



BirdLife South Africa

Position Statement on Wind Energy and Biodiversity Offsets

BirdLife South Africa supports the responsible development of wind energy in South Africa. Wind energy can, however, impact on birds by causing loss of habitat, disturbance and/or mortality through collisions with the wind turbines and associated transmission infrastructure. Where negative impacts on avifauna are anticipated, biodiversity offsets are sometimes proposed as a solution. Biodiversity offsets are “*measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development after appropriate prevention and mitigation measures have been taken*”¹. The aim of biodiversity offsets is to achieve no net loss (or a gain) of biodiversity on the ground.

Biodiversity offsets, in the context of birds and wind energy in South Africa, poses a number of challenges. Should biodiversity offsets be considered for a wind energy project, the following points must be noted:

The mitigation hierarchy must be followed.

Biodiversity offsets should only be considered once the ‘mitigation hierarchy’ has been exhausted. It must be proved that every effort has been made to prevent or avoid negative impacts, then to minimize such impacts, and only then to remedy them. Biodiversity offsets should only be considered as a last resort and in exceptional circumstances.

Following the mitigation hierarchy may require the consideration of alternative sites.

There are a numerous sites available for the development of wind energy in South Africa. BirdLife South Africa is therefore of the opinion that consideration of alternative sites is a critical part of the mitigation hierarchy. BirdLife South Africa will most likely request the consideration of alternative sites prior to any agreement on a biodiversity offset.

¹ Business and Biodiversity Offsets Programme (BBOP). 2013. To No Net Loss and Beyond: An Overview of the Business and Biodiversity Offsets Programme (BBOP), Washington, D.C.
Available from www.forest-trends.org/biodiversityoffsetprogram/guidelines/Overview_II.pdf.

Biodiversity offsets require a clear understanding of the impacts.

In order to identify an appropriate offset, it is important to have a clear understanding of what the potential residual impacts on bird life will be. Wind energy is new to South Africa and understanding of the impacts on birds is thereof still in its infancy. While predicting and quantifying direct habitat loss from development is relatively simple, predicting and quantifying the displacement of birds at wind farms remains challenging. Similarly, any predictions relating to the number of mortalities as a result of collisions are likely to be inaccurate. BirdLife South Africa therefore suggests that these limitations must be recognised while identifying an appropriate offset and a precautionary approach should be adopted.

We suggest further that, given the high levels of uncertainty, a flexible approach to mitigation and offsets may be required throughout the lifecycle of the project. If unanticipated negative impacts occur, it may be necessary to consider voluntary offsets as a last resort should additional mitigation measures not prove to be effective (this would fall outside of the environmental authorisation process).

Biodiversity offsets can impose a substantial burden on stakeholders.

Biodiversity offsets can be complicated and time consuming for all stakeholders involved. For example, they may require complicated legal and financial agreements, additional studies, and ongoing monitoring and review. When considering whether a biodiversity offset is appropriate and desirable, the indirect costs to all stakeholders should be considered.

Biodiversity offsets should address the impact (“like for like” or better).

Biodiversity offsets should be designed to address the residual negative impacts on the habitat or species (or suite of species) concerned. For example, if a particular habitat is lost and this loss is predicted to be of moderate to high significance, a similar habitat, or ideally better habitat, should be conserved. If the residual negative impact is mortality, the proposed offset should clearly demonstrate that it will compensate for these losses by maintaining the status of the population in question. Conservation actions that do not address a particular threat to the species or habitat in question should not be considered an appropriate offset.

Offsets should be for the duration of the impact.

Biodiversity offsets should, at the minimum, be applicable for the duration of the impact. This could be limited to the lifespan of the facility (assuming the impacts are immediately reversible once the activity ceases), but could require conservation action in perpetuity (in the case of irreversible habitat loss). In such a case, the required conservation action should remain the responsibility of the holder of the environmental authorisation.

Knock-on effects of the offset must be considered.

When considering the desirability of an offset, consideration should be given to whether the proposed conservation actions could have knock-on impacts on the ecosystems. In most instances it will not be considered desirable to artificially manipulate the natural environment.

Offsets cannot compensate for irreversible impacts of very high negative significance.

BirdLife South Africa will not support a proposed wind farm that is predicted to have irreversible negative impacts of high to very high negative significance on birdlife. In such instances we are of the opinion that the proposed development should not be approved and biodiversity offsets are not appropriate and should not be considered.

Summary

BirdLife South Africa suggests that biodiversity offsets should only be considered in exceptional circumstances. We will not support a proposed biodiversity offset unless we are convinced that the mitigation hierarchy has been followed and there are no suitable alternatives. We will also not support a biodiversity offset unless it can be clearly demonstrated that the offset will result in restoring, or improving the status of the species or habitats in question.

September 2013