Strasbourg, 2 December 2025 **T-PVS/Files(2025)2022-9_comp**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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

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 Report dated 14 November 2025

CENTAR ZA ŽIVOTNU SREDINU
CENTER FOR ENVIRONMENT
Friends of the Earth Bosnia and Herzegovina

No: 590/25
Banja Luka, 14th November 2025

Directorate General of Democracy
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Bern Convention
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Attn.:
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SUBJECT: Update report on Open File: 2020/9, Possible negative impact of hydro-power plant development on the Neretva River (BaH)

Dear Mr. POUTIERS,
Dear Mr. HORY,
Dear Ms. MEDLINSKA,
Dear Ms. BUJAROSKA,

All inputs presented on the 44th Standing Committee Meeting in December 2024 are still relevant and, so far, there was no further progress in implementation of the Recommendations No. 217 (2022).

However, we use this opportunity to report on the incident from 12th September 2025 that led to mass suffocation of fish downstream of HPP Ulog[1].

The incident was reported to the relevant authorities, both local and entity inspection offices, while a criminal case was officially initiated by the Hercegovina-Neretva Canton Prosecutors Office. However so far, the investigation(s) did not result in official identification of cause of the incident, or they fail to do so.

Due to this, a letter of concern, that offered a *scientifically most plausible explanation for the observed massive fish die-off* and urgent recommendations, was addressed to relevant authorities by a consortium of 192 independent international experts[2]. Also, as we learned, a letter of concern was shortly sent by the Delegation of European Union in BaH to the relevant RS Ministry, asking for an adequate implementation of Recommendations No. 217 (2022).

Currently, an independent international Expert report on the incident is being finalized and it is planned to have it presented in late November on a special session at the Parliament Assembly of BaH.

We thus use this opportunity to draw your attention to this, and to inform you that the summary of the Expert report will be presented by a complainant's consortium representative, Mr. Andrey Ralev, Biodiversity Expert (CEE Bankwatch Network) on the 45th StC Meeting. The PPT will be sent by Mr. Ralev in due time.

Once again, we thank the Standing Committee for acceptance of the proposal to have a Coordination meeting between the stakeholders. Since, according to the latest report from Focal Point[3], no party objects the proposal—we kindly ask you to take steps necessary to have this meeting as soon as possible (ideally in-person).

Thank you in advance.
Sincerely,

President

CENTAR ZA ŽIVOTNU SREDINU
CENTER FOR ENVIRONMENT

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

[2] *Mass Fish Die-Off Below Ulog Hydropower Plant (September 2025) – Urgent Call for Immediate Investigation and Environmental Impact Review*

[3] *Government Report - T-PVS/Files (2025)2020-09_gov from 14th February 2025*

Tihomir Dakić

On behalf of Complainants:
Aarhus Center in Bosnia and Herzegovina
EuroNatur
RiverWatch
CEE Bankwatch Network
ClientEarth

Annexes

Annex 1: The tragic result of Ulog HPP releasing oxygen-depleted water: A mass fish kill on the precious Neretva.

Photo of dead fish, © Hrabren Kapić, Organizacija Sportskih Ribolovaca Konjic

Annex 2: Despite years of resistance, the Ulog hydropower plant went into operation in 2025, causing significant environmental damage.

Photo of the Ulog HPP, © Bahrudin Bandic

Annex 3: The upper Neretva is one of the most pristine river ecosystems in the Balkans.

Photo of the Neretva at Glavaticevo, © Bruno D'Amicis

Annex 4: Joint Press Release by Riverwatch and Foundation Atelier for Community Transformation – ACT. November 28, 2025.

This is a joint press release by Riverwatch and Foundation Atelier for Community Transformation - ACT

Ecological catastrophe on the Neretva: Deadly fish kill caused by Ulog hydropower operations

++ Scientists and NGOs call for immediate government action ++

SARAJEVO, Bosnia and Herzegovina – November 28, 2025 — Today, a coalition of international and Bosnian scientists, together with leading environmental NGOs, reveal evidence linking the mass mortality of fish and other aquatic life on the affected stretch of the upper Neretva on September 12, 2025, to operational practices at the Ulog Hydropower Plant (HPP). These findings are being formally presented today at a conference hosted by Foundation ACT and the Zeleni Klub (Green Club) at the Parliamentary Assembly of Bosnia and Herzegovina in Sarajevo.

