



Trondheim, 18. Dec 2020

To the Commission of the European Union

Our comments on

ANNEX I:

«Technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives»

Your ref: Ares (2020)6979284 - 20/11/2020

We are grateful for the opportunity to submit comments on this draft, and we limit this letter to comments on electricity generation from wind power.

In our part of Norway there have been installed a significant number of large wind turbine installations in pristine nature areas during the last years, especially along the coastline, where the Sea Eagle and other birds are killed in significant numbers. The red-listed Eagle Owl (the world's largest owl) has lost nesting areas, and the future of Sami reindeer herding in this area is threatened.

Due to these and other significant negative impacts on nature and climate, we believe that most of these wind energy installations should not be classified as "green" in the EU taxonomy.

Our detailed comments:

4.3. Electricity generation from wind power

	To be assessed in the taxonomy	Comments
(2) Climate change adaption	Wind power installations should not be built in areas where peat is drained/ damaged due to the installation.	In Norway, onshore wind turbine installations are usually located in areas, where roads and other constructions often damage marsh lands, with thick peat layers. In Norway, the peat can be up to 8 meters deep, containing large amounts of stored Carbon, released when the peat is drained/ damaged.
(3) Sustainable use and	The risk of fluctuating water streams due to fast hydro power balancing	To balance variable wind production, Norwegian hydro power stations are often forced to fast production regulation. This leads to fluctuating water

protection of water and marine resources	should be avoided for wind turbine installations.	streams. Sometimes salmon spawns are captured on dry land in large numbers, due to a fast reduced water stream. Large adjacent wind turbine installations increase the risk locally, especially when there is a limited transmission line capacity in the area and the load situation demands fast balancing.
(4) Transition to a circular economy		No additional comments.
(5) Pollution prevention and control	The amount of micro-plastic pollution from a wind turbine installation, and the methods of blade maintenance should be assessed.	There is a significant wear of turbine blades, especially the leading edge. This leads to microplastic pollution of nature, cultivated land, streams and the sea. Maintenance is usually done with personnel hanging by the blade, using grinding machines. Dust particles from the grinding are seldom taken care of. This increases the pollution.
	The amount of harmful liquids, and arrangements for collecting spills should be assessed.	In Norway, it is mandatory to have arrangements for collecting spills of cooling oil, hydraulic oil and other harmful liquids from transformers, hydropower stations etc. So far, wind turbine installations have been exempted from similar arrangements at the turbine feet. In cases of total breakdown of tower or hub, liquids are spread widely around.
(6) Protection and restoration of biodiversity and ecosystems	Wind turbine installations should not be placed in pristine nature areas and should especially not be placed in Sami reindeer herding areas. The impact from wind energy on bats must be assessed.	<i>1. Land use change/ diminishing pristine nature areas.</i> Norway has a system for characterising pristine areas (INON) as areas with more than 1 km to the nearest significant technical intervention. Most wind turbine installations in Norway lead to significant reduction of INON areas. Large areas of nature with no, or little human activity or technical interventions are divided into smaller, separated nature areas. This is damaging to many species. We also refer to UN-IPBES report of 2019, stating that land use change is the most severe threat to nature and nature species. Most Norwegian wind turbine installations contribute to severe land use change. This is a threat to both birds, other animals, and plants. <i>2. Threat to nature-based Sami reindeer herding</i> Many, or most wind turbine installations from Mid-Norway and up north, are placed in areas important

		<p>for Sami reindeer herding. Sami organisations protest, but the authorities seldom listen. This is a violation of The ILO Convention no. 169 on the Rights of Indigenous Peoples. The southern part of the Sami reindeer herding area (Mid-Norway), is especially vulnerable. Due to a significant number of large wind turbine installations in important herding areas in Trøndelag, the future of Sami reindeer (and Sami culture) herding is threatened in this area. In addition to being a violation of Sami rights, this also reduces a sustainable and old traditional harvesting from nature.</p> <p><i>3. Impact on bats</i> Hitherto, Norway has never, or almost never, assessed the impact of wind energy installations on bats. According to EUROBATS (Agreement on the Conservation of Populations of European Bats), all undersigning countries should assess how wind energy installations affect bats. There are also migratory bats, moving between southern European countries and Norway in spring and autumn. Along the Norwegian coastline they pass numerous wind energy installations.</p>
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Yours

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