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TO:

Ministry of Environment and Energy. Directorate for the Environmental
Licensing

N.E.C.C.A. Management Unit of Evros Delta and Dadia National Parks
Region of Eastern Macedonia & Thrace. Committee for the Agricultural
Economy and the Environment

Region of Eastern Macedonia & Thrace. Department of Environment &
Hydro-economy of the Evros Regional Unit

COPY

Ministry of Environment and Water in Bulgaria

DG Environment European Commission

Subject: Wind Power Station “MAVRI PETRA” (“MAYPH ПЕТРА”), 45 MW, Municipality of
Orestiada, Regional Unit of Evros (PIET: 2211854811)

DEAR SIR/MADAM,

Herewith, we, the Bulgarian Society for the Protection of Birds, **object against** Wind Power Station
“MAVRI PETRA” (“MAYPH ПЕТРА”), 45 MW, Municipality of Orestiada, Regional Unit of Evros
(PIET: 2211854811) planned for construction at the Greek-Bulgarian border.

After getting acknowledged with the investment plan, its location, and dimensions, and after referring
to all the data we have and have obtained for more than 30 years of work in this area, and to the best
of our knowledge and expertise, **we wish to express our deepest concerns and drawbacks and to**
object against the implementation of this project, based on:

1. The regulations posed by the DIRECTIVE 2011/92/EU OF THE EUROPEAN
PARLIAMENT AND OF THE COUNCIL on the assessment of the effects of certain public

and private projects on the environment, Article 7, Paragraph 1a, “the Member State in whose territory the project is intended shall send a description of the project, together with any available information on its possible transboundary impact” and “paragraph 4.: The Member States concerned shall enter into consultations regarding, inter alia, the potential transboundary effects of the project.”

2. Our NGO registration as society working for public benefit, expertise, knowledge and power by the Bulgarian law, and thus we appear as an interested party in the process.
3. According to the data at our disposal, we consider that the above-mentioned project is likely to create unacceptable high risk, taking into account also the cumulative effect, to populations of bird species highly vulnerable to wind farms – vultures, including the globally endangered Egyptian Vulture, as well as affecting other species highly sensitive to wind farms and habitat alterations;
4. Bulgarian Zonation Map for Minimizing Risks for Birds due to Windfarm Development, published by the Bulgarian Ministry of Environment and Water¹, according to which the entire territory of Eastern Rhodopes, including the area bordering the above-mentioned project proposal, because of especially high risk for vultures.
5. Requirements posed by the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), Article 2 and 3², having in mind that major wind farm projects are subject of Appendix 1 of the Convention, that the above-mentioned project is classified as such major installation and that at present the Article 2 and 3 of the Convention are not fulfilled by Greece according to our information.
6. The clear requirements in strategic political documents as the European Green Deal where the renewable energy development must be developed only based on “No harm to nature” principle.

In relation to the aforementioned unacceptable risk for threatened bird species, please consider the following, namely:

- I. The area where the wind farm has been planned is part of the breeding territories of an Egyptian vulture and a Golden Eagle breeding pairs, located on the Bulgarian side of the

¹ http://natura2000.moew.government.bg/PublicDownloads/Auto/OtherDoc/276299/276299_Birds_120.pdf (in Bulgarian)

² <https://unece.org/environment-policy/environmental-assessment/text-convention#appendix1>

border (**their nests are only five and two km away from the planned turbines respectively**). In the Greek part of the Eastern Rhodopes, the mortality of Griffons, Cinereous vultures and other species of birds of prey due to operational wind generators has already been documented (Vasilakis et al. 2011). The vultures breeding in Bulgaria and Greece are one biogeographical population and the birds constantly cross the Bulgarian-Greek border flying between both countries (Arkumarev et al. 2021, *Ornis Hungarica*) and thus are exposed to constant high risk of collision with windfarm installations.

