

Dear Sir/Madam,

This is a written contribution from BirdLife International, a global bird conservation organisation with regional headquarters in Brussels and Wageningen, to the open consultation on the extension of the major Trans-European transport axes to the neighbouring countries and regions of the EU, as announced on the TEN-T Website of the European Commission. Our response is focused in particular on question number 7 under section "Which are the major axes?" in the "questions to stakeholders" document. The question relates to particular environmentally sensitive areas that must be taken into account when identifying major transport axes in the relevant countries.

BirdLife International has carried out a major exercise to identify so-called Important Bird Areas (IBAs) in all the European territories. The latest continent-wide up-date of the European inventory of IBAs was published in 2000 (Heath, M.F. and Evans, M.I. (eds.) Important Bird Areas in Europe: Priority sites for conservation). Important Bird Areas are identified using a set of scientific criteria standardised at the sub-regional, regional and global levels. Within the European Union, IBAs identified by BirdLife International has been recognised by the European Court of Justice as the best scientific reference when evaluating the completeness of the network of Special Protection Areas (SPAs) designated under Directive 409/79/EEC on wild birds. These sites therefore are of the highest biological and conservation importance for wild birds, both within and outside the EU. When developing projects, plans or programmes outside its boundaries, the EU should strive to apply the same high standards of avoiding significant negative impacts to these sites as it is applied to SPAs within the EU. This is especially important due to the fact that some of the countries considered in the consultation (Croatia, Turkey) are lined up as potential future EU member states, who should already be harmonising their national legislation in line with the requirements of EU Directives and Regulations.

The location, geographical position and other essential information concerning Important Bird Areas throughout Europe is publicly available on the Website of BirdLife International. More specifically, information on IBAs in the countries relevant to the consultation exercise can be found on the following Websites:

Albania:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=2>

Belarus:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=20>

Bosnia-Herzegovina:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=27>

Croatia:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=52>

Macedonia:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=239>

Moldova:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=139>

Russia:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=174>

Serbia and Montenegro:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=235>

Turkey:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=214>

Ukraine:

<http://www.birdlife.net/datazone/sites/index.html?action=SitHTMLFindResults.asp&INam=&Reg=7&Cty=219>

Some of these inventories are currently being up-dated. The lists contain all sites currently identified within each of the countries concerned, without reference to planned infrastructure developments. In general terms, any new transport infrastructure development, be they roads, railways or inland waterways, as well as ports and airports, should take into consideration the need to maintain the ecological integrity of any of the listed IBAs. Transport corridors should be designed to avoid any negative impact on these sites from the point of view of their qualifying bird species and their habitats. The safest (although by no means the only) practical way to ensure this is to avoid any physical impact within the boundaries of these sites by transport infrastructure, be they new or up-grading existing ones.

We at BirdLife International were planning to try to identify sites that are at particular risk to the potential extension of the TEN-T network to the neighbouring countries. We asked DG Transport for the GIS layers of the TEN-T network and its extensions, which we have received a few days ago. Given the time limitations of the consultation exercise, we were not able to use this data to identify sites that are potentially or likely to be affected by the proposed transport corridors in the neighbouring countries and regions to the EU, similar to the study we conducted in 2001 with regards to the potential impact of the then TINA network (Fisher, I. and Waliczky, Z. An assessment of the potential impact of the TINA network on Important Bird Areas in the accession countries).. Nevertheless, we are hoping to carry out this exercise at a later date, if possible. When we manage to complete this exercise, we will inform DG TREN of the results.

I hope the information provided by us will be of value when designing the future extension of the TEN-T network. If you require further information on our data and regarding the above comments, please do not hesitate to contact me.

Yours sincerely,

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The RSPB is the UK charity working to secure a healthy environment for birds and and wildlife, helping to create a better world for us all. The RSPB is the BirdLife International Partner in the UK.