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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

30th meeting
Strasbourg, 6-9 December 2010

Complaint in stand-by

**Wind farm threat to wildlife in Alta Maremma, Grosseto
(Italy)**

REPORT BY THE NGO

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2nd February, 2010

WINDFARM THREAT TO WILDLIFE, ALTA MAREMMA, GROSSETO, ITALY

Many thanks for your letter of 14th December 2009, in which you asked for more specific information regarding the status of the proposed wind farm for Roccalbegna, and the population data for the species at risk.

The status of the Roccalbegna project is as follows: A proposal to site 6 x 2mW mega wind turbines (Vestas V90) on the crest of a hill in the comune of Roccalbegna **has been presented to the Ufficio VIA** (Office of Evaluation of Environmental Impact) in Florence. Local residents and other interested parties were invited to make their observations, which had to be presented to the Ufficio VIA by 23rd January, and we – as Comitato Civico per Roccalbegna, under the umbrella of conservation charities CNP and Italia Nostra (of which we are also members), presented a substantial dossier on 21st January containing, as well as our own observations, reports made by a number of experts in various relevant fields (wildlife, noise pollution, geology, law). At this point the Ufficio VIA will start their deliberations and we wait to hear the result. Not much information is forthcoming from official channels, but we hear rumours that this installation is certain to be given the go-ahead.

The location of **both** the existing wind farm of Poggi Alti, Scansano, and one planned for Roccalbegna, (variously known as Bellaria, Monte Bello and Castelluccio) is **within an IBA**, (IBA 194, “Valle del Fiume Albegna) on the ridge between the ZPS of the Albegna Valley and the SIR of the Trasubbie and Trasubbino valleys. The turbines have masts of 80m. in height and blade span of 90m. and are to be sited less than 3km from the existing (still technically illegal) 10 turbines of Poggi Alti. One of the proposed turbines would be a mere 700 metres from the SIR of the Trasubbie valley.

We studied the project presented by ENEL Green Power in some depth, and found, somewhat to our amazement, that it was largely based on data that was distorted, misleading or downright false. In their presentation to the Ufficio VIA, they make absolutely no mention of the existing 10 turbines of Poggi Alti, thereby disguising the cumulative impact, nor in their bird report do they mention, for example, the Lanner but indicate the presence of buzzards. To demonstrate some of these deceptions we have obtained reports from local and national ornithologists, the WWF, a respected acoustic engineer, a lawyer and a geologist, each of whom found omissions and distortions in their respective fields. I attach a translation into English of a report by ISPRA, the Italian environmental research institute, as well as the WWF report.

Your second point regards the monitoring of Poggi Alti, Scansano. Some monitoring has been carried out, although none before the turbines were built. During a monitoring period between November 2007 and April 2008 a few cursory visits were made, at two monthly intervals, and unsurprisingly no carcasses were found. It is most important to note that the personnel involved were instructed by ENEL and therefore by no means Super Partes. This unsatisfactory situation is currently being cited in evidence in a civil suit brought about by Iacopo Biondi Santi, the wine maker, against ENEL and the turbines of Poggi Alti.

In all of this it has been rather difficult to get any precise data on the numbers of birds involved, but I have been able to obtain the following estimates:

Riccardo Nardi, director of the WWF reserve at Rocconi which is home to nesting Short Toed Eagles and Lanner, says:

Short Toed Eagle = 6 pairs in the general vicinity, of whom **2** nest in the comune of Roccalbegna

Stone Curlew = 5 colonies consisting of 6 to 8 members, this census was made acoustically

Lanner = 3 or 4 pairs - one pair has disappeared since Poggi Alti started working

Elaphae Quatorlineata ("Cervone" – black rat snake) = **1** every **3 hectares**

Hermann Tortoise = concentrated in the open grasslands in the Trasubbie/Trasubbino areas, hard to say how many but possibly about **100**, though in decline due to recent fires

The figures for the Short Toed Eagle, the Lanner and the Stone Curlew are corroborated by Guido Ceccolini, who carried out the reintroduction of the Red Kite at CERM.

The ISPRA report states clearly their opinion that the turbines should not be built, as this area sustains significant populations of numerous raptors and has been the subject of many conservation and reintroduction projects.

Finally, I would like to make one last point regarding the decision making process for renewable energy in Italy: in practice all the decisions have been delegated to local government, with the Regions deciding what megawattage they want to install and the companies doing deals with local councils based, it seems, largely on financial grounds. The Assessore responsible for "Energy and the Environment" in Tuscany is **Anna Rita Bramerini**. She has decided we need to have 330Mw of wind power at all costs. We already have a large number of geothermic power stations, and the sensible choice for additional renewables would be solar power, as the wind maps of Europe clearly indicate (see <http://www.windatlas.dk/Europe/Index.htm> and the attached pdf "Producibilità Roccalbegna"). However corporate infrastructure and industrial scale development give turbine manufacturers the leading edge. In Italy the high cost of Green Certificates seems to make it worthwhile to build wind farms where there isn't any wind.