- **The Egyptian Vulture** is a globally threatened species and the Eastern Rhodope Mountains hold 50% of its Balkan population (Veleviski et al. 2014, Bird conservation international). More precisely, collisions with energy infrastructure are listed as a major threat to the species in Bulgaria and Greece (Opiel et al. 2021, Biological conservation). Recently, a scientific study, found that further improvements in survival in the wild are required to safeguard the species and an Egyptian Vulture Reinforcement Programme was developed and is under implementation in the Eastern Rhodopes which aims to revert the negative population trend of the species (Opiel et al. 2021, Journal of applied ecology; Arkumarev et al. 2022). Because of its high vulnerability to operational wind farm installations (Carette et al. 2009; Atienza, J.C et. al. 2008; etc.), the Bulgarian Zonation Map for Minimizing Risks for Birds due to Windfarm Development, defines 15 km - safety zone around nests and regular foraging/roosting areas of Egyptian Vultures, where wind farm development is not acceptable even with mitigation measures applied; the above mentioned wind farm project proposal lies within the safety zone of at least one breeding pair of the Egyptian Vulture in Bulgaria, because is located next to the state border.
- The core area of the breeding Egyptian Vulture pairs in the Eastern Rhodopes equals 17,88 km² (Dobrev 2018, PhD thesis, Plovdiv university) and consequently the territory of one pair from the Bulgarian side of the mountain overlaps with the wind farm exploitation area.
- Over the course of the past 7 years (2016 - 2022) 28 captive-bred and 4 wild Egyptian Vultures were released in Bulgaria in the frame of the Egyptian vulture Reinforcement program (Arkumarev et al. 2022) at app. 17-35 km from the planned wind farm. However, immature birds fly large distances in search of food and acclimatization to the area and their home range size can vary from 4238 to 7323 km² (McGrady et al. 2018, Bird study) that inevitably leads to the risk of collisions with the wind farm generators.

- Thereby, the long-term conservation efforts for the species in the region have been summarized and evaluated and the needed actions for the conservation of the Egyptian vulture have been legally authorised and endorsed by the relevant authorities in Bulgaria. On 9/1/2023 the National Species Action Plan for the Egyptian Vulture has been endorsed by the Bulgarian Ministry of Environment and Waters (Nikolov et al. 2022). According to this plan, the building of wind farms at a radius of less than 5 km from Egyptian vulture nests is prohibited whereas the Plan foresees a reduction of up to 80% of collisions with energy infrastructures to decrease vulture mortalities.
- Moreover, the collision with wind farms has been identified as an important threat by the Flyway Action Plan for the Conservation of the Balkan and Central Asian Populations of the Egyptian Vulture (EVFAP) (Nikolov et al. 2016).

II. **The Golden Eagle** is a vulnerable species in Bulgaria (Petrov et al. 2011, Bulgarian Red Data Book) It is listed in Annex I of Birds Directive, as well as it is included in the appendix to Resolution No. 6 (1998) of the Standing Committee of the Bern Convention and is therefore a protected species in Bulgaria. The Golden Eagle is a holarctic species and is one of the largest eagle species in Europe, Bulgaria and Greece and breeds in mountainous regions. It has the role of apex predator in different ecosystems (Watson 2010). Golden Eagles are residents of the Eastern Rhodopes and hunt in open or semi-open areas. **The nest** of the pair on the Bulgarian side of the Mountain is app. **2 km away** from the planned wind farm and thereby the risk of collision is extreme, considering the hunting techniques of the species (Brown 1976, Katzner et al. 2015, Journal of The Royal Society Interface).

- Golden Eagles normally avoid developed areas of any type from urban to agricultural and are very sensitive to human presence (Watson 2010). It is defined as one of the species with high vulnerability to colliding with windfarms across its range (Atienza, J.C et al.. 2008; Ministerium für Umwelt, Gesundheit und Verbraucherschutz des Landes Brandenburg. 2003). Thus, based on studies in different countries, the Bulgarian Zonation Map for Minimizing Risks for Birds due to Windfarm Development, defines 6 km -safety zone around nests of Golden Eagle, where wind farm development is not acceptable even with mitigation measures applied. Due to the close vicinity of the proposed wind farm to the breeding locality of the Golden Eagle (only 2 km) the wind farm itself will likely lead to the abandonment of the territory and/or mortality of eagles. Golden Eagles maintain home ranges or territories that may be as large as 200 km² (McGrady 1997) and therefore the

planned wind farm will entirely coincide with the core of the Golden eagle pair territory which will inevitably lead to an extreme collision risk and the death of the breeders.

