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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

36<sup>th</sup> meeting  
Strasbourg, 15-18 November 2016

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**Closed file**

**Presumed impact of a construction of Overhead  
Power Line (OHL) in an environmentally  
sensitive area in the Lithuanian-Polish  
borderland**

**- REPORT BY THE COMPLAINANT -**

*Document prepared by  
the Association Rudamina Community (Complainant)*

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**CLOSED FILE 2013/5: PRESUMED IMPACT OF THE CONSTRUCTION OF AN OVERHEAD POWER LINE IN AN ENVIRONMENTALLY SENSITIVE AREA IN THE LITHUANIAN-POLISH BORDER**

*Report by the Association Rudamina Community (Complainant)*

August 15, 2016

The Complainant would like to bring to the attention of the Bureau to the Bern Convention the following two points:

1. On June 7<sup>th</sup>, 2016, the Complainant received from the Ministry of Environment a document called a Program for Environmental Impact Monitoring (hereafter- the Program) for the 400 kV Overhead Power Line (hereafter- the OHL) Alytus- Lithuanian State Border, 2016-2018. The received document was prepared for the OHL project developer AB LITGRID and it had already been approved by the State Agency for the Environmental Protection under the Ministry of Environment. The Ministry of the Environment asked the Complainant to provide its comments or suggestions. Having reviewed the document, the Complainant responded to the Ministry of Environment and expressed its objection that the project developer AB LITGRID is at the same time the owner of the Program. Based on the materials that are presented in the complaints under the Aarhus (ACCC-98) and Bern (2013/5) Conventions, respectively, the Complainant sees AB LITGRID being in conflict of interests. Moreover, the Complainant as the public concerned expresses its disagreement that AB LITGRID as a business entity is entrusted to take the main responsibility for organizing monitoring, accumulating the environmental data, systemizing and summarizing it and presenting to the authorities described in the legal acts. The Complainant is deeply concerned that the Republic of Lithuania is assigning organization and implementation of monitoring to a business entity, whose actions created a situation of the Country as a Contracting Party occurring in the scope of the supervision bodies of the above mentioned Conventions. Such an attitude of the Authorities creates a condition for further negative impacts of the LitPol Link OHL project on the protected species and habitats as well as on the local communities.

Furthermore, the Complainant would like to draw attention of the Bureau that the prepared and approved Program did not contain any reference to the Recommendation No. 175 (2015) adopted by the Standing Committee of the Bern Convention on the monitoring of the agreement concluded in the frame of complaint n° 2013/5. Neither the Program takes into account the other closely related construction in the same environmentally sensitive area, the Gas Interconnector Poland-Lithuania (GIPL), to be launched in fall 2016. Therefore, the Complainant does not see the Program as a remedy to eliminate further risks and negative impacts of the newly started large infrastructural projects.

2. During 2016, the Complainant has not been informed by the Authorities about any specific measures for protecting and/or restoring the natural habitats of *Emys orbicularis* as one of the most vulnerable species that were damaged by the OHL construction, especially close to the Lake Galadusys Natura 2000 site PLH200007.

Sincerely,

Dr. Ramūnas Valiokas,  
on behalf of the Association Rudamina  
Community