I hope I have given you the information you need to make a complaint against Italy. We have so much to lose – and so little to gain from this form of energy.

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**ISPRA**Istituto Superiore per la Protezione
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Prot. n.

/T-B 113 del

Associazione WWF
Provincia di Grosseto
Cittadella dello Studente
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Fax 0564.871139**Re: Evaluation of the impact of a projected wind farm in the comune of Rocalbegna (GR).**

Responsabili dell'istruttoria: Dott. Alessandro Andreotti (tel. 051.6512225, e-mail: alessandro.andreotti@isprambiente.it) e Dott. Piero Genovesi (tel. 06.50074170, e-mail: piero.genovesi@isprambiente.it).

Following a request from this association dated 11th January 2010, (prot. ISPRA No. 117 of 12th January 2010), and having examined the relevant documentation, we make the following statement:

Underlying problems

The site for the proposed turbines falls within IBA 194, "Valle del Fiume Albegna" and is only a few kilometres from the site ZPS/SIC IT51A 0018 "Monte Labbro e l'Alta Valle dell'Albegna". This area has been, and at present still is, the subject of a series of conservation projects financed by the EU via the organization LIFE Natura.

- LIFE99NAT/IT/006229 – "Monte labbro 3 Alta Valle dell'Albegna, protection and management" lasted four years (1999-2003);
- LIFE04NAT/IT/000173 – "Protection of Habitat for the Raptors of Monte Labbro and Alta Valle dell'Albega" lasted four years (2004-2008)
- LIFE08NAT/IT/000332 – "Save the Flyers" – actually in the start-up phase, with an anticipated duration of five years (2010-2014)

In the course of these activities, both completed and projected, much attention has been dedicated to the conservation of birds of prey and of bats. Among the initiatives carried out or planned, particular attention is drawn to (*):

1. The realisation of a project to reintroduce the Red Kite (*Milvus Milvus*)
2. The release of a pair of young Egyptian Vultures (*Neophron Percnopterus*), born in captivity, to study the technical aspects of reintroducing the species, who once nested in the area;
3. The creation and management of feeding areas (*carnai*) for raptors;
4. The maintenance of mountain meadows used as hunting grounds for numerous species of raptor, among whom the Short Toed Eagle (*Circus Gallicus*), the Lanner (*Falco Biarmicus Feldeggii*) and Montagu's Harrier (*Circus Pygarcus*).
5. The creation of new sites ideal for the Lanner to nest and to observe the occupied nests;
6. Making safe electric power lines posing a threat to migratory and stationary birds;
7. The installation of artificial nests for bats and the protection of caves,
8. The realisation of projects for the protection of feeding areas for bats.

(*) For more detail of the work carried out in the completed projects, please refer to <http://www.lifelabbroalbegnait/>

The actions listed 1 to 3 (reintroduction of the Red Kite and activation of “*carnai*”) has lead to a considerable nucleus of raptors in the area, consisting mainly of Red Kites (over 30 individuals winter here); this nucleus is formed partly by birds that have been released, and partly by birds originating in the wild. The red Kites have been joined by other species, among whom the Brown Kite (*Milvus Migrans*) and the Great Spotted Eagle (*Aquila Clanga*): in both cases an individual bird was regularly spotted during the current winter. Also, considering the imminent start of the project LIFE08NAT/IT/00332, we can predict that in the coming years the number of Red Kites present will rise again, in fact within 2015, some 50 more are due to be released.

This significant number of raptors is actually centred around the Centre for Endangered Raptors (Centro Rapaci Minacciati, CERM) in Rocchette di Fazio (GR), around 8Km from the area designated for the wind turbines in question. Considering the range of movement of the various species present, particularly the Red Kite, the CERM raptors habitually move into the area where the turbines are due to be built, risking subsequent collision with the blades. We maintain that the mortality rate arising from the building of the turbines could have a serious negative impact on the reintroduction project under way, to the point of preventing its conclusion.

We would foresee an equally heavy impact on other species subject to protection by LIFE Natura projects, both completed and on-going, in particular on the Short Toed Eagle, Montagu’s Harrier, the Egyptian Vulture, (*Neophron Percnopterus*) (whose reintroduction will carry on over the next few years) and on the Lanner (for an impact on these two species please refer to the considerations reported in the respective plans of action edited by ISPRA on behalf of the Ministry of the Environment and Protection of Sea and Land (“Ministero dell’Ambiente e della Tutela del Territorio e del Mare”). As far as the Lanner is concerned, a nesting site has been identified right in the immediate vicinity of the proposed wind farm construction site.