III. **Griffon Vulture and the Cinereous Vulture colonies.** The Griffon Vulture and the Cinereous Vulture are known due to numerous studies as the most vulnerable bird species to windfarms. Thus, based on studies in different countries (Atienza, J.C et. al. 2008; etc.), the Bulgarian Zonation Map for Minimizing Risks for Birds due to Windfarm Development, defines 50 km -safety zone around Griffon Vulture Colonies and Cinereous Vultures nests, where wind farm development is not acceptable even with mitigation measures applied. This was the reason entire Eastern Rhodopes (Bulgarian part) to be defined as “No go” areas for windfarms development. It should be noted that because of the Bulgarian Griffon Vulture colony is located along the Arda River in Eastern Rhodopes, the defined 50km- safety zone overlaps with Greek territory as well. Nevertheless that Bulgarian zoning maps applies on Bulgarian territory, construction of wind farms just on the state border on Greek side is highly unacceptable.

Our conclusion is that the wind farm will cause significant impacts on the Bulgarian side of the border and will potentially leave to either abandonment of the territories and/or mortality of the breeding birds of threatened and protected species. Moreover, the investment plan is located at a distance of 2 km from the nest of the Golden Eagle and 5 km from the nest of an Egyptian Vulture. Considering species biology and ecology, the territories deemed for wind farm construction, are within the core breeding territories of both species and **thus we oppose the construction of the wind park.**

This cross-border area between Bulgaria and Greece is one of the few left where breeding and foraging habitat for these and several other raptors is still continuous. Considering the fact that the southern edge of the Bulgarian-Greek border in the Eastern Rhodopes is largely covered by wind farms that obscure the flight corridors of vulture species and also the high number of wind turbines there posing significant cumulative impact, **it is exclusively unacceptable** to cover and obscure one of the last free-open area for birds in this region. This investment must foresee the cumulative effect of all wind farms that have been already built and consider their impact in general. Because of this fact, this area presents high cross-border importance for raptor species and building wind turbines there will imbalance and destroy the last natural and clear of infrastructure birds' flight corridors.

Last but not least, between 2011 and 2022, two major conservation EC LIFE projects have been conducted in this region, regarding the conservation of the Egyptian vulture which is a globally

threatened species. The first project “The return of the Neophron” (2011-2016) aimed at preventing the extinction of the Egyptian vulture in Bulgaria and Greece by addressing the major threats for the species in the trans-border area between the two countries and invested 2,625,742 € in numerous research and conservation activities. After the great success of this project, the LIFE program of the European Commission approved and supported another project to continue the fight for the conservation of this globally threatened species between 2017-2022 (Egyptian Vulture New LIFE Project). This project was even more ambitious (implemented in 14 countries from 3 continents, involving 22 partners!) and aimed to reinforce the easternmost European Egyptian Vulture population by delivering urgent conservation measures to address major known threats at breeding grounds and also along the flyway. The project has just finished and invested 5,848,458 € for the conservation of the Egyptian vulture. We, therefore, are confident that no European government and authority shall allow an investment that will ruin 10 years of conservation activities and millions of euros paid by European citizens to serve private and not public interests.

Finally, we urge the Ministry of Environment and Energy of Greece to terminate this wind farm project and thus secure the survival of the Egyptian Vulture and the Golden Eagle inhabiting this territory and thereby implement and fulfil its obligations according to the relevant European legislation.

Sincerely Yours,

Vanya Ratarova

Executive Director of the Bulgarian Society for the Protection of Birds