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Copy: Director General of Danish Ministry of the Environment, Lars Hindkjær
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Denmark the 8th January

Dear Mark Duchamp and Sherri Lange

I wish to point out that a letter dated the 6th January 2012 from Lars Hindkjær to Mark Duchamp and Sherri Lange contains some serious errors.

1. The 2006 regulations introduced a new noise limit for a wind speed for 6 m / sec, but no noise limit at any other lower wind speed.
The regulations mean that wind turbines in the countryside may generate noise of 42 dB (A) at a wind speed of 6 m / sec and of 44 dB (A) at 8 m / sec in the immediate environment of human habitation. There is no limit on turbine noise in areas more than 15 m from an actual dwelling house. At all other wind speeds than 6 m / sec and 8 m / sec there are no noise limits at all!
2. It is claimed in the letter that the Danish EPA receives rather few complaints about noise from wind turbines. Perhaps the main reason for this is that the regulations mandate that these complaints should be made to local authorities. It is also well-known in Denmark that the Danish EPA, while claiming to have “best knowledge”, refuses to accept that the noise levels permitted in Denmark can cause serious annoyance to many, also to the extent of being a threat to their health, despite the large body of peer-reviewed scientific work pointing this out. Thus neighbours of wind turbines in Denmark are well aware that complaints about wind turbine noise directed to the Danish EPA will fall on deaf ears.
3. It is claimed in the letter that “As to our knowledge, wind turbine noise has no different health effects from other types of noise.” There is, however, much in the more recent peer-reviewed scientific literature to suggest that this “knowledge” is out of date.
It is also claimed that “The Danish noise limits for wind turbines are comparable to our recommended noise limits for industrial noise”. This is not correct; for example, the recommended noise limit for industrial noise in residential areas at night is 35 dB(A), whilst the limit for wind turbine noise in such areas at night is always 39 dB(A) and can often be 44 dB(A).
4. The last section of the letter is misleading, to put it mildly.
The following is a translation of part of Professor Henrik Møller’s letter that is mentioned in Lars Hindkjær’s letter.

"During my most recent communication with you, the EPA emphasized that the existing noise limits should not be strengthened. However, our calculations show that the suggested

limit for low-frequency noise will in many situations be exceeded, even though the existing noise limits are satisfied. In these situations the implementation of the low-frequency limit will thus be a strengthening of the noise limits, colliding with the precondition for the revision. We have neither technical nor scientific basis for suggesting methods of calculation that show anything else.

With this given precondition it is thus impossible for us to contribute to the revision. (I will abstain from commenting on the reasonableness of introducing limits when it has been decided beforehand they should not in reality make a difference.)

You are welcome to contact me again if the preconditions for the revision change.

The letter is attached in its entirety, but it is in Danish.

It does not appear that the EPA has been interested in using Professor Møller's considerable, and widely respected, expertise in this area.

By contrast, the Danish EPA has chosen to consult closely with the Danish Wind Industry Association. Documents from the EPA obtained via a freedom of information request show that there have been extensive discussions with the Danish Wind Industry Association, and that the Association and the EPA have reached an understanding of the "factual" assumptions to be made.

In this context it is thought-provoking to remember that the CEO of Vestas, Ditlev Engel, wrote to the Minister for the Environment recently to argue against noise limits, arguing that Vestas' commercial interests required the continued use of Denmark as a full-scale laboratory. This lobbying seems to have succeeded, with substantial help from the Danish EPA.

Sincerely

Danish National Association of Neighbours to Giant Wind Turbines

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