

Strasbourg, 23 February 2017
[files50e_2016.docx]

T-PVS/Files (2016) 50

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

36th meeting
Strasbourg, 15-18 November 2016

Other complaints

**Presumed negative impact of hydro-power plant
development on the Vjosa river
(Albania)**

- COMPLAINT FORM -

*Document prepared by
EcoAlbania, Albania*

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM

NB: Complaint forms must be submitted in electronic word format, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis.

Please, fill in this form and send it to the attention of:

Ivana d'ALESSANDRO

Directorate of Democratic Governance, Culture and Diversity

Council of Europe

F-67075 Strasbourg Cedex

E-mail: Ivana.DALESSANDRO@coe.int

First name: Olsi

Surname(s): Nika

On behalf of (if applicable): Center for Protection of Natural Ecosystems in Albania (EcoAlbania)

Address: Rr. Kavajës – Vaçë Zela | P. Qendra Tregtare "GLOBE" | Shk. 1 | Ap. 11/3 |

Town/City: Tirana

County/State/Province: Albania

Postcode: 1023

Country: Albania

Tel.: +355 44 31 7720

Fax: -

E-mail: o.nika@ecoalbania.org | contact@ecoalbania.org

Web site: www.ecoalbania.org

Date: 25.07.2016

Electronic Signature

1. Please state the reason of your complaint (refer also the Contracting Party/es involved and the Articles of the Convention which might be violated).

The Vjosa River in Albania is one of the last large intact river systems in Europe. From the Pindus Mountains in Greece to the Adriatic Sea it flows freely without artificial obstacles. We are concerned that the massive hydropower development that is foreseen on the Vjosa and its tributaries will cause irreversible damage to this European heritage and its fauna and flora. This complaint is particularly pressing since the Albanian government has given the concession to build a large dam on the Vjosa in May 2016. The project "Poçem" features a 25 meter high dam that would affect the most valuable section of the river. However, no environmental permit has yet been issued by the responsible authority (National Agency for Environment) in regard to the Poçem project.

A total of 28 hydropower plants are projected in the Vjosa basin: 8 on the Vjosa itself and 20 on its tributaries. An additional five hydropower plants have already been constructed on two tributaries in the last years. While the Albanian government is pushing for new hydropower plants, it fails to have proper Environmental Impact Assessments (EIA) prepared for these projects. Hence, protected species and habitats are at risk.

We are concerned that Albania might not respect Article 1, point 2 and might violate Article 4, point 1, 2, 3 and 4 as well as Article 6 (b) of the Bern Convention.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

Geographic information: The Vjosa/Aoos catchment is a transboundary ecosystem extending between Greece and Albania. It is one of Europe's last big natural rivers. Along its entire course of about 270 kilometers (except the headwaters in Greece) it is untamed, free flowing and characterized by a high variety of hydro-morphological features. Together with its tributaries, the Vjosa provides a dynamic, near-natural ecosystem that is without par in Europe (outside Russia) (see Annex III attached). In some parts, the river landscape expands up to 2 kilometers in width, covering the entire morphological valley. This braided river system is characterized by large gravel banks with pioneer vegetation, islands, side arms, oxbows, ponds, and alluvial forests with *Platanus orientalis*, Willows (*Salix* spp.) etc. The undisturbed morphodynamic processes with its enormous sediment shift lead to a constant natural regeneration of these habitats, as well as to a lateral erosion, producing large-scale, steep riverbanks.

However, there are major gaps in knowledge about the hydrology, geomorphology, ecology and biodiversity of the river system. Nevertheless, limited available data indicates that the Vjosa area constitutes a major biodiversity hotspot for the country (see Annex I; Annex II & III attached to this complaint). According to this data, 177 species that belong to the Appendices of the Bern Convention live in the Vjosa area: 3 species of vascular plants, 9 insects, 32 amphibians and reptiles, 112 birds, 9 mammals and 12 fish species. (see Annex I attached to this complaint).

Most of these species live in the section of the river threatened by the Poçem project. This area provides breeding ground for the Stone-curlew (*Burhinus oedicephalus*), foraging grounds for the Little tern (*Sterna albifrons*), Egyptian vultures (*Neophron percnopterus*), and the Lesser Kestrel (*Falco naumanni*), as well as an important habitat for the otter (*Lutra lutra*). Due to the lack of knowledge, the status of some species is unclear, for example the Little tern (*Sterna albifrons*), which is regularly seen in the Poçem area and below, but nesting sites have not been recorded yet.

A detailed overview of all species of the Appendices of the Bern Convention that have been found in Vjosa catchment as of now is attached to this complaint (Annex I).

