



JI Projects:

Compatibility of Climate Change Mitigation with Other Environmental Aspects

Climate Change in South-Eastern European
Countries: Causes, Impacts, Solutions

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Presenting Bulgarian Society for Protection of Birds



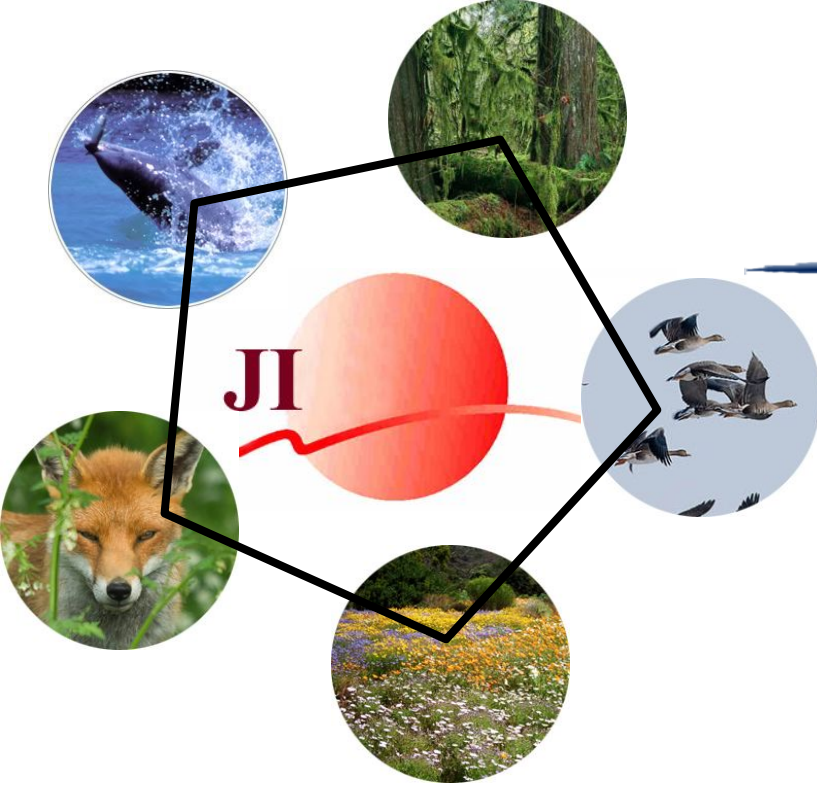


Bulgarian Society for Protection of Birds



- the leading environmental NGO in Bulgaria (founded in 1988)
- dedicated to biodiversity conservation
- works for the protection of wild birds and their important areas and habitats
- constructive in its work with the central and local institutions, and consider them as partners
 - ✓ helps the government in developing strategic documents
 - ✓ appointed from the government to develop the network of Special Protection Areas under the EU NATURA 2000
 - ✓ the only one ENGO entrusted by the state with the management of a protected area.


Environmental Sustainability of JI Projects



Need for foreign investments
+
Lower level of environmental
protection
=
Potential jeopardizing of the
JI mechanism

Question setting:

- Is it possible that the JI mechanism might financially reward investment initiatives with dubious environmental impact?
- Are there sufficient safeguards in the JI procedure which to reduce this possibility to minimum?



UNFCCC & *Sustainable Development*

- The Convention on Climate Change and the Kyoto Protocol serve a higher purpose than climate protection - the one of Sustainable Development

UNFCCC Art 4.1 (f):

All Parties shall... employ appropriate methods, for example **impact assessments...** with a view to **minimizing adverse effects** on the economy, on public health and on **the quality of the environment**, of projects or measures undertaken by them to mitigate or adapt to climate change.



Environmental Safeguards in the JI determination procedure

JI Project Design Document (PDD) shall include:

SECTION F. *Environmental impacts*

F.1. Documentation on the analysis of the environmental impacts of the project in accordance with procedures as determined by the host Party;

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Ministry of Environment,

Approves Environmental Impact Assessment of a project

Public comments

From Parties, stakeholders and accredited observers

Unpopular tool for publicity

7 projects with a comment from 37

Accredited Independent Entity (AIE)

Determines whether the documentation on Environmental Impacts is in accordance with procedures as determined by the host Party...

