



# Windfarms in Balchik and Kaliakra – Via Pontica (Bulgaria)

Case file update 2018

Irina Mateeva

Bulgarian Society for the Protection of Birds



Bulgarian Society for  
the Protection of Birds



**PARTNER**

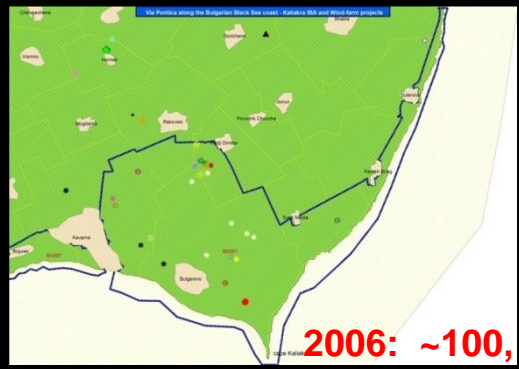
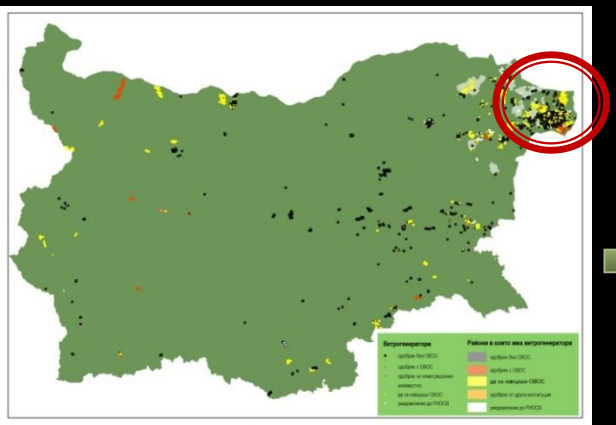
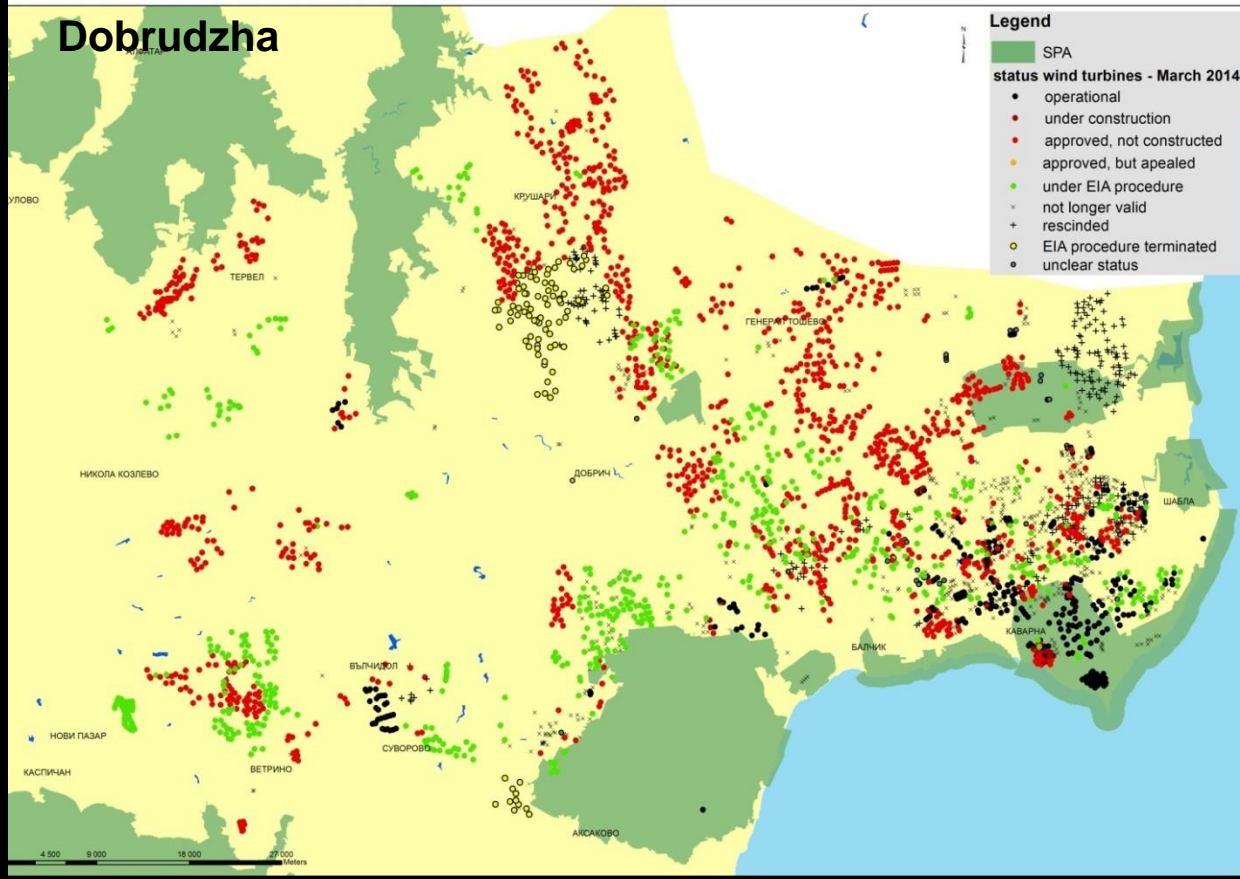
# Dobrudzha

**Legend**

SPA

status wind turbines - March 2014

- operational
- under construction
- approved, not constructed
- approved, but appealed
- under EIA procedure
- not longer valid
- rescinded
- EIA procedure terminated
- unclear status



**2006: ~100,**

**of which 10 operational**

**Rec. 130(2007) of BERN Convention**

**2016: European Court of Justice Ruling on case C-141/14 Kaliakra**

**In Dobrudzha today (2018):**

- **Operational – 330, including in Kaliakra IBA/SPA**
- **Approved – 1329**
- **Under procedure – 599**
- **Temporary stopped by MoEW – 235**
- **No longer valid – 626**
- **Unclear status – 31**

**2018: new recommendation of BERN Convention**

# Draft recommendation Bern 2018

1. The **comprehensive independent assessment** of the impact of operational windfarms in the Kaliakra area ...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.

