



Strasbourg, 25 July 2025



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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**

45th meeting

Strasbourg, 8-12 December 2025

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**Bureau of the Standing Committee**

16-18 September 2025

Strasbourg

**Open case file: 2021/8**

**Possible threat to Rioni River from the Namakhvani Hydropower Project  
(Georgia)**

**- GOVERNMENT REPORT -**

*Document prepared by the  
Ministry of Environmental Protection and Agriculture of Georgia*

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**MINISTRY OF ENVIRONMENTAL PROTECTION  
AND AGRICULTURE OF GEORGIA**

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23 July 2025



N 5676/01

To: Ms. Alessandra SIINO Secretary of the Bern Convention

Cc: Permanent Representation of Georgia to the Council of Europe

Subject: Complaint on stand-by no. 2021/8: Georgia: Possible threat to Rioni River from the Namakhvani Hydropower Project

Dear Ms. SIINO,

On behalf of the Ministry of Environmental Protection and Agriculture of Georgia, I would like to extend our sincere appreciation for the Bern Convention's dedication to biodiversity conservation and its continued support of the field. With reference to the Bureau's decision concerning the "Complaint on stand-by no. 2021/8: Georgia: Possible threat to the Rioni River from the Namakhvani Hydropower Project," we would like to provide the requested update as follows:

Please be informed that draft law for establishment of the planned "Rioni river Managed Reserve" has been prepared along with proposed boundaries and requires further development for its adoption. At this point the draft law adoption is pending, though it remains in the Georgia's Development Strategy - Vision 2030.

We note that the complainant has stated that *"the most critical habitat—the sturgeon spawning grounds—remains unprotected."* However, we believe this and other similar observations in annual progress reports reflect a broader concern that, while important, falls outside the specific scope of the present case-file. As noted in our 2024 progress report, the complainant appears to raise a range of issues that are not directly connected to the original complaint, which may indicate a lack of substantive grounds related to the current case. In addition to this the case file falls outside of scope of the Bern Convention as the project area falls outside Emerald Network and the complainant has not justified in scientific means how this HPP will have a negative effect on sturgeons which have other barriers in the lower bank of the Rioni river;

As for the study<sup>1</sup> referenced by the complainant, please be informed that the study showed significant differentiation between wild and commercial Russian sturgeon populations and highlighted the potential for wild-caught individuals to be present in coastal markets in Georgia, however it has not been approved when and from which origin they appeared in the market. The analyses of mitochondrial haplotypes also suggested that commercial markets may contain sturgeon species that are not native to the region. Illegal capture of the wild population sturgeon species constitutes a criminal offense under Georgian legislation. Therefore, it is highly likely that sturgeons caught many years ago may have entered aquaculture systems and subsequently appeared in fish markets.

This assumption is supported by recent information from the Environmental Supervision Department, which reports that since 2021, no illegal activities or violations by aquaculture facilities have been registered. The Department conducts both scheduled annual inspections and random checks of aquaculture operations and fish markets.

I would also like to update the Bureau on the arrangement of a fish pass at the Vartsikhe HPP, as outlined in the Ministry's 2022 progress report (Letter No. 1870/01). According to a clarification submitted by the company on February 19, 2025, the construction of the fishway facility was to be implemented through investment financing, which could not be realized due to a severe financial crisis faced by the financing company. In light of the situation, the company requested an extension of the deadline for constructing the fish-pass facility until 2027. Current national legislation does not provide for the extension of deadlines set by an environmental decision; thus, National Environmental Agency informed the company about this limitation and also informed the Environmental Supervision Department about current status of the case.

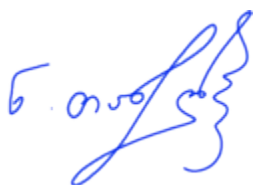
Court proceedings concerning Environmental Decision N2-191 are ongoing. Although the complaint has been received, a hearing has not yet taken place due to the current status of the planned Namakhvani HPP project.

Please consider, that due to recent developments, the construction of the "Namakhvani HPP" has been suspended, and the parties are currently engaged in arbitration proceedings where Enka Renewables filed a payment against the Government of Georgia at the International Chamber of Commerce.

In light of the current status of the case-file, we respectfully submit that there is no justification for keeping it open. We kindly urge the Bureau to reconsider both our latest and previous reports, which demonstrate the substantial efforts undertaken and confirm that the matter falls outside the current scope of the Convention. We therefore request the closure of the case-file, in order to ensure that the Convention's mandate remains focused and within its defined scope.

Sincerely,

First Deputy Minister Nino Tandilashvili



<https://edocument.ge/mea/public/5676-01-2-202507231246>



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<sup>1</sup> [Genetic Evidence for the Presence of Wild-Caught Sturgeons in Commercial Markets in Georgia](#)