Jl Supervisory Committee

Examines whether the Jl guidelines and procedure are met and appropriately dealt with by the AIE.

Environmental Safeguards in the JI determination procedure

Track 2 - Verification through
Accredited Independent Entity &
JI Supervisory Committee

Track 1 - Host Parties may verify projects and
reductions by its own guidelines and procedures

~~Accredited Independent Entity
JI Supervisory Committee~~

Question setting:

- Is it possible that the JI mechanism might financially reward investment initiatives with dubious environmental impact?
- Are there sufficient safeguards in the JI procedure which to reduce this possibility to minimum?

NO???

Bulgarian Experience with Joint Implementation

“Pool of Small Hydro Power Stations and Wind Energy Parks Project”

- 20 wind generators (in 7 small wind parks)
- about to get the determination of the Independent Entity

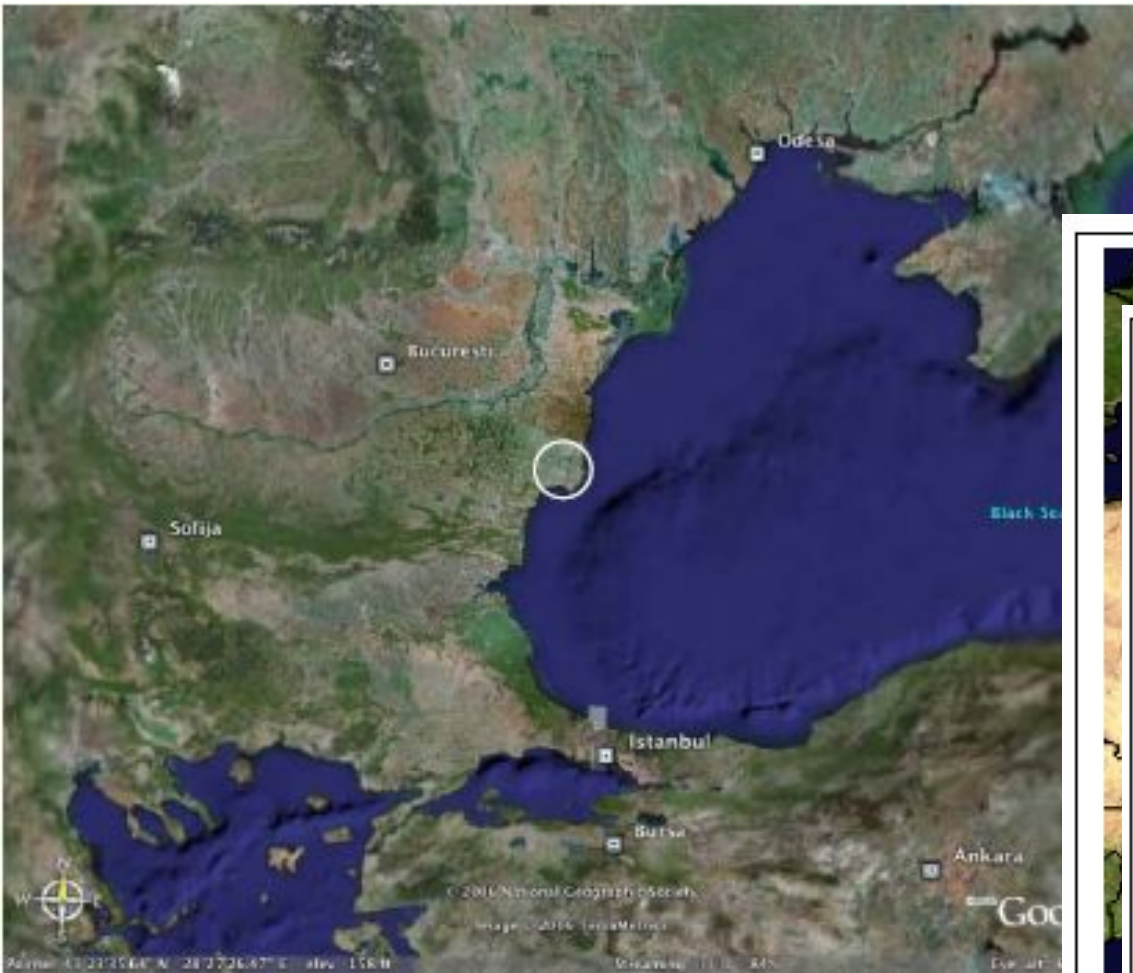
„Kaliakra Wind Power Project” (KWPP)