On September 12, 2025, large numbers of dead fish including the softmouth trout (Critically Endangered) and European bullhead as well as the white-clawed crayfish (Endangered), were observed along the affected stretch of the upper Neretva River, accompanied by observations of fish gasping for air, crayfish crawling onto the shore, and an intense smell of rotten eggs—clear indicators of hydrogen sulfide abundance and severe oxygen-depleted conditions. The recently completed Ulog HPP cuts through the most valuable and previously intact river stretch of the Neretva, home to endangered species and high biodiversity, which is now directly impacted by the dam's operations.

The operators of the Ulog HPP do not hold a permit for hydropeaking. Yet, operators discharged oxygen-depleted water from the reservoir in a series of flush releases, directly causing lethal conditions for sensitive and threatened species. Scientists and NGOs stress that the environmental permit must be strictly adhered to and that the Environmental Impact Study (EIA) must be urgently reviewed and updated to prevent further ecological damage.

Prof. Dr. Gabriel Singer, University of Innsbruck, explains: *"Measurements we took on September 28, 2025—16 days after the fish kill—confirmed that the cause of the mortality was the release of severely oxygen-depleted deep water from the HPP reservoir. Ulog HPP is really an example of how NOT to do hydropower: these observable implications were predictable based on the reservoir's expectable stratification over summer and the current operational regime, and they are incompatible with the river's ecological health."*

"Our goal for this case is to serve as an example that energy development must be balanced with environmental preservation, and that decisions must be made based on scientific facts, not short-term commercial interests. The Neretva is one of the most valuable ecosystems in Southeast Europe, and its protection is the collective responsibility of all of us," concluded **Prof. Dr. Muriz Spahić**, former Dean of the Faculty of Science and Mathematics at the **University of Sarajevo.**

For more information about the findings, please refer to the factsheet and the executive summary **of the scientific investigative report**, as well as an open letter from September 29th, co-signed by 192 fellow scientists.

Call to Action

The Ulog HPP is still operating in violation of the environmental permit. Experts and NGOs emphasise that safe operation requires ecologically responsible reservoir management. Hydropower in the 21st century must not come at the cost of repeated ecological catastrophes. Immediate measures proposed include:

1. **Safe operation:** The Ulog HPP must cease hydropeaking and operate strictly in accordance with its existing environmental permit in run-of-river mode. There must be no further releases of deep, oxygen-deprived water, and any future permit must explicitly prohibit hydropeaking to prevent repeated ecological damage.

2. **Improve monitoring:** The plant must monitor and report, in real time, reservoir levels, water discharges, oxygen concentration, and temperature throughout the depth profile and downstream.
3. **Technical improvements:** Introduce technical solutions that ensure safe water quality downstream. This includes eemploying ecological and environmental models to forecast downstream risks, establishing minimum oxygen requirements and environmental flow criteria, improving deep-water oxygen levels and installing equipment that allows releases from different depths.

Ulrich Eichelmann, CEO of Riverwatch / Save the Blue Heart of Europe Campaign adds: *"The catastrophe in September not only killed fish, it wiped out all life in that section, including water insects, molluscs etc. If the Ulog hydropower plant is allowed to keep operating illegally in a peaking regime, unleashing near-daily floods and droughts on the Neretva, the devastating damage will not only be limited to the river stretch below the plant, but the fish populations throughout the entire Neretva, all the way to Konjic, will suffer irreparable harm."*

