

Lessons Learned – advocacy against planned wind farms with potentially negative impacts on pelicans

The challenge

Against the backdrop of an increasingly visible global climate crisis, at European level the Green Deal announced in late 2019 signalled a new impetus for RES development in the European Union. International debate and the EU Green Deal also highlighted the biodiversity loss crisis as an equal and interrelated priority to climate change and many guidelines and tools were developed to reconcile the rapid development of RES projects with biodiversity conservation (by the IUCN and other international actors).

Wind farm development in Greece in the past 20 years has gone through cycles of slow activity and surges of hyperactivity. Throughout this period national, regional and local spatial planning regulation in the country has been weak, if it existed at all, and has often led to conflicts regarding the siting of wind farms and their environmental impacts, usually focusing on the killings of wild birds. In 2020 swift changes in national legislation were introduced in Greece in order to expedite and facilitate the administrative procedure of licensing RES projects and achieve the targets of related national strategies and policies for moving from the use of fossil fuels to an energy production based on renewables. This legislation related mainly to the environmental permits of RES projects, and especially wind farms, (a) increasing the size of projects that could be subject to a very simple procedure of standard environmental terms without effectively passing through a proper environmental impact assessment, (b) shortening the timeframes in which the Administration should respond to applications for permits and (c) considerably simplifying the first stage of licensing, the so-called “producer certificate”.

This new institutional framework quickly led to a revival of old wind farm projects, with a notable trend of amending these permits reducing the size of the project, a phenomenon instigated mainly by the simplified requirements related to the price of the unit of energy produced by a wind farm in force for wind farms under 3MW of produced power. To the surge of amended environmental permits a wave of new applications was added for many small and large projects that throughout 2020 seemed to blanket cover the entire mountain territory of the country and in parallel intercepting the migration routes of pelicans between important wetlands in northern Greece. A phenomenon of fragmentation was also discerned, according to which instead of a large wind farm the same investor is permitted to design many small contiguous ones, which are subject to the favourable pricing rules and to the nominal environmental licensing requirements.

Only protected areas in their strictly defined perimeter were spared by this change, as projects planned therein still require a Special Ecological Assessment to be carried out, subject to public consultation, before their environmental permit is considered. Throughout the country, this situation caused a widespread reaction with groups of local inhabitants, small or bigger civil-society organisations and local authorities reacting to wind farm plans by activism on the ground and by using the means of legal redress available to them. The overall change of land use and fragmentation of natural ecosystems has been brought to the limelight in this period as a major negative impact from these installations, along with bird killings.

The year 2020 also witnessed an especially sad event for Prespa, the killing of 3 great white pelicans at the wind farm on Mount Varnous in early August. After a long and hard legal battle against this project by the SPP, the construction was forced to be restricted and equipped – at least in theory – with bird detection cameras. After the killing incident, the SPP instigated an environmental audit procedure to investigate compliance with its set environmental terms, which resulted in a fine imposed on the company on the grounds that its bird detection system had not been operational for many years. However, bird detection cameras with prevention systems have not proven effective in stopping killings, with a further incident on the same farm involving dead pelicans having been recorded in August 2022, despite the full operation of the detection system. At the same time, it appears that the post-construction monitoring methods defined in the environmental licensing procedure are inadequate and cannot document the presence of pelicans, nor deaths of travelling birds for that matter.

As an environmental NGO, the SPP acknowledges the global problem of the climate crisis and is in principle in favour of the development of renewable energy sources, under the strict requirement that relevant projects are subject to national and EU legal rules in order to identify, prevent and minimize possible adverse environmental impacts and especially such impacts on biodiversity. In addition, the SPP did not have the resources to follow and intervene in all cases of planned wind farms in northern Greece that might create environmental concerns and therefore had to establish a method for selecting the wind park installations on which to act, on the basis of the most likely effects on pelicans during their long-distance movements.

The solution

Since 2020, the SPP has had to reorganize its work and define its approach, in order, firstly, to follow these rapid developments, secondly, to assess the risk new wind farm projects pose to the protected values of Prespa, and especially the pelicans in their long-distance movements, and, thirdly, respond effectively to projects of priority concern. The SPP decided to work at multiple levels to achieve these goals and prevent the development of RES in areas that may pose a threat to migrating pelicans.

The following steps were undertaken to support decision-making and define the course of action:

- **Organization of the monitoring methods of wind farm applications**, changes in technical specifications of wind farms (e.g. changes in size, type or placement of wind turbines), licencing procedures and responses of local stakeholders and authorities.

The SPP had to re-organize its threat monitoring work and add on websites related to wind park installations and licensing procedures. This inclusion of regular frequent searches has allowed the identification of the magnitude of the issues of new and rapid wind farm development since 2020, and enabled the SPP to set the next steps, such as approaching authorities with proposals for appropriate site selection, and to set criteria for identifying the subsequent proposed installations that entailed threats across the range of pelican movements in northern Greece and would require the organisation's attention and intervention.

- **Organization of data and analysis of long-term datasets** on Dalmatian pelican migration routes and other highly important movements between wetlands of northern Greece during the breeding season.