- 35 wind generators
- project funded by Mitsubishi Heavy Industry Ltd.
- just published on the UNFCCC web page;
the period for public comments will be opened soon



Via Pontica

- the second biggest migration flyway in Europe after V ia A tlantica
- over 5 million birds use it during spring and autumn migration
- birds come from Central and Eastern Europe, from as far west as Belgium, and even from W estern Siberia.



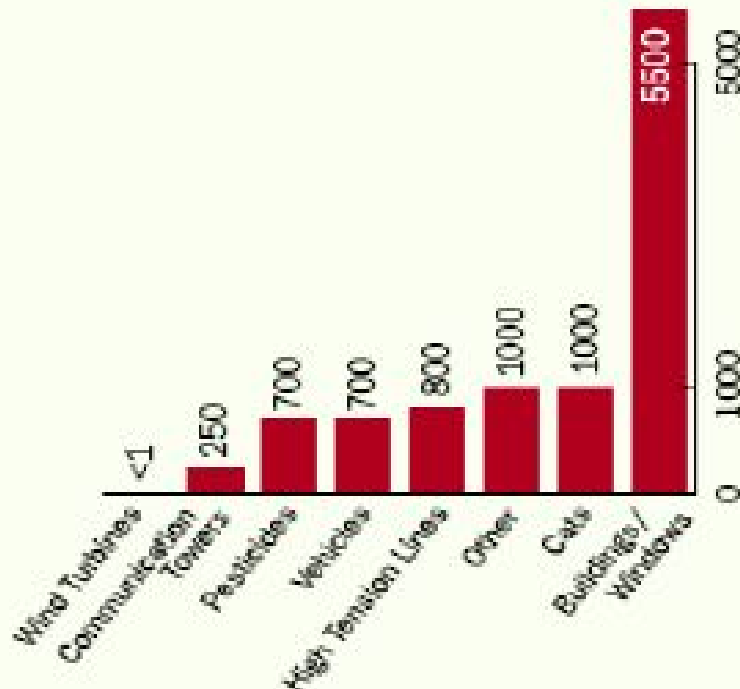
White Storks satellite tracking (Argos system) →

“Pool of Small Hydro Power Stations and Wind Energy Parks Project”

- 11 wind generators within IBA Kaliakra
- No need for Environmental Impact Assessment - decided by the Regional Environmental Inspectorate

Wind Turbines: Compatible with Birds

Causes of Bird Fatalities, Number per 10,000 fatalities



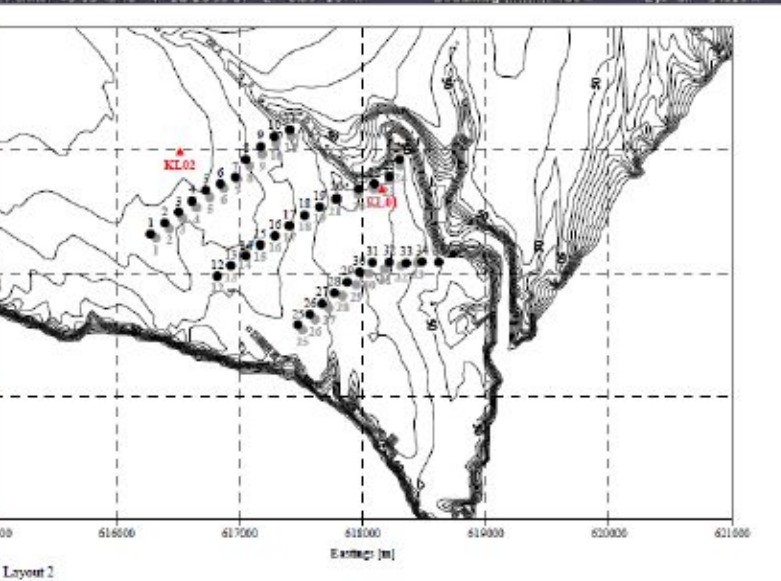
Data Source: Erickson et al. 2002. Summary of Anthropogenic Causes of Bird Mortality.