Background information

- The EFT Group's 35 MW **Ulog Hydropower Plant**, featuring a 53-metre-high dam and a 2.7 km derivation tunnel, was constructed by China's Sinohydro, completed in 2024, and began operation in 2025. Its construction and operation has already caused significant environmental harm to a section of the Neretva that was previously one of the most pristine river ecosystems in the Balkans. In addition, a series of seven smaller hydropower plants is planned further upstream by the local company Marvel d.o.o., which would transform roughly 38 kilometers of the river's upper course into a network of dams, tunnels, and reservoirs, putting its unique biodiversity at severe risk.
- Run-of-river versus hydropeaking operation: A **run-of-the-river mode** in hydropower refers to a method of generating electricity that relies on the natural flow of a river. The run-of-the-river plants generate power almost in real time, based on the river's current flow without large fluctuations. **Hydropeaking** is a hydropower operating method that varies the flow of water in a river to match sub-daily fluctuations in electricity demand. This causes rapid changes in water levels and flow rates downstream. It creates almost daily artificial waves, high water and low water levels .
- The "Save the Blue Heart of Europe" **campaign** aims to protect rivers of high natural value in the Balkans, which are threatened by over 3,000 hydropower projects. The campaign is coordinated by the international nature conservation organisations NGOs Riverwatch (AUT) and EuroNatur (GER) and is implemented jointly with partner organisations in the Balkan countries. In Bosnia and Herzegovina, our local partners are Foundation Atelier for Community Transformation - ACT, Centar za zivotnu sredinu (CZZS) and Aarhus Center in BiH. The campaign is supported amongst others by the Manfred-Hermsen-Stiftung.
- **Photos attached:** The attached photo material can be used once in connection with this press release and indicating photo credits. Information about the photos:
  1. The tragic result of Ulog HPP releasing oxygen-depleted water: A mass fish kill on the precious Neretva. © Hrabren Kapić, Organizacija Sportskih Ribolovaca "Konjic"
  2. Despite years of resistance, the Ulog hydropower plant went into operation in 2025, causing significant environmental damage © Bahrudin Bandic
  3. The upper Neretva is one of the most pristine river ecosystems in the Balkans. © Bruno D'Amicis

Contacts

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- Azra Berbić, ACT, azra@actbih.org +387 61 461 050
- Prof. Dr. Gabriel Singer, Department of Ecology, University of Innsbruck, gabriel.singer@uibk.ac.at
- Prof. Dr. Muriz Spahić, formerly University of Sarajevo, murizspahic@gmail.com

Annex 5: Handout "Fish kill in the Upper Neretva: What happened and what must change"

Fish kill in the Upper Neretva: What happened and what must change

Findings based on field measurements, hydrographic data, and remote sensing

What happened on 12 September 2025?

A large fish kill occurred on the Neretva River, downstream of the Ulog Hydropower Plant (HPP). Dead fish and crayfish were found along the banks, and the water smelled strongly of "rotten eggs." This happened shortly after **three sudden water releases** from the Ulog hydropower plant.

Species affected: hundreds of dead fish, including the rare softmouth trout (Critically Endangered) and European bullhead as well as white-clawed crayfish (Endangered).

What caused it?

The powerplant released oxygen-poor water from a deeper layer in the reservoir during an illegal, prolonged series of 'hydropeaks', i.e. sudden water releases from the reservoir. During summer, the deeper layers of the reservoir experience a strong decline in oxygen concentration. This happens because:

- Warming surface water floats on top of cold deep water. Due to this temperature stratification, the two layers no longer mix, and oxygen from the atmosphere cannot reach the deep layer.
- Isolated deep water becomes increasingly oxygen-poor as bacteria respire organic material from the submerged former forest and sinking algae.
- Prolonged decomposition of this material without oxygen leads to the formation of hydrogen sulfide (which smells like "rotten eggs") and potent greenhouse gases.

What evidence supports this?

Our scientific team combined **on-site measurements, flow data from a public hydrographic station,** and **satellite images:**

- In coincidence with the timing of the fish kill, downstream hydrographic data show a series of at least three clear 'hydropeaks'.
- A partial overlay of the hydropeaks with a natural flood prompted a flow partitioning analysis, which suggests that the third hydropeak was caused by an unusually long water release.
- Satellite data show a **significant drop in reservoir level** during the time of observed hydropeaking. Water volumes lost in the reservoir fit the estimates of runoff volumes associated with the hydropeaks.

Deep water in the reservoir had **extremely low oxygen levels**, and the HPP intake draws water from this depth.

All lines of evidence point to the **same cause: Improper release of deep, oxygen-poor water from the Ulog HPP.**

Why this matters

If nothing changes, this is **likely to happen again**, especially in late summer and earlya utumn when oxygen levels in deep water k are lowest.

On the day of the fish kill, **the HPP released oxygen-depleted and chemically altered water** from these deep layers. Fish and crayfish cannot survive sudden drops in oxygen.

What needs to be done immediately

The 12 September **fish kill was preventable.** It occurred due to the release of deep, oxygen-depleted water. It occurred due to poor management and failure to follow state-of-the-art hydropower operating principles.

