



Position statement on Avifaunal and Bat Impact Assessment for Wind Energy Facilities in South Africa

Endangered Wildlife Trust & BirdLife South Africa

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The Endangered Wildlife Trust (EWT) and BirdLife South Africa (BLSA), two of the largest conservation NGO's in South Africa, fully support the responsible development of a renewable energy industry in South Africa. We recognize the need for a cleaner, more diverse energy mix, and acknowledge the predicted imminent shortfall of energy supply versus demand. We also sympathize with the wind energy industry which has experienced significant regulatory uncertainties to date, making it a challenging arena in which to operate.

The EWT and BLSA believe that there are however aspects of the avifaunal and bat impact assessment process for projects to date that are expressly not in the interests of sustainable development. We are of the opinion that this process has so far been inadequate in several ways and can fairly easily be improved on future projects to bring it in line with internationally accepted best-practice.

To this end, the EWT and BLSA would like to underline their conviction that the following conditions are essential for adequate precautionary and strategic decision making, and thus for their ongoing support for Wind Energy Facility applications:

1. The avifaunal and bat impact assessment schedule must allow for the collection of adequate relevant field data to support an appropriate decision on whether and how each project should proceed. The absence of data should no longer be interpreted to mean the absence of impacts. To this end, an initial information baseline (obtained through a pre-construction monitoring programme extended over a minimum of 12 months) is required for all proposed Wind Energy Facilities. A 12 month period is necessary in order to provide an opportunity to cover the various forms of variation which we experience in our arid and semi arid environment, and is in line with international best practice.
2. Bird and bat monitoring protocols for all proposed Wind Energy Facilities should conform with those laid out in the "EWT-BLSA Best Practice Guidelines for Avian

Monitoring and Impact Mitigation at proposed WEF sites in South Africa” and the “South African Good Practice Guidelines for Surveying Bats in Wind Farm developments 2011”, (to be finalized during March 2011), or the developer should motivate adequately for any deviation from these standards.

3. All Wind Energy Facility applications for which Environmental Impact Reports have already been compiled must conduct pre-construction monitoring of bird and bat impacts as stipulated in those reports, and this monitoring must be conducted as far as possible as per the above guidelines. Further the results of this monitoring must materially inform the final layout and mitigation plans of each Wind Energy Facility.
4. Site alternatives must be considered as part of the pre-feasibility or desktop scoping process for all projects, particularly given that correct siting is widely agreed to be the primary means of mitigating wind farm impacts on birds and bats.
5. Environmental authorizations should not be issued in the absence of finalized turbine and associated infrastructure positions. Adequate impact assessment requires the location of the proposed activities to be explicit, particularly with regard to Wind Energy Facilities, where impacts are extremely site specific.
6. All Wind Energy Facility applications should be subject to the full avifaunal and bat impact assessment process as detailed in the above mentioned EWT-BLSA guidelines.

The EWT and BLSA are approaching the interaction between birds and bats, and wind energy proactively through the development of the above guidelines, and the development of an “avian wind energy sensitivity map”, which will become available during 2011. It is hoped that a similar map for bats will also be available in future.

We encourage the wind energy industry to demonstrate that it is a progressive industry with respect to biodiversity, as well as carbon and economic benefits. While we understand that there are modest cost implications of advance baseline monitoring, we emphasize that in order to be sustainable wind energy should not be a significant additive factor which tips threatened bird and bat species towards extinction.

We feel confident that advance monitoring as proposed above will facilitate a sustainable wind energy industry.

The EWT and BLSA are advised on matters relating to birds, bats and wind energy by their “Birds and Wind Energy Specialist Group”, which comprises the following members:

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