In the PDD Section F „*Environmental Impacts*“:

„Influence over the birds population and migration

A very good evidence of how small is the negative influence of the wind turbines over the birds is presented by “Windpower Outlook 2006”.

„K aliakra Wind Power Project“



- 35 wind turbines near the coastal line
- EIA performed → no threat for the environment in every aspect
- EIA consisted of no analysis on the bird migration
- the construction of the wind generators has just started

Overall 96 wind turbines have been consented and further more are in planning stage:

- without any assessment of their cumulative effect;
- looking forward to carbon financing through JI.



Bern Convention on the Conservation of European Wildlife and Natural Habitats

The committee opened a new file
about the Kaliakra wind farms
/11.2006/

Independent report:

- very high local concentrations of migratory birds
- wind farms are likely to produce regular mass casualties
- EIA did not consider these aspects
- alternative sites further inland would release the potential risk considerably

Recommendation 117 (2005) - to the Bulgarian government to reconsider building wind farms in Important Bird Areas.

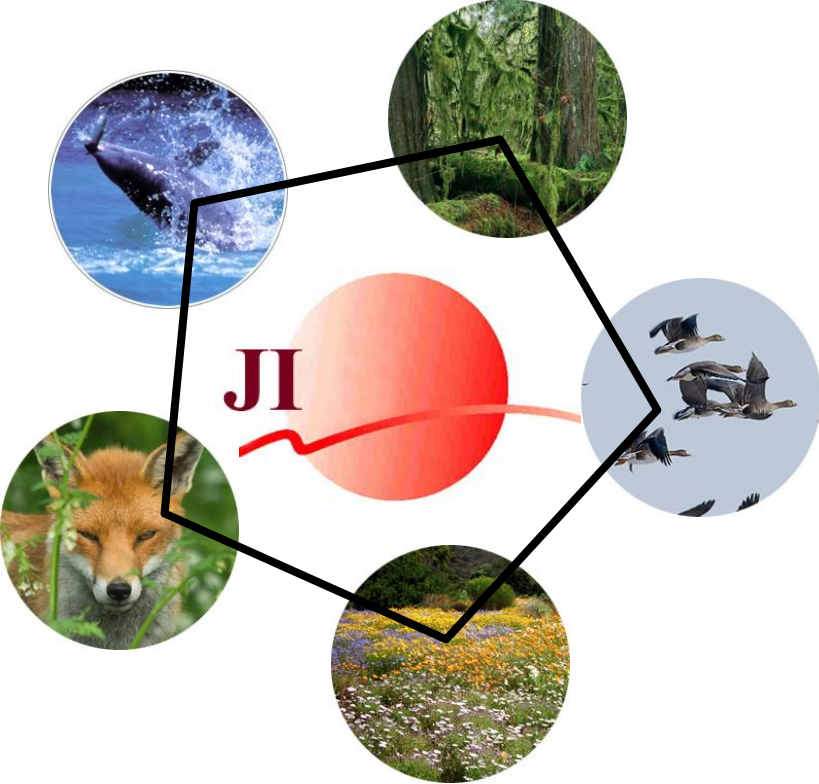


European Commission

- EU Court ruling:

Sites that deserves classification should be treated in the same way regardless of whether or not they are formally classified.

- EC is taking legal actions against Poland about projects encroaching potential Natura 2000 areas.
- Issues regarding the wind farms in IBA Kaliakra as well as its delayed designation as a part of Natura 2000 have been already raised in the EU Parliament.



Are we about to have projects financed through the Kyoto flexible mechanism which are in contradiction with other international conventions?

Is it so easy to ignore that one day we might have to pay sanctions for destroying EU habitats through JI projects?

Is the Convention of Climate Change not supposed to guard the objectives of sustainable development?

Issue: *Sustainable* mitigation (and adaptation)

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