Furthermore, the area under discussion is subject to an intense flow of migrating birds, among whom are numerous birds of prey; for the relative data on raptors please refer to the investigations carried out in the course of the LIFE projects already concluded (Giovacchini P., 2003 – L’avifauna del Sito di Importanza Comunitaria “Monte Labro e Alta Valle dell’Albegna” (Grosseto, Southern Tuscany). Atti Soc. Tosc. Sc. Nat., 110: 71-82).

The above considerations strongly advise against the building of the turbines.

Examination of the Technical Data provided by the Proponents

In the document “Study of Environmental Impact – Evaluation of Incidence” edited by SCS Ingegneria Srl in October 2009, on behalf of the proponents of the wind farm, one can see an evident contradiction between the data illustrating the environmental and wild-life contexts of the projected site, and the quantification of the impacts on the wild populations of Birds and Mammals. In particular, we make the following criticisms in the evaluation of impact:

- They omitted all consideration of impact on the Lanner, which is without doubt the most important conservation consideration in the area, and on the Red Kite, subject of a reintroduction project;
- They seriously underestimate the effects on nesting raptors, on migratory birds, and on bats, some of whom are of considerable conservation value;
- They do not take into account the close proximity to the existing wind farm in the comune of Scansano (the mortality rate of the different species ought to be calculated taking into consideration both the 10 existing turbines and the proposed 6)
- They do not take into account of the conservation projects being carried out within the neighbouring ZPS/SIC IT51A0018, and in particular the existence of a considerable contingent of raptors present in the area thanks to the creation of artificial feeding sites (“*carnai*”).

As far as bats are specifically concerned, the proposal seems not to take enough notice of the technical indications contained in the document “Wind Turbines and Bats: Guidelines for the planning

process and impact assessments”, adopted at the Conference of the Parties of the Agreement for the Conservation of the Population of European Bats – EUROBATS – with resolution 5.6 of 2006; which has been revised (point 7 of the above resolution is obligatory), which has recently been published in revised form (Rodrigues, L., L. Bach, M.-J. Dubourg-Savage, J. Goodwin & C. Harbusch 2008: Guidelines for consideration of bats in wind farm projects. EUROBATS Publication Series No. 3 (English version). UNEP/EUROBATS Secretariat, Bonn, Germany, 51 pp), to which the evaluations should refer.

In the light of technical directions contained in the guidelines adopted by EUROBAT, we make the following specific criticisms surrounding the investigation techniques utilized to carry out the report.

- The identification of roosts was carried out in a 5Km radius of the wind farm site, while the guidelines recommend a radius of 10Km.
- The investigations intended to verify the presence of bats were conducted with bioacoustic detection in July 2009. The above guidelines state the necessity of collecting this data both in late summer and in autumn.
- There was no analysis of the flying height of the relevant species. All the affected species can achieve significant flying heights, even over 40 metres. Therefore this aspect needs to be investigated more thoroughly, using appropriate techniques.

On the basis of the considerations expressed above, we believe the conclusions presented in the technical document edited by SCS Ingegneria Srl to be inadequate.

It should also be mentioned that among the supervisors of the document are a number of professional figures, but there is no mention of zoological experts. This circumstance suggests that the technical report was not edited by persons competent to do so, or that the final conclusions relative to the proposed wind farm was not shared by the ornithological and the zoological supervisors of the sections relating to the wildlife characteristics of the site.

Compatibility relating to information provided in “Resolution on the Impact of Industrial Wind Turbines on Bird Life” discussed and approved at the 15th Convention of Italian Ornithologists

During the course of the latest Convention of Italian Ornithologists held in Sabaudia, Latina, 14-18th October 2009, much attention was given to the problems relating to the planning and building of wind turbine power stations with respect to the need to protect bird life. At the end of the convention, the participants discussed and approved a resolution that gives a useful tool for anyone seeking to evaluate the impact of these installations on bird life; attached is the text of the resolution.

As reported in the resolution, the wind turbine power station under discussion should not be built for the following reasons:

- Because it falls within an IBA
- Because it falls within areas regularly populated by species of conservation interest susceptible to significant impact (included in Appendix 1 of the Directive 79/409/CEE, migratory and other species listed in international Conventions and Agreements, Red Lists, or those given priority at regional level)
- Because the ornithological investigations carried out in the study of incidence was not carried out with sufficient depth.

Conclusive Considerations

The realisation of the installation under discussion is incompatible with the conservation needs of ZPS/SIC IT51A 0018, “Monte Labbro e l’Alta Valle dell’Albegna” and the interests of certain priority species present in the area. In this site there are currently numerous projects, partly paid for by EU funds, and there are grounds to suppose that the building of a wind power station would undo much of the hard work carried out so far, causing a considerable waste of public funds. We therefore maintain that the fears expressed by the Agency are justified. On this basis, we propose an unfavourable verdict to the realisation of this installation, setting out in detail the problems mentioned above.