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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
46th meeting
Strasbourg, 7-11 December 2026

Bureau of the Standing Committee
22-24 September 2026
Strasbourg

Open File: 2020/9

**Possible negative impact of hydro-power plant
development on the Neretva River (Bosnia &
Herzegovina)**

- COMPLAINANT REPORT -

Document prepared by
Center for Environment on behalf of the other Complainants: Aarhus Center in Bosnia and
Herzegovina, EuroNatur, RiverWatch, CEE Bankwatch Network & ClientEarth

**Update for the Autumn Bureau Meeting
July 2026**



CENTAR ZA ŽIVOTNU SREDINU
CENTER FOR ENVIRONMENT



No: 405/26

Banja Luka, 31st July 2026

All inputs presented on last Standing Committee Meeting are still relevant. There is no official information in relation to any developments in relation to HES Gornja Neretva project in Republika Srpska, nor three HPP project in Federation of BaH. Still, so far, there was **no further progress in implementation of the Recommendations No. 217 (2022).**

However, we use this opportunity to **report on further follow-up in relation to HPP Ulog permitting and incident from 12th September 2025** that led to mass suffocation of fish downstream of HPP Ulog¹, as follows:

1. Although a request for information was filed, so far, we have obtained **no official information on investigation** from the relevant PO's office after the incident.
2. We also inform you that the independent international **Expert report on the incident**, as a scientific model, for providing relevant insights in potential cause of the incident from September 2025, **was presented at the Republika Srpska Ministry for environment premises**, by the lead author, Mr. Gabriel Singer, and representative of Riverwatch, Mr. Ulrich Eichelman, and a representative from CfE. Relevant staff of the ministry in charge were present at that occasion and took notes of the report.
3. Despite this, we regret to inform you that the Expert report (scientific model) **was not taken into account** when reconsidering the renewal of the environmental permit for the HPP Ulog. Thus, the **renewed permit was issued on 1st June 2026** and it is valid until July 2030.
4. Ultimately, the only scientific evidence linking the incident with HPP operation (where the report showed **hydropeaking operation more than likely** in the time of incident), was **practically rejected** in relevant decision-making. The ministry argued that this is voluntary evidence, while there is still no official (institutional) report that would back the scientific model.
5. Before finalization of the renewal procedure, which was initiated by the investor, **CfE and Aarhus Center filed official requests** to the ministry for **recognizing administrative standing** in the procedure. This was requirement due to current legal framework, as the renewal procedures in Republika Srpska does not provide members of the public to have access to decision-making (as stipulated under art. 6 of the Aarhus Convention), as this is the case only when the initial environmental permit is being issued. Despite this unfortunate situation, CfE and Aarhus Center elaborated their access rights according to the General Administrative Act of Republika Srpska. Namely, the law specifically enables the ministry to grant administrative

¹ *Ecocide on the Neretva: Scientists raise alarm after mass fish die-off, September 2025*

standing to a party that demonstrates sufficient legal interest in a concrete proceeding. However, CfE's and Aarhus Center's requests to have access to decision-making which is very relevant to their interests (and rights) as CSO's, **was rejected as unfounded**. Both CSO's have challenged the specific ministries decision, upon which **a Court case is pending**.

6. Since **no access rights were granted** to professional environmental and legal-aid CSO's, which were involved in the protection of Upper Neretva River basin (CfE only for more than a decade), the ministry officially issued a **renewed environmental permit without adequate public participation** in a case where there was a significant public interest. Namely, despite the Federal ministry for environment and representative of the Delegation of the European Union in BaH also raised their concerns to the ministry, in a timely manner, the permit was still renewed **without prior determination of the cause of the incident** from September 2025 (possible hydropеaking).
7. CfE and Aarhus Center challenged the renewed permit, both due to procedural and substantive legal issues, upon which **a Court case is pending**.

Conclusion:

The above ultimately portrays the intention of relevant Republika Srpska institution(s) to, at least, continue with permitting of the HPP Ulog, despite complex impact on the environment which cannot exclude HPPs operation.

Unfortunately, all relevant authorities do not demonstrate sufficient interest to further implement Recommendations and/or facilitate any official follow-up to comply with Bern Convention.

Thus, we thank the Standing Committee for acceptance of the proposal to have a **Coordination meeting between the stakeholders**. Despite lack of institutional initiative, since no party objects the proposal—we kindly ask you to take steps necessary to have the coordination meeting as soon as possible.

Thank you in advance.

Sincerely,

President



Tihomir Dakić

On behalf of Complainants:

Aarhus Center in Bosnia and Herzegovina
EuroNatur
RiverWatch
CEE Bankwatch Network
ClientEarth