3. What might be the negative effects for the specie/s or habitat/s involved?

All hydropower projects are being planned without any proper EIA or SEA. Currently, the most urgent project is the Poçem HPP on the Vjosa River. This project would destroy a unique ecosystem. The braided river section with its large gravel banks and islands is up to two kilometers wide and enormously dynamic. This area is to be flooded by the project's reservoir. In addition to these effects, the Poçem hydropower plant would also have severe impacts up- and downstream of the dam. It would block the upstream and downstream migration of many fish species and prevent sediment transport downstream towards the Adriatic Sea. Trapped behind the dam wall, the lack of sediments leads to riverbed incision, decline of the groundwater level and even to strong beach erosion in the delta area. In addition, the water quality would deteriorate due to a reduced self-purification rate in the reservoir. The water temperature increases (= less oxygen) so that a lot of the species could not survive. Given the high temperatures in the Vjosa region, the production of methane gas in the reservoir is likely.

Another severe downstream effect of the Poçem project would be caused by hydropeaking. According to our information, Poçem is projected to produce peak electricity, meaning that the river would be flushed downstream of

the dam at least once a day, while the rest of the time the Vjosa would have a reduced discharge. There is scientific evidence that hydropowering has disastrous impacts on biodiversity. Additionally, the construction of the dam leads to new infrastructure like roads, bridges, transmission lines etc. which will result in the fragmentation of still unspoiled habitats, even outside the alluvial system. To sum it up, the Poçem project is threatening to destroy these valuable ecosystems directly through flooding, to block the migration of species and the sediment transport, and to impact the downstream section of the Vjosa, most likely all the way to its mouth into the Adriatic Sea. This would lead to an enormous decline in biodiversity due to direct or indirect habitat loss and/or deterioration of water quality. The birds would lose their nesting habitats (e.g. Stone curlew and Little ringed plover) as well as their foraging grounds (e.g. Little Tern, Common Tern, Black Tern, Egyptian vulture).

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald network site?

There are 10 bird species, 2 mammal species and 2 fish species that are part of the CMS Annexes. Particularly outstanding out of those is the European eel (*Anguilla anguilla*), which migrates from the Adriatic Sea to the upper section of the Vjosa. This species would be directly affected by Poçem as well as other dam projects. Another important fish species is *Acipenser stellatus* which was recorded in the lower part of the Vjosa. Due to downstream effects of the dams, this endangered species could be negatively affected. Based on the quality of the habitats, the entire Vjosa valley qualifies as Emerald site and requires protection. The Albanian authorities designated only few parts of the Vjosa valley as protected areas, ignoring the significant value of one of the last large intact river systems in Europe and specifically disregarding the most valuable and dynamic section of the Vjosa ecosystem between Tepelena and Selenica which are planned to be destroyed by hydropower developments. The existing Emerald site "Protected landscape of the wetland complex Vjose – Nartë" (19.412 ha, IUCN category IV) would potentially be affected by the dam projects. This protected area is also proclaimed as a RAMSAR site and IBA (Important Bird Area).

5. Do you know if there are any pending procedures at the national or international level regard-ing the object of your complaint?

* The EU Parliament criticized the Albanian government for its hydropower policy, especially on the Vjosa. ([EP Resolution](#) 2016). See text in Annex II attached this complaint.

* In July 2016 scientists from Albanian and other European countries requested a 3-year moratorium on hydropower development in the Vjosa basin from the Albanian government. The time period is to be used for an extensive research program on biodiversity, hydrology and especially the sediment transport, in order to estimate the impact of the dam projects. (See Annex III attached this complaint).

* EcoAlbania will soon file a lawsuit to the Administrative Court of Albania in regards the concession Poçem HPP.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc)?

* Find the hydropower projects within the Vjosa River catchment. Map available at: <https://www.google.com/maps/d/viewer?mid=1iu8oOeb0FWbNlbet7tEieUuxS9M>

* Official data published on the Ministry of Energy and Industry website regarding the Poçem Hydro-power Project announcing the winners of the concession; available in Albanian language at: https://www.app.gov.al/ep/DF_DocumentViewer.aspx?id=bde3e226-e0cf-4141-97c6-b60d33965f6b

* Preliminary EIA Report for Poçem HPP in Albanian language at: <http://www.akm.gov.al/assets/raport-i-thelluar-i-ndikimit-ne-mjedis-vjosa-varianti-i-2-per-akm.pdf>.

APPENDICES

- Appendix 1: Overview of species found in Vjosa valley, included in the Appendices of the Bern Convention and Convention for Migratory Species (CMS)
- Appendix 2: Extended Rapport about Vjosa catchment
- Appendix 3: Memorandum – Research requirements for a sustainable development on the Vjosa River corridor