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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
7-9 April 2026
Strasbourg

Complaint on Stand-by: 2022/4

**Hydropower plant development on Emerald Network site
Komarnica (ME000000P) (Montenegro)**

- REPORT BY THE COMPLAINANT -

*Document prepared by NGO Montenegrin
Ecologists Society*

Update Report – February 2026

Mr. Mikaël Poutiers - Secretary of the Bern Convention

Mr. Marc Hory - Project Manager

Mr. Michaël Nguyen - Administrative and Project Manager

Subject: Complaint No. 2022/04: Hydropower plant development on Emerald Network site Komarnica (ME000000P)

DEAR MR. POUTIERS,

DEAR MR. HORY,

DEAR MR. NGUYEN,

We respectfully submit an updated statement from the complainants regarding Complaint No. 2022/04 concerning the proposed development of the Komarnica hydropower plant (HPP) on the Emerald Network site ME000000P.

Since our last communication, several critical developments have taken place at the national level, which, unfortunately, further underscore the systemic undermining of environmental protection, legal standards, and scientific expertise in Montenegro.

1. Procedural Status of the Environmental Impact Assessment (EIA)

Since the complainants' last detailed submission (July 2025), no new formal administrative or legislative decisions have been adopted directly concerning the Komarnica hydropower project.

Following the withdrawal of the project proponent, Elektroprivreda Crne Gore (EPCG), from the Environmental Impact Assessment (EIA) procedure, no further procedural steps, approvals, or permitting decisions have been issued. The EIA procedure has not been formally concluded through a rejection decision; however, no additional official actions have been recorded to date.

2. The National Energy and Climate Plan (NEKP) of Montenegro was formally adopted by the Government of Montenegro on **10 December 2025** as the country's overarching strategy for energy and climate policy up to **2030**, setting targets for emissions reduction, renewable energy share, and energy efficiency¹. Within the investment and recovery planning framework referenced in the Plan, in the renewable energy chapter, a flagship project is described as the expansion of the Piva hydropower system through the construction of the *Komarnica hydropower*

¹ <https://www.gov.me/clanak/nacionalni-energetski-i-klimatski-plan-crne-gore>

plant. The document notes that in 2020 the Government granted EPCG a concession act for the construction of a plant with an installed capacity of 172 MW and expected annual generation of up to 213 GWh. At the same time, the Plan acknowledges that significant environmental challenges have been identified in relation to this project, substantially complicating its implementation. For this reason, and in order to increase power system flexibility and enable a higher level of renewable energy integration, priority is indicated for the Kruševo hydropower project, with currently indicated parameters of approximately 82 MW installed capacity and estimated annual generation of about 170 GWh, although technical documentation remains under preparation.

The complainants **note with concern** that the remaining part of the Piva Canyon is also designated as an **Emerald Network site (ME000000N)**. In this context, the continued strategic positioning of large hydropower expansion in these basins indicates a potential conflict between national energy development planning and the conservation objectives of the Bern Convention, particularly given that multiple Emerald sites and candidate sites in Montenegro are currently subject to development pressures.

3. Broader Energy Policy Context

3.1. In November 2025, Montenegro signed a bilateral energy cooperation agreement with the United Arab Emirates focused on the development of renewable energy and large-scale energy infrastructure projects²; while the agreement does not specifically mention the HPP Komarnica project, the complainants note that such strategic frameworks may increase future investment interest and development pressure in hydropower-suitable river basins, including environmentally sensitive areas, especially Emerald sites.

While no official documents link these initiatives directly to the HPP Komarnica project, the complainants note that such policy directions may increase future pressure for hydropower development in sensitive river basins, including the Komarnica/Piva area.

3.2. A draft Law on Strategic Investments was prepared and subject to public consultation, but it has not yet been formally adopted or submitted to the Parliament of Montenegro; responsibility for further development of the draft has recently been transferred to the *Ministry of Public Works*, which is reviewing public comments and documentation before initiating the next procedural steps.³ In the context of hydropower projects, the Draft Law on Strategic Investments introduces fast-track

² <https://www.gov.me/clanak/vlade-crne-gore-i-ujedinjenih-arapskih-emirata-potpisale-su-sporazum-o-saradnji>

³ <https://www.vijesti.me/vijesti/ekonomija/786089/najprije-usaglasavanje-sa-ek-pa-usvajanje-ministarstvo-javnih-radova-preuzelo-izradu-zakona-o-strateskim-investicijama>

procedures and public-interest designation for large infrastructure projects, which could reduce the level of environmental scrutiny and public participation safeguards for developments affecting sensitive Emerald Network sites.

3.3. In the broader energy sector, several developments have occurred that reflect Montenegro's evolving energy landscape. **A new Renewable Energy Sources Association (RES Montenegro) was established in January 2026 with support from EBRD and the EU** to facilitate investment and dialogue on renewable projects⁴.

3.4. Montenegro anticipates the commissioning of new renewable capacity such as the Gvozd wind power project in 2026 and is projected to move from energy deficit to surplus due to increased renewable production. A recent national study also indicates over 16 GW of low-conflict solar and wind potential, highlighting opportunities for sustainable energy expansion while respecting environmental and social criteria.

4. CSOs developments since the last update

Civil society organizations involved in the complaint have continued regular monitoring, advocacy, and public awareness activities related to the Komarnica canyon and the Emerald Network site.

Key activities include:

- continued public information and advocacy campaigns for the protection of the Komarnica canyon;
- release and public screenings of a documentary film addressing the ecological value of the canyon and the risks associated with the planned hydropower development, with additional screenings planned in Montenegro and other European countries;
- meetings and consultations with high-level decision-makers and institutional representatives, as well as with officials from the European Commission's DG CLIMA, as well as Desk Officer for Chapter 27, where the Komarnica case, associated biodiversity risks, and the broader status and development pressures affecting multiple **candidate Emerald sites in Montenegro were discussed as matters of priority**;
- the launch of an international petition opposing the Komarnica hydropower project.

⁴ <https://www.vijesti.me/vijesti/ekonomija/793552/crna-gora-pokrece-udruzenje-za-obnovljive-izvore-energije-uz-podrsku-ebrd-a-i-eu>

These activities demonstrate continued public, scientific, and expert attention to the case. The complainants will continue to monitor all administrative, legal, and planning developments related to the Komarnica hydropower project and Emerald candidate sites. Any concrete procedural or regulatory changes will be promptly communicