



Strasbourg, 5 February 2025

T-PVS/Files(2025)2016-9_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
Strasbourg, 8-12 December 2025

Bureau of the Standing Committee
8-10 April 2025
Strasbourg

Complaint on Stand-by: 2016/9

**Possible threat to “Svaneti 1” Emerald Site (GE0000012)
from Nenskra Hydro Power Plant development (Georgia)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
Association Green Alternative*

Mr. Mikaël Poutiers - Secretary of the Bern Convention
Mr. Marc Hory - Project Manager
Mr. Michaël Nguyen - Administrative and Project Manager

**Subject: Complaint No. 2016/9 - Possible threat to “Svaneti 1”
Candidate Emerald Site (GE0000012) from Nenskra Hydro Power
Plant development (Georgia).**

DEAR MR. POUTIERS,
DEAR MR. HORY,
DEAR MR. NGUYEN,

Hereby we send an update by the complainant relevant to Complaint No. 2016/9 - Possible threat to “Svaneti 1” Candidate Emerald Site (GE0000012).

1. Nenskra and other large hydropower plants in the Ten-Year Network Development Plan of Georgia 2024-2034

In November 2024, the [Ten-Year Network Development Plan of Georgia 2024-2034](#) elaborated by the Transmission System Operator JSC “Georgian State Electrosystem” was approved by the Minister of Economy and Sustainable Development of Georgia. The Nenskra hydropower plant was listed alongside 218 other hydropower plants as perspective HPPs with predicted data. Nenskra (280 MW), Khudoni (702 MW) and Namakhvani cascade (433 MW) are the largest in the list. One of the purposes of the project Jvari-Tskaltubo-Akhaltzikhe transmission line is ‘*safe Evacuation of generation power to the main grid: Khudoni HPP, Nenskra HPP, HPPs of Enguri and its tributaries, Tskenishtskali Cascade, Namakhvani Cascade and Kheledula HPP; transmit this power to the consumers (Tbilisi-Rustavi nodes) and as an export (to Armenia and Turkey).*’

2. The loan of EBRD canceled, but EIB, ADB, and AIIB still might finance Nenskra

In 2024, the status of the USD 214 million loan by the European Bank for Reconstruction and Development for the Nenskra project was changed to [cancelled](#). The [European Investment Bank](#) loan (USD 150 million) remains approved, despite the [findings of the complaint mechanisms](#) of both banks that the project violates their own environmental and social policies. The [Asian Infrastructure Investment Bank](#)’s loan (USD 100 million) and the two loans by the [Asian Development Bank](#) (USD 314 million total) remain proposed.

3. One more year without protection of large rivers in the Emerald Network in Georgia

In spite of the approved targets for the development of the Emerald Network until 2030, one more year there is no improvement in the protection of large rivers in Georgia, as they are almost completely excluded from the [Emerald Network](#), and out of 13 freshwater habitats of concern, 8 are insufficiently protected. Georgia has had very limited progress in tackling the insufficiency after the last biogeographical seminar and many of the areas highlighted as missing continue being unprotected: Rioni, other rivers, Javakheti plateau, and Kazbegi mountain.

4. In 2024 human rights situation in Georgia significantly worsened

The introduction and adoption of several repressive laws in 2024 and early 2025 undermined not only the freedom of expression but directly threatened the existence of civil society in general, including the complainant (Green Alternative).

The “Law on the Organizations Serving the Interests of a foreign power”, known in Georgia as “Russian law”, obliges NGOs and media who receive financial support outside the country to register as “organizations serving the interests of a foreign power”. The ruling party Georgian Dream (GD) claimed that the law aims to promote transparency, but other than the official rhetoric, the timing of its introduction, and its substantive provisions suggest it aims to discredit and marginalize independent groups and media.

Before adopting the law, the ruling party and its supporters started repressive measures against CSOs including Green Alternative: the entrances to the offices of the NGOs were pelted with eggs and covered with specially printed posters and offensive messages by masked people. Like several leading advocacy groups, Green Alternative reported it to the police, but it did not even register the claims.

Tens of thousands of people protested the law continuously following its introduction in April 2024. On multiple occasions, during especially large demonstrations in front of the parliament building, police used tear gas, water cannons, and pepper spray to disperse mostly nonviolent protesters. The police arrested hundreds on misdemeanor charges and the courts imposed fines on many after perfunctory trials. Over a dozen journalists and media representatives were injured because of police use of force during the protests.

The “Russian Law” was followed with the authorities adopting other discriminatory and anti-LGBTQ laws, imposing restrictions on rights to education, health, freedom of expression, and peaceful assembly.

In October 2024, the ruling party claimed to achieve a “decisive victory” in a highly disputed parliamentary election, which opposition parties, President Salome Zurbashvili, and independent observer groups claimed was marred by intimidation, vote-buying, and fraud. Moreover, in November, the ruling party suspended efforts to open EU accession negotiations until late 2028, prompting mass, countrywide protests. The police repeatedly used excessive force against demonstrators protesting the election aftermath and the government’s decision to abort the EU accession negotiations. It groundlessly fired tear gas, water cannons, and rubber bullets at protesters. Violent mobs, presumably associated with authorities, participated in beating protesters. Several hundred protesters were arrested on misdemeanor and criminal charges. Many reported beatings and ill-treatment in detention; dozens required hospitalization.

In February 2025, the [ruling party unveiled yet another wave of legislative changes](#) designed to tighten its grip on power, ramping up penalties for a variety of offenses—many of which directly target protesters, critics, and political dissenters. The changes would lead to:

- no more spontaneous protests;
- steeper penalties for dissent and extended administrative detention up to 60 days;
- criminalizing speech and jail time for speech-related crimes;
- crackdown on resistance to police and harsher punishment for harming police;
- criminalizing vague ‘threats’.

In addition to the repression of CSOs, a smear campaign with hate speech has been initiated by politicians. In December 2024, [Prime Minister Irakli Kobakhidze accused three CSOs](#) - the Georgian Young Lawyers Association, the Social Justice Centre, and Green Alternative of “blocking” the Namakhvani HPP project indicating that adopted laws will be used exactly to address such organisations.

We call on the Bureau:

- **To send a strong signal to the Georgian government and the Council of Europe to protect civil society and that there is a high risk that the CSOs cannot continue to work in Georgia (as with complainants of case files from Belarus);**
- **To keep the file on stand-by or elevate it to a possible file if any construction in Svaneti starts;**
- **To request the government of Georgia to fulfill the conclusion of the 2021 biogeographical seminar.**

Best regards,

Mr. David Chipashvili - Association Green Alternative – complainant