To protect the Neretva and avoid future incidents, the Ulog HPP operators must:

- **Operate in accordance with the environmental permit** in **run-of-river** mode,
- **Stop hydropeaking,**
- **improve monitoring**, and
- introduce technical solutions that **ensure safe water quality downstream.**

Monitoring

The hydropower plant must monitor and report, in real time, the:

- reservoir level;
- discharge of water release; and
- oxygen concentration and water temperature (i) along a depth profile in the reservoir, (ii) of the released water, (iii) in the recipient downstream Neretva.

Technical improvements

- Install equipment that allows releases from different depths.
- Improve deep-water oxygen levels.

Safe operation

- Adhere to the legal requirements according to the permit of operation. The **mode of operation of HPP Ulog must be run-of-river.**
- Employ state-of-the-art ecological and environmental models to forecast risks of damage to downstream habitat and organisms.
- Do **not** release deep, oxygen-poor water during stratified periods and establish minimum oxygen requirements for any release.
- Monitor and manage nutrient inputs to avoid algal blooms in the reservoir.

November 2025

Annex 6: Summary of the ecological crime scene investigation report

Executive Summary of the ecological crime scene investigation report

Fish kill in the Neretva River in September 2025: Identifying water releases from the Ulog Hydropower Plant as likely cause

November 2025

Gabriel Singer (Innsbruck University, AT); Mirza Čelebičić (University of Tuzla, BiH); Kurt Pinter (University of Natural Resources and Life Sciences, AT), Muriz Spahić (Association of Geographers, BiH); Martin Dalvai Ragnoli (Innsbruck University, AT)

In September 2025, a major fish kill occurred in the upper Neretva River, immediately downstream of the newly constructed Ulog Hydropower Plant (HPP). Local fishermen reported hundreds of dead fish, including the critically endangered softmouth trout, as well as white-clawed crayfish. The fish die-off was observed directly following three abrupt rises in river discharge recorded at the Kašići gauging station and consistent with sudden reservoir releases ("hydropeaking").

The Ministry of Spatial Planning, Construction and Ecology of Republika Srpska publicly claimed there was no evidence linking the fish kill to Ulog HPP. Here, we present the results of an ad hoc investigation that refute this claim and identify Ulog HPP as a textbook case for ecologically destructive hydropower operation.

In early September, a fish kill occurred downstream of the Ulog Hydropower Plant, also claiming endangered softmouth trout and other endangered species. © Hrabren Kapić, Organizacija Sportskih Ribolovaca "Konjic"

Key Findings

1. **Strong reservoir stratification caused oxygen depletion in deep water layers.**
Depth profiles of **temperature** (red) and **oxygen concentration** (blue) in the reservoir near the dam (**Figure 1**), measured on 28 Sept 2025, indicate a clearly stratified water column. Temperature measurements reveal a warm, oxygenated surface layer, a sharp thermocline at 4-5 m depth (marked by horizontal red dotted lines), and a deep hypolimnetic layer isolated from atmospheric exchange. Oxygen concentrations show a pronounced minimum at the thermocline (as low as 0.68 mg L^{-1}) and remain **below critical survival thresholds for trout** throughout depths below 5 m—including the depth windows where water is drawn into the penstocks (dark grey bar at 9.6-13.5 m). While the shallow oxygen minimum reflects respiration of sinking algae from summer algal blooms, the low-oxygen conditions at greater depths are typical for newly flooded reservoirs with large amounts of decomposing organic matter from formerly forested land. The **penstocks** likely drew water from low-oxygen layers during the releases of early September, but if reservoir levels dropped—as confirmed by satellite data—extremely hypoxic water (<1 mg L^{-1}) may have reached the penstocks.

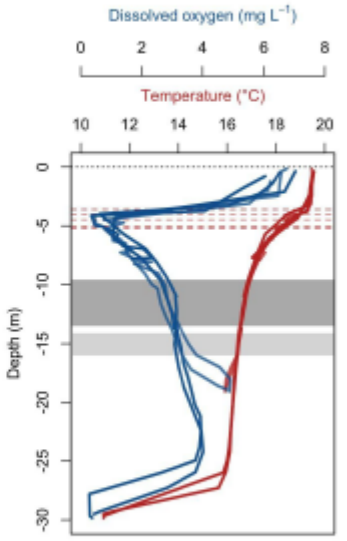

Figure 1: Depth profiles of temperature and oxygen in Ulog HPP reservoir.

