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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Standing Committee

46th meeting,
7-11 December 2026,
Strasbourg

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Bureau of the Standing Committee

22-24 September 2026,
Strasbourg

Open File: 2013/01

Hydro power development within the territory of the Mavrovo National Park (North Macedonia)

- REPORT BY THE COMPLAINANT -

Document prepared by
Eco-svest

To the Secretariat of the Bern Convention

Subject: Update on recent developments regarding Mavrovo National Park and the Ribnicka HPP

Skopje, 02.09.2026

Dear Secretariat of the Bern Convention,

We would like to inform the Secretariat of recent developments concerning the re-proclamation process of Mavrovo National Park.
Regarding the re-proclamation process, concerns remain as the Ministry of Environment and Physical Planning appears to informally support the development of the Ribnicka small hydropower plant (HPP). During a meeting with the Minister on May 22, representatives from the water sector did not express objections to hydropower development within protected areas, while also underestimating the obligations stemming from the Bern Convention.

Additionally, Mavrovo National Park authorities have continued to resist the prepared valorization study and proposed zonation. Furthermore, NP Mavrovo, alongside a small hydropower investor and the local Municipality, organized a public hearing to advocate for hydropower development within the park boundaries. During this hearing on June 21, the organizers expressed strong disagreement with the position of Eko-svest on the re-proclamation and demonstrated limited alignment with established nature conservation goals.

On a positive note, local communities from Grekaj and Tanushe actively participated in the June 21 hearing to voice their opposition to the Ribnicka HPP, referencing the technical and environmental concerns detailed by Eko-svest. Moving forward, these local communities are pursuing legal remedies to oppose the project.

In August the local communities reported that activities for clearcutting of the forest for the purpose of road clearing have taken place, Eko-svest raised the concerns publicly with a press release supported by a legal analysis on the case.

We will keep the Secretariat updated on further developments.

Sincerely,

Ana Colovic Lesoska

Eko-svest

To the Secretariat of the Bern Convention

Skopje, 17.02.2026

Subject: Update on the Complaint No. 2013/01: North Macedonia: Hydro power development within the territory of Mavrovo National Park

Dear Ms. Siino,

With this letter we are providing the Secretariat new information related to the case file 2013/01 as requested in your letter dated December 19. 2025.

Ban of small hydropower plants

I. At the 133 session of the Government of North Macedonia held on December 12, 2025, the issue of extension of deadlines for the start of construction of several hydropower plants were discussed, one of them located in Shar Mountain national park- HPP Vejachka (discussed under point 28 of the agenda).

The minutes from this session state that: The Government reviewed the Information regarding the Request of the concessionaire AK Hidro 2016 DOOEL Tetovo for the extension of the deadline for construction and the commencement of commercial operations of SHPP Vejačka, including an Annex to the Agreement, and adopted it with the following conclusions:

1. The Minister of Environment and Physical Planning is hereby authorized, on behalf of the Government of the Republic of North Macedonia as the grantor, to conclude an Annex to the Concession Agreement for the use of water for the production of electricity from a small hydroelectric power plant, SHPP Vejačka No. 11-2142/1 dated March 26, 2018, for the extension of the deadline for construction and the start of commercial operations until June 2, 2026.
2. The Ministry of Environment and Physical Planning is tasked with requesting that the concessionaire AK Hidro 2016 DOOEL Tetovo extend the validity of the bank guarantee for the quality performance of the Agreement until at least August 3, 2026."

Let us point out the fact that this is at least the second time this concession has been extended, after the adoption of Recommendation 211 that clearly states that no hyropower concessions in national parks should be further extended.

II. At the 126 session of the Government of North Macedonia held on November 11th, The Government discussed under point 40 the following:

Information with a proposal for the consensual termination of the Concession Agreement for the use of water for the production of electricity from small hydroelectric power plants, SHPP Žirovnica with ref. no. 5, SHPP Žirovnica with ref. no. 6, and the Concession Agreement for the use of water from small hydroelectric power plants SHPP Železna 15 and SHPP Železna 17.

The minutes from this session state that "The Government reviewed the Information with a proposal for the consensual termination of the Concession Agreement for the use of water for the production of electricity from small hydroelectric power plants, SHPP Žirovnica with ref. no. 5, SHPP Žirovnica with ref. no. 6, and the Concession Agreement for the use of water from small hydroelectric power plants SHPP Železna 15 and SHPP Železna 17, and thereby concluded:

- The Ministry of Environment and Physical Planning is hereby tasked, by November 25, 2025, to prepare and submit to the Government information regarding the concluded agreements and the total amounts of the agreements for the granted concessions for hydroelectric power plants in national parks and other protected areas across the entire territory of the country."

We made efforts to obtain this information from the Ministry, but without success.

On this point we would like to inform that this process has been going on for more than 2 years, without concrete steps taken and as a result, the agreements have not been terminated.

III. At the 138 session of the Government held on December 23, 2025, the contracting hydropower companies to construct hydropower plants in national parks was discussed under point 39. At the same sessions, two other concession contracts were extended, one of them located in Shar Mountain national park (point 37)

On point 37, the Government reviewed the Information regarding concluded concession agreements for the use of water for the production of electricity through the construction of small hydroelectric power plants located in national parks and adopted it with the following conclusions:

1. The Ministry of Environment and Physical Planning is hereby tasked, within 30 days, to prepare and submit to the Government information regarding the procedure for the re-proclamation of Mavrovo National Park.
2. It is recommended that the Public Institution for the Management and Protection of the Shar Mountain National Park, within 60 days, find a solution for the **unhindered realization** of SHPP Karanikolos (ref. no. 80), including all supporting facilities, as well as inform the Government regarding the possibilities for the realization of SHPP Pena 84 and SHPP Pena 85.
3. The Office of the Prime Minister of the Republic of North Macedonia is tasked with preparing and submitting, by the next Government session, a Draft Methodology aimed at resolving the issues arising from the concluded concession agreements for the use of water for electricity production through the construction of small hydroelectric power plants located in national parks.

It is evident that the Government is urging the Shar Mountain national park authority to ensure the construction of the hydropower plant Karanikolos.

Regarding the Methodology for resolving issues from contracting hydropower projects in national parks, we inform that we have not received any information, or invitation to participate in the preparation of this document.

IV. Announcement of new and old hydropower projects by the Prime Minister was shared by national media, where among other projects, Mr. Mickoski openly speaks about re-starting of the Boshkov Most hydropower project, the main focus of the 2013.01 case file. The announcement of the Prime Minister was made during the World Economic Forum held in Switzerland in January 2026.

Reproclamation of Mavrovo

After the International Nature Conference held in Skopje, we organized a meeting with the Cabinet of the Prime Minister, the National Park Mavrovo authority and the Ministry of environment and physical planning to discuss the process of re-proclamation of Mavrovo (October 28, 2025).

It was evident at the meeting that the national park authority is not accepting the Re-valorisation study and socio-economic study prepared by the Ministry of environment and physical planning and supported by various international donors.

The process has not progressed. The national park authority has issued a letter stating that they do not agree with the results of these documents and therefore will not continue the process of re-proclamation.

There has been no development ever since.

We fear that the stopping of this process will be devastating on the natural values of the park and the Park is threatened by losing its legal status (as the national park has not been re-proclaimed since 2010, the last deadline for re-proclamation according the Nature law).

Adoption of Nature Law and Water Law

No new developments for the adoption of these laws has been noted in the past months. Eko-svest and 14 other organisations sent a letter to the Minister of environment and physical planning (January 21, 2026) asking for urgent development and adoption of a new Nature Law. The Ministry officially replied that they have started preparation of the law.

Having all of the above mentioned updates, and the decision of the Stranding Committee to conduct an on-the-spot appraisal for this case, we urge the Secretariat to immediately request a date for the visit and reach out to the Cabinet of Prime Minister, Ministry of environment and physical planning and National park Mavrovo to initiate a discussion and provide timely advice in these key processes.

We remain at your disposal for any further questions,

Sincerely,

Ana Colovic Lesoska

Eko-svest