This step was considered absolutely essential, as it would (a) support the SPP's policy work against the development of wind farms with expected negative effects to protected values, (b) allow the formulation of arguments against poorly developed Environmental Impact Assessments (EIAs) and (c) further support land-use planning efforts and protected area management proposals that were imminent and currently ongoing, such as the Special Environmental Study (SES) and the Management Plan of the Prespa National Park and the Protected Areas of Western Macedonia, as well as the revision of the National Spatial Plan for RES.

- **Addressing the lack of adequate spatial planning and appropriate impact assessment for wind park installations at multiple levels**

According to the results of the previous two steps, i.e., the analysis of data and the monitoring of new wind farm applications, the SPP has pursued three courses of advocacy action: (a) developing and promoting proposals for appropriate spatial planning of wind farms to the relevant authorities, (b) proposing the addition of Special Ecological Assessments, and particularly of ornithological studies, within the environmental licensing procedure of wind farm installations, even outside the protected area networks, where pelican movements are impaired and (c) intervening in the public consultation processes for wind farms that have poor EIAs and inadequate proposals for the reduction of negative effects.

Lessons learned

- Firstly, and most importantly, it has been crucial for the SPP to define criteria and delineate its course of action, and in essence create a process for deciding whether it will be involved in assessing and/ or acting against specific projects. While the inclusion of new proposed installations has continued increasingly since 2020, this decision process and the set criteria have been key to saving efforts and resources.
- Nonetheless, it is crucial to understand that each proposed wind farm is different and requires separate assessment and a different approach to counteract its possible negative effects on habitats, ecosystems, and

species. Although setting criteria and selecting interventions accordingly saves time, the amount of work (mainly time) needed to counteract individual proposed installations remains high.

- Negative effects, especially for long-distance, frequently travelling species like pelicans, can be cumulative, and therefore each wind farm under development should be assessed along with others in its vicinity and along pelican movement routes.
- Meticulous monitoring of “producer certificates” and new proposed projects is very important, in order to identify any action to be taken in time, as deadlines are very tight. It is also very important to regularly follow developments in projects for which the SPP has already intervened and extract information on the outcomes of interventions.
- Acting proactively to support the decision-making and putting together a memorandum with concrete proposals for wind park development along the main travelling routes of pelicans between important wetlands of northern Greece was key. The memorandum’s proposals have been taken on by the Regional Administration of Western Macedonia, which now routinely requests Special Ecological Assessments (SEAs) and ornithological studies, even for projects situated outside the limits of protected areas.
- Changes in planning could potentially reduce the negative effects of wind park installations, but the regional administration often lacks the resources, expertise and appropriate tools to counteract and propose alternatives to proposed planning. The SPP’s interventions may prove crucial in ensuring that appropriate measures are included in licensing and are subsequently implemented.
- The SPP’s interventions at all levels and its insistence on using scientifically sound arguments, have brought about positive developments and affected processes so far in multiple ways, such as (a) several proposed projects have opted for carrying out Special Ecological Assessments, regardless of not being obliged to due to their position outside protected areas, (b) an increasing number of wind farm projects, along the pelican flyway, are opting for installing movement detection and collision prevention systems or even for removal or for position changes of specific wind turbines to avoid collision risks, (c) regional authorities are requesting additional mitigation measures, based on SPP proposals and (d) environmental permits for a few proposed installations have been declined.
- Similarly, the SPP considers it important to be proactive in addressing wider spatial planning issues and in this direction it has seized the opportunity to analyse its data further and propose “exclusion zones for the placement of wind farms” in areas/ sites that act as hotspots for pelican presence. These proposals have been submitted to the ministry of environment and the expert team that is carrying out the Revision of the National Spatial Plan for RES for consideration. More importantly, this concrete and scientifically sound proposal has already been incorporated within the draft Special Environmental Study of the Prespa National Park and Protected Areas of Western Macedonia, while following a relevant request, it was forwarded to the EC, to support the development of a mapping tool for [Go-to areas for wind and solar](#).
- Interventions based on scientific documentation and the analysis of long-term data entail a higher chance of affecting the environmental licensing procedure and also stand a chance of positively affecting the environmental permits, even outside protected areas.
- Finally, it has also proven beneficial to co-operate with other NGOs, local stakeholders and local authorities and exchange information regarding the environmental concerns that are raised within the areas of wind park development. More often than not, additional information about important biodiversity (e.g., large mammals) or ecosystems and habitat types can help build stronger arguments against the development of wind parks in sensitive areas for the entities that decide to participate in the public consultation process.

Related documents

Alexandrou, O., Catsadorakis, G., Malakou, M., Papanousi, F. & V. Roumeliotou. 2021. Spatial planning of multiple windparks along migration routes and other highly important movements of pelican in Western and Central Macedonia, Greece. Society for the Protection of Prespa, Agios Germanos (memorandum, in Greek)

Papanousi, F., Alexandrou, O. & G. Catsadorakis. 2022. Proposal for exclusion zones for the placement of wind farms and isolated wind turbines, based on flight frequency of Dalmatian pelicans *Pelecanus crispus* in Western and Central Macedonia, Greece. Society for the Protection of Prespa, Agios Germanos (proposal report, in Greek)