2. **Analysis of public hydrograph** data shows multiple sudden flow increases that cannot be explained by rainfall alone. At the time of the fish-kill incident (**Figure 2**), two distinct hydropeaks raised the local discharge at the powerhouse by a factor of 15, thus creating sizeable and sudden flood events. These two hydropeaks were followed by a mixed discharge event, which could be decomposed into a rainfall-driven component and **a longer than average hydropeak** attributable to reservoir releases. The shape of the mixed event, in particular its rising and falling limbs, is inconsistent with natural flow patterns and strongly indicative of a substantial hydropeak that required ~34 hours of continuous reservoir release.

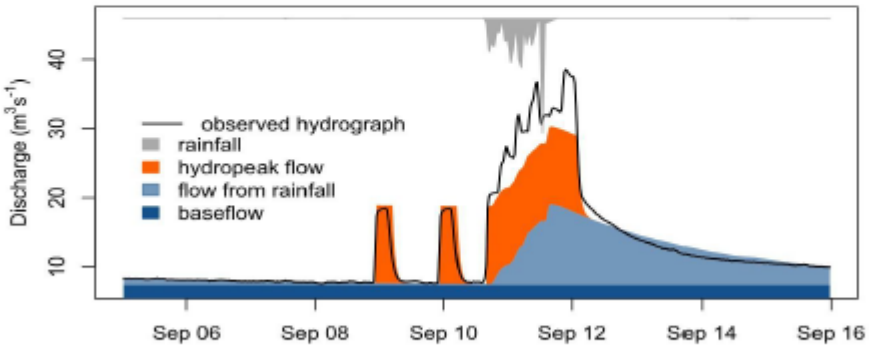

Figure 2: Results of hydrograph partitioning for flow during the fish kill incident.

3. **Remote sensing and reservoir volume changes:** Sentinel-2 imagery shows that the reservoir surface area decreased from 535,877 m² on 5 September to 404,498 m² on 12 September, corresponding to a water level drop of ~2.5 m and a net volume loss of 1.18 million m³. Even without accounting for simultaneously occurring inflow into the reservoir, this net volume loss can only be explained when the third long hydropeak is included in the computation of cumulative flow observed downstream. Remote sensing data thus confirms substantial operational releases coinciding with the fish kill incident.

4. **Downstream oxygen dynamics:** Re-oxygenation modelling indicates that oxygen-depleted water released from the reservoir would not gain oxygen quickly enough in the fast-flowing and deep Neretva River downstream of the powerhouse. Spatial modelling at the end of a modelled 6-hour hydropeak (**Figure** 3) identifies a low-oxygen (red) river section unsuited for trout survival, that extends from the powerhouse to at least the confluence with the Ljuta River entering from the north. The length of this 'death zone' matches the observed spatial extent of the fish kill, yet critical oxygen levels (yellow, ~6 mg/L) extend even further downstream. Notably, the river section with critical oxygen concentrations changes its length dynamically as a consequence of the hydropeaking flow regime, and thus likely acts as an ecological trap for trout moving in during the long periods with non-critical oxygen conditions. In contrast, the short section immediately downstream of the dam remains persistently hypoxic and is never suitable for trout survival.

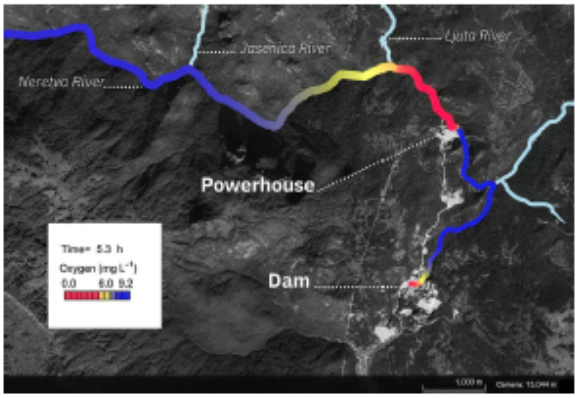

Figure 3: Patterns of oxygen concentration in the Neretva River downstream of the dam at the end of a hydropeak.

