today's pairs is still nesting in the east side cliffs in the same area where its predecessors have been breeding as long as any residents have known, not only the last decades described in the field report from the monitoring program 2022. The traditional nest is only 270 m away from the nearest wind turbine, and the eagles raised two chick 2022 to fledging stage. In 2023 the nest was lined but without any chicks. About 10 years ago another white-tailed eagle pair established on the opposite side of the island, however, this has apparently disappeared during the last three or four years.

### **Rough-legged Buzzard**

During the 1970-ies this species was nesting in the cliffs on the eastern side of the plateau, and the localised nesting sites is situated about 1 km from the nearest wind turbine.

### **Golden Eagle**

During the period when Norwegian Ornithological Society (now BirdLife Norway) has been monitoring the bird fauna in this region, 1968-2023, the golden eagle has been an occasional winter visitor. However, three years ago, the species was reported to be repeatedly observed partly on Haramsøy, and on the neighbouring Skuløy, even during the breeding season. Two years ago, the species was seen in activity close to a cliff-nest on Skuløy, and in 2023 the golden eagle was successfully breeding and raising one fledgling at this nest. After being fledged the eaglet was seen together with one of its parents at Løvsøy, west of Haramsøy. The species has been thoroughly monitored in the neighbouring coastal region, where it has shown up to have its densest population known in Norway, calculated at 43,6 km<sup>2</sup> pr. territorial pair. It is obvious that a breeding pair on Skuløy depends on a much larger hunting area than that of this single island. The total area of all four islands from Fjørtoft to the north, Skuløy, Haramsøy and Løvsøy to the southwest have a total land area of 48,6 km<sup>2</sup>, and no doubt this golden eagle pair must visit and cross even to Løvsøy (as was confirmed 2023) to hold a suitable breeding territory. Quite clearly this pair will be vulnerable for collision with wind turbines at Haram Wind Power Plant.

### **Peregrine**

Before the 1970-ies the species was only known as a breeding bird at Skuløy in this archipelago, but in the 1970-ies a breeding pair was established on the west side of Haramsøy, with several alternative nesting ledges in the cliffs 170 m off the westmost wind turbine (Turbine 1). This nesting site was annually occupied for the whole period up to 2020, mostly confirmed with successful breeding. 2021 the site was occupied during the start of breeding season. However, the birds disappeared during late spring or early summer, and have not been occupying the site since. In the 1980-ies and later another peregrine pair was breeding further south on the west side of Haramsøy, about 800 m southwest of the nearest wind turbine today (Turbine 8), even this pair annually, and mostly confirmed successful. So was a third pair in the cliffs on the east side of Haramsøy, 300-400 m from the wind turbines on the north-eastern part of the plateau (Turbines 4 and 5). The last three to four years there has not been any indications of occupancies even in this area. The description of the occurrence of peregrine on Haramsøy given in the field report of the monitoring program from Haram Wind Power Plant is not in accordance with the data collected by BirdLife Norway.

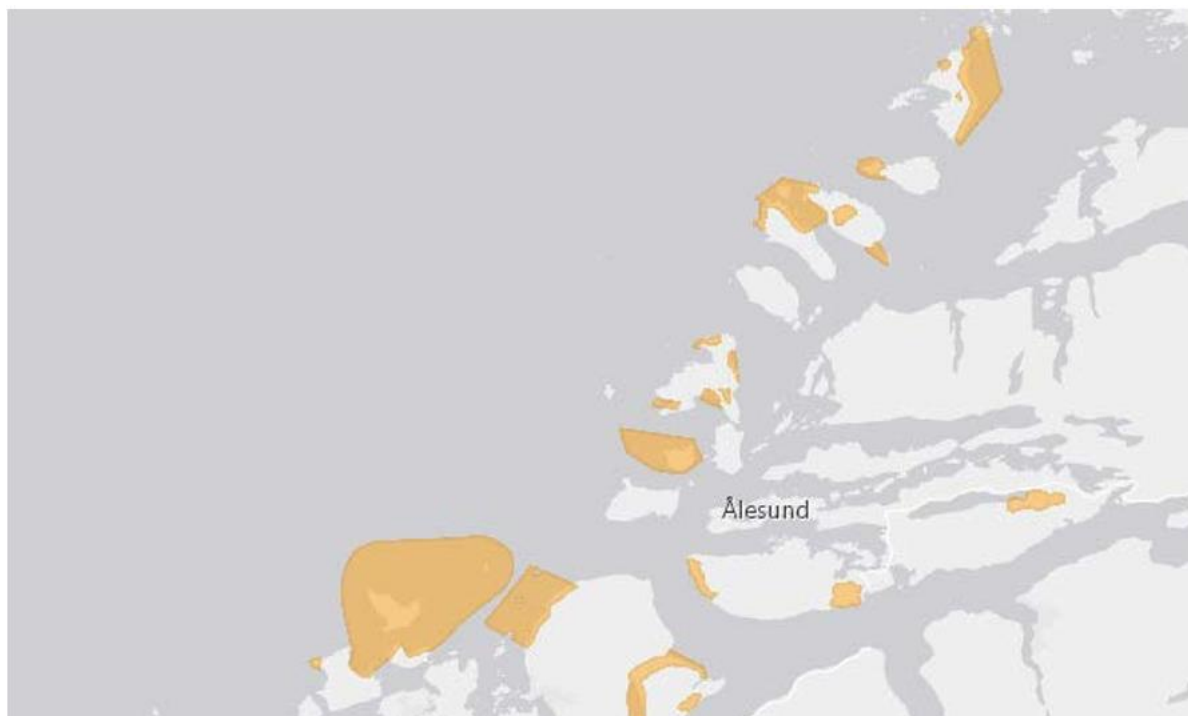
### **Eagle Owl**

When The Norwegian Ornithological Society started its survey on seabirds and other bird species at Haramsøy and the other island close by in 1968, the eagle owl was breeding on all the islands in this archipelago, and the main breeding site on Haramsøy was in the foothills on the west side of the northern part of the island, just below the seabird colonies in the area, about 250 m distance from the westmost wind turbine today (Turbine 1). Rather recently (2008) the species was found breeding at the foothills on the east side of the island. The species has been recorded several times during recent years, both visually and by calls at different sites on Haramsøy. To our opinion there has hardly been any qualified use of sound recorders to exclude the species from the island as a potential breeding bird, as seems to be the conclusion of the filed report of the monitoring program 2023.

### **Shag and other seabird species**

Norwegian Ornithological Society (now BirdLife Norway) made a survey of the seabird colonies and the occurrence of seabirds in general in this region from 1968 onwards. Further on the population of seabird species

and birds of prey has been monitored for periods and has been an important basis for evaluation of nature and to manage species and ecosystems to reach the goals for nature conservancy. During the years, on Haramsøy and the surrounding archipelago there have been established several bird sanctuaries and nature reserves that finally by decision of Standing Committee of the Bern convention 2019 was included into The Emerald Network. An important part of this is concerning seabird and wetland bird protection.



*Fig. 1. Sanctuaries and nature reserves in the coastal region of Sunnmøre including the archipelago surrounding Haramsøy, that is an important part of the Norwegian areas included into The Emerald Network.*

By the late 1960-ies the seabird populations along these coasts were thriving and several species were still increasing in number and distribution, i.e. fulmars, gannets, great skuas and kittiwakes. A fundamental change in basic conditions for marine ecosystems changed this dramatically during the 1970-ties and onwards, and we have witnessed a critical collapse in many seabird species, even loss of some breeding species in this region (fulmar, partly also eider duck and kittiwakes). When the nature reserves were established on Haramsøy and its archipelago, the seabird colonies were healthy and included several species where fulmars and shags were in good numbers, all together 1200-1250 pairs all together in the archipelago by 1970 and 150-200 pairs of fulmars. Even considerably more seagulls of all species, colonies with thousands of pairs both on the skerries, along bird-cliffs, along seashore meadows and on bogs. Mainly and obviously caused by shortage of sea-based food, starting with a collapse of the Atlantic winter-spawning herring along the Norwegian west coast from about 1970, the food shortage has been a repeating problem most of the years since then. After a period of 40 years seabirds in general have suffered and the population has been brought to what seems to be historically low levels. This has built up serious challenges for seabird management. That is why most of the seabird sanctuaries in Norway today is holding only traces of former overwhelming numbers of breeding birds in their bird-cliffs and seabird colonies. Some tiny indications during the very last years may hopefully be slight indications of a positive change in the years to come and underlining the need for protecting the still used and functioning bird-cliffs and seabird colonies. This is more critical than ever.

From this point of view the bird sanctuaries and nature reserves on Haramsøy and the surrounding archipelago, Norwegian parts of The Emerald Network, are more important than ever. It is particularly so when facing threats from the windfarm placed literally amidst the protected areas. That is of course why the shag is one of the selected bird species for the three years' monitoring program to record eventually negative effects from the wind power plant.



Fig 2. The Haram Wind Power Plant on the plateau of Haramsøy surrounded by bird sanctuaries and nature reserves (marked with green lines), partly ashore and along cliffs and plateaus, partly including tidal flat and shallow waters.

So far filed reports from the monitoring programme demanded from the Norwegian Energy Authorities is only available from the first of three field seasons, 2021. Here is described the methodology for breeding shag monitoring, and even the results from the surveys and counting of nesting shags in the colony close to the wind power plant. It is impossible to compare field counts based on records from less than 100 m away to those counted more than 200 m and even 1 km away. For a species nesting hidden and underground in crevices, partly single pairs, partly groups from 3-4 to 10 pairs, spread over steep and cliffy areas, it should not be used for statistics. BirdLife Norway has made own records from the shag colony in the same period and has noticed a remarkable low activity in the shag colony from peak of breeding season during June to the end of the season July/August. Correspondingly the number at adult bird on perching sites and at sea in front of the colony has been low compared to the situation before the building of the wind power plant started. The counts of bird resting or active inside or in front of the colony seem to have declined during 2021-2022-2023.

### **Bird strikes in Haram Wind Power Plant**

The monitoring programme naturally includes the effect of the wind power plant by bird strikes (and bat strikes) and is following up by established methodology used in other wind power plant. It is performed by using tracing dog equipages searching for dead or injured birds once every second week, and covering a circle of 100 m around each wind turbine. When farmed area for grass harvesting is included in this circle, however, the searching should not exceed 20 m from the nearest road (for farm-equipment etc.). At the moment there is only available results from the study in 2022. Summarized from 2022, from 12<sup>th</sup> March to 8<sup>th</sup> October there have been 17 searching days and been collected 65 dead birds. All 8 turbines are included, one with only one dead bird, five of them have less than 10 birds, four with 4-5 bird, one with 9 birds, one with eleven, and one with 27 birds. 17 different bird species have fallen victims. 11 of the species are passerines with the twite as the most numerous with 8 specimens, the meadow pipit the next with 5, and the skylark with 4. Two wader species are included, 7 common snipes and 6 golden plovers. Birds of prey are represented by merlin (two specimens), seagulls by herring gull (2) and common gull (1), and even one black grouse/blackcock. However, surprisingly the statistics are including a high number of not identified birds fallen victims, all together 20 specimens. There are no comments on this category, and it is occurring by all turbines except one, dispersed on 13 different dates.

In addition to bird strikes found under routinely searches, the field report comments one ruff found outside the systematized circles, and one golden plover, and one sparrow hawk. Other reports of victims from bird strikes

from the wind power plant is two white-tailed eagles, one juvenile and one immature bird according to photographs. One of the eagles was recorded by one cut-off wing. Several dead birds have been found and taken care of by people hiking in the area, but without being included in the monitoring results.

The searching methodology has been tested by placing dead birds in the terrain to check the effectiveness of the searching dogs. The results indicate that the dogs are detecting 55 % of the carcasses placed in the terrain, and that some carcasses disappear from the terrain at least after a couple of days and indicates that most of the carcasses or remains disappear within 14 days, which is the frequency of the searches. Given this information, a statistician has calculated the supposed total losses of birds during this first year monitoring to be at the size of 400 to 500 bird strikes, if the numbers of killed birds collected methodologically are representative for the frequency of bird strikes in this wind power plant.

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General secretary BirdLife Norway

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The Norwegian Environment Agency  
Ministry of Climate and Environment  
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Links to the two annexes/background material (in Norwegian):

- Report Rambøl 2022: <https://birdlifenorway.egnyte.com/dl/Y2ANxKB88j>
- Report NOF Møre og Romsdal 2003: <https://birdlifenorway.egnyte.com/dl/5jHOAJkUGS>

