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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

41st meeting
Strasbourg, 30 November – 3 December 2020

New complaint: 2021/2

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

- COMPLAINT FORM -

*Document prepared by
Norwegian Ornithological Society & Birdlife Norway*

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM

NB: Complaint forms must be submitted in electronic word format, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis.

Please, fill in this form and send it to the attention of:

Bern Convention Secretariat

Directorate of Democratic Participation
Council of Europe
F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name: Kjetil Aadne

Surname(s): Solbakken

On behalf of (if applicable): Norwegian Ornithological Society (NOF)/Birdlife Norway

E-mail: kjetil@birdlife.no

Web site: www.birdlife.no

Date : 26.01.2021

Electronic Signature

Kjetil Aa. Solbakken

1. Please state the reason of your complaint (refer also the Contracting Party/es involved and the Articles of the Convention which might be violated).

The fact that protected sites must not be damaged by construction of windfarms, particularly in areas that are ranked highly due to their values and function in international conventions such as Ramsar, might seem obvious. Nevertheless, there are several planned windfarms in Norway that give cause for concern. A review of Norwegian Emerald Network sites reveals that some of them are affected by building concessions for windfarms. In fact, many windfarms in Norway given concession (near hundred) is located in important areas for White-tailed Eagles, Eagle Owls, migration routes and so on.

We have previously voiced our concerns to the Ministry of Climate and Environment as well as to the Ministry of Petroleum and Energy, without receiving any clarification as to whether the conservation values of the Emerald Network have been considered, or whether the ministries will choose to continue with the planned/built windfarms. BirdLife Norway are extremely concerned regarding the effects upon the very conservation values upon which these Emerald Sites have been selected, if these windfarms become a reality. BirdLife Norway request that the Bern Convention consider whether these windfarm developments are in harmony with the nation's duties to the convention. BirdLife Norway request that the Bern Convention raise this matter with the Norwegian authorities.

As the Norwegian authorities are now in the final phase of establishing a new system for concessions for land-based windfarms, we request that the Bern Convention ask for a briefing as to how the system is expected to maintain the expectations the convention requires in order to safeguard the environment for plants and animals.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

Havsul 1 in Sandøy and Aura, Møre og Romsdal county, will affect Runde (Ramsar site no. 2164), as it will occupy a central foraging area for seabirds from this colony, and which is the most important foraging area for seaducks and seabirds outside the breeding season, particularly for those from Harøya Wetland System (Ramsar Site 806).

Haram windfarm, Haram in Møre og Romsdal county is situated along one of Norway's most important migration routes for birds and is surrounded by protected sites. Haram windfarm is surrounded on three of four sides by Emerald Network sites (e.g. Ullasundet).

Species effected includes Puffin, Kittiwake, Gannet, White-tailed Eagle, Songlark, Eagle owl and Shag.

3. What might be the negative effects for the specie/s or habitat/s involved?

The birds will be affected through collisions with wind turbines and loss of habitat due to evasion effects, e.g. important areas for seeking food.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald network site?

Yes, the windfarm Havsul I will affect Ramsar-sites:

Runde, Ramsar site no. 2164

Harøya Wetland System, Ramsar Site 806

5. Do you know if there are any pending procedures at the national or international level regarding the object of your complaint?

The area included in the concession for building Havsul 1 in Sandøy and Aura, Møre og Romsdal county, will affect Runde (Ramsar site no. 2164), as it will occupy a central foraging area for seabirds from this colony, and which is the most important foraging area for seaducks and seabirds outside the breeding season, particularly for those from Harøya Wetland System (Ramsar Site 806). The Ministry of Petroleum and Energy is currently processing a complaint regarding the delayed start for this project, and the outcome is expected to come soon.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc)

Please see our main letter for map and size information.

More information (Norwegian letters):

Letter to The Norwegian Water Resources and Energy Directorate, Ministry of Petroleum and Energy and Ministry of Climate and the Environment about Emerald Network-sites effected by windfarms: https://www.birdlife.no/innhold/bilder/2020/01/10/6591/emerald_network.pdf

Letter to Ministry of Petroleum and Energy about sites and birds effected by Haram windfarm: https://www.birdlife.no/innhold/bilder/2020/08/18/7419/notat_haram_2020.pdf

Complain to The Norwegian Water Resources and Energy Directorate about Haram Windfarm from 2019:

https://www.birdlife.no/innhold/bilder/2019/09/24/6353/haram_vindkraftverk.pdf

Letter to Ministry of Petroleum and Energy about Havsul I:

https://www.birdlife.no/innhold/bilder/2020/11/19/7677/nof_notat_havsul.pdf