- ✓ fully necessary and acceptable in the way it is formulated and clearly delineated by time deadlines

SEA report 2010:

- ✓ “comprehensive”, “independent”, addressed also all types of impacts and it was accurate for the time it was made
- ✓ very correctly predicted the expected impacts of the windfarms located in Kaliakra IBA
- ✓ expert opinion in the SEA was that the windfarms located in the Kaliakra IBA should be removed
- ✓ the procedure for development of the SEA, there are no possibilities for the “scientifically appropriate methods” to be “agreed in advance”

- ✓ additional assessment and analysis of the projects that are the subject of the ECJ Ruling on Kaliakra case – not public

- ✓ new SEA for the new NAPRES which will be implemented after 2020 – promise without guarantee for “comprehensive”, “independent” assessment, “also address other impacts”

# Draft recommendation Bern 2018

## 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*;;
- ▶ includes observations at *both windfarm sites and comparable areas* with no windfarm developments;
- ▶ is coordinated across all the Kaliakra installations;
- ▶ is undertaken in conjunction with research by NGOs, supported by *data-sharing agreements*;
- ▶ undertake related research where it would be appropriate and cost-effective to associate this with the field efforts already being made;
- ▶ makes information about the methods and systems used *available in a form which would allow these to be replicated*
- ▶ *feeds results and insights into national processes for planning and assessment*

- ✓ fully necessary and acceptable in the way it is formulated and clearly delineated by time deadlines
- ✓ very important for the Government to comply with the European Court of Justice ruling C-141/14

### Early Warning System (EWS):

- ✓ tackles only one of the impacts which the operational wind farms cause – collision
- ✓ EWS started to operate in April 2018 , thus it is too early to conclude about its efficiency
- ✓ very late for this system to be subject to open discussions and improvements
- ✓ actions were not taken so far to address the other types of impacts

- ✓ integrated management plan – blocked



# Draft recommendation Bern 2018

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 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.

4. The conservation impact achieved by measures undertaken in response to point (iii) 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.**

- ✓ well formulated in terms to provide further possibilities to “explore options” to mitigate and compensate impacts of the operational wind farms
- ✓ wind turbines in Kaliakra IBA cause unacceptable impact and damages on migratory birds and their habitats and thus should be removed without delay
- ✓ measures that are over and above what the authorities and landowners should be doing anyway to maintain the conservation objectives of the sites
- ✓ Bulgarian Government states they have already made all the efforts which could be identified in relation to this proposed measure
- ✓ measure 3 is still valid and correct to implement.

- ✓ fully necessary and acceptable in the way it is formulated



# Draft recommendation Bern 2018

5. *The successor plan to the Bulgarian National Renewable Energy Action Plan 2011–2020 should **re-confirm the latter's prohibition on wind energy developments in sensitive locations.***

- ✓ this measure is absolutely necessary in the new recommendation
- ✓ The Sensitivity map for wild birds due wind farm development, clearly showed that there are enough areas out of the high-risk zones for wind energy production

6. *The Bulgarian authorities should provide 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 in Bulgaria meet each of the individual points in paragraphs 1, 4, 8 and 9 of Recommendation No. 130 (2007)***

- ✓ We suggest that this measure to stay in the new Recommendation and to give the possibility for the Government to make a more precise overview and preferably to ensure broader expert discussion of this report at national level, prior to submission to the Bern Convention

7. *The Bulgarian authorities should **promote the dissemination and use within the country of the guidance on windfarms and birds developed under the auspices of the Bern Convention.***

- ✓ fully necessary and acceptable in the way it is formulated
- ✓ the Government's report confirms that efforts so far are not sufficient in terms of communication and promotion of the guidelines of the Bern Convention



# Draft recommendation Bern 2018

8. Options should be explored for developing a proposal for a project to **build enhanced capacity** in Bulgaria on knowledge exchange and best practices in the **assessment and management of wind energy impacts on wildlife**.

Points 8, 9 and 10 - fully necessary and acceptable in the way it is formulated

9. The **Conservation Action Plan for the Red Breasted Goose** population in Bulgaria should be funded and implemented without delay... Those responsible for the Plan should ensure that thorough and coordinated monitoring of the species' population status and trends receives sustained high priority attention.

10. The findings of the **on-the-spot appraisal should be shared** with the Secretariats of the AEWA and Eurobats Agreements, the Convention on Migratory Species and the European Commission, given that all of these bodies have shared interests in the issues it covers..



# Suggestions to Bern Convention

The draft recommendation, elaborated by the Bern Convention Secretariat to be adopted by the Contracting Parties as it is proposed

*In order to ensure that sufficient measures are undertaken without delay, according to scientifically appropriate methods, agreed in advance, as well as the processes and results are transparent and shared based on collaboration*