The Neretva downstream of the Ulog Hydropower plant. © Bruno D'Amicis

Conclusion

The fish-kill incident observed in the Neretva River in September 2025 was **highly likely caused by the operation of the Ulog Hydropower Plant**. All available evidence—from reservoir stratification, hydrograph partitioning, remote sensing, and re-oxygenation modelling—strongly supports the conclusion that **Ulog HPP operated in a hydropeaking mode**, releasing deep, oxygen-depleted, chemically altered water in sudden flow pulses, which suffocated fish and crayfish. **This mode of operation is in violation of Ulog HPP´s environmental permit.**

We recommend:

- Stop hydropeaking and enforce the operation of the Ulog HPP in accordance with its environmental permit in run-of-the-river mode.
- Install a monitoring system in the reservoir and downstream of the dam, that transparently reports oxygen concentration, water temperature and discharge. Such data may also be used to guide HPP operations.
- Keep the remaining sections of the Neretva River network free-flowing to safeguard its unique biodiversity.

Update Report dated 31 July 2025

CENTAR ZA ŽIVOTNU SREDINU
CENTER FOR ENVIRONMENT

Friends of the Earth
Bosnia and Herzegovina

No: 328/25
Banja Luka, 31st July 2025

Directorate General of Democracy
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SUBJECT: Update report on Open File: 2020/9, Possible negative impact of hydro-power plant development on the Neretva River (BaH)

Dear Mr. POUTIERS,
Dear Mr. HORY,
Dear Ms. MEDLINSKA,
Dear Ms. BUJAROSKA,

In relation to your letter requesting an update report, please be informed that there was no further progress in implementation of the Recommendations No. 217 (2022). All inputs presented on the 44th Standing Committee Meeting **in December 2024** are still relevant and, so far, there was no movement afterwards.

However, we recall our previous **update report**, and Bureau's decision from 6th December 2024 on accepting the proposal to have a coordination meeting with the authorities of Bosnia and Herzegovina to discuss the implementation of the Recommendation No. 217 (2022).

Once again, we thank the Standing Committee for acceptance of this proposal—and since, according to the latest report from Focal Point[4], no party objects the proposal to have a coordination meeting—we kindly ask the Bureau to take steps necessary to have this meeting as soon as possible (ideally in-person).

[4] Government Report - **T-PVS/Files (2025)2020-09_gov** from 14th February 2025

We kindly ask the Bureau to share any plans and/or information on the place/date/format of the coordination meeting, and let us know if any facilitation for this is needed.

Thank you in advance.

Sincerely, President

Tihomir Dakić

<u>On behalf of the other Complainants:</u>
Aarhus Center in Bosnia and Herzegovina
EuroNatur
RiverWatch
CEE Bankwatch Network
ClientEarth

Update Report dated 11 February 2025

CENTAR ZA ŽIVOTNU SREDINU
CENTER FOR ENVIRONMENT

Friends of the Earth
Bosnia and Herzegovina

No: 49/25
Banja Luka, 11th February 2025

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SUBJECT: 7th Update report on Open File: 2020/9, Possible negative impact of hydro-power plant development on the Neretva River (BaH)

Dear Mr. POUTIERS,
Dear Mr. HORY,
Dear Ms. MEDLINSKA,
Dear Ms. BUJAROSKA,

Hereby we are submitting our seventh update report regarding the case file No. 2020/9 (Possible negative impact of hydro-power plant development on the Neretva River, BaH).

Please be informed that there was no further progress in implementation of the Recommendations No. 217 (2022).

All inputs presented on the 44th Standing Committee Meeting in December 2024 are still relevant and, so far, there was no movement afterwards.

We would, however, like to use this opportunity to recall the Standing Committee's decision from 6th December 2024 on accepting the proposal to have a **coordination meeting with the authorities of Bosnia and Herzegovina to discuss the implementation of the Recommendation No. 217 (2022).**

A joint meeting would benefit all parties and hopefully would facilitate some movement after the Recommendations have been adopted and sent to relevant authorities in 2022. Therefore, we thank the Standing Committee for acceptance of this proposal, and we kindly ask the Bureau to take steps necessary to have this meeting as soon as possible.

In that regard, we would appreciate more information on when the meeting could take place, and what form of meeting is envisaged.

Of course, if possible, we would strongly recommend having an in-person meeting in Banja Luka and/or Sarajevo. In case this is not be possible, an on-line meeting would also be acceptable.

Please let us know if any facilitation in that regard is required, as we might be able to provide some assistance.

Thank you in advance.

Sincerely, President

Tihomir Dakić

On behalf of the other Complainants:
Aarhus Center in Bosnia and Herzegovina
EuroNatur
RiverWatch
CEE Bankwatch Network
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Centar za životnu sredinu / Center for Environment