



Rabat, 22 December 2021

### Note to the EBRD

I have been requested for my opinion on the development of the Koudia Al Baida Repowering Project in an area well known as a flyway for migratory birds.

Having read the Environmental and Social Action Plan (ESAP), which is among the outcomes of the EBRD's Due Diligence on the Project, and held discussions with the EBRD (via video-link), I would hereby like to express my opinion about the Project's feasibility on behalf of GREPOM/BirdLife Maroc.

I am of the view that the site shows average to high sensibility for birdlife, but that the measures proposed to prevent or mitigate impacts on diversity are fit for purpose; such being the case, we confirm our full support for construction of the wind farm, as it is part of the Kingdom's plan on accelerating the pace of energy transition.

Nonetheless, as regards the measures concerning the risk of collision of migratory birds with wind turbines during the operation phase, I recommend that the avifauna collision risk modelling based on the additional avifauna studies due to be conducted in the spring of 2022 should be updated, and, in light of the findings, that the Developer of the wind farm should be invited to adopt a more robust environmental management plan through further mitigation measures, if this is not already the case.

Should new collision models reveal that the mortality rate recorded for the target species listed in the initial collision report exceeds the acceptable threshold, we recommend that new mortality-reducing measures be adopted and that a base radar<sup>1</sup> be installed to detect the species with human assistance so as to, on the one hand, facilitate interpretation of the data recorded and, on the other hand, transmit instructions to the operators of the wind farm to temporarily shut down the turbines at issue.

The proposed support to the Jbel Moussa vulture rehabilitation facility aims to permit the migration of birds while reducing their mortality rates. Such support would increase the facility's accommodation capacity, making more food supplies available to the vultures, and thus enabling them to boost their energy reserves before continuing their onward migration, thereby certainly mitigating the risk of them frequenting the wind farm area.

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<sup>1</sup> Translator's note: we believe this refers to a base reflectivity radar  
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Moreover, the facility aims to provide the assistance that birds need if they have been weakened, and to treat those with injuries.

If the measures as proposed are adequately applied, I believe the repowering project is feasible, especially since it ranks among the least environmentally harmful energy projects.

This attestation is issued to the EBRD solely for the purposes of the Koudia Al Baida repowering project.

Rhimou El Hamoumi

Director, GREPOM/ BirdLife Maroc

*[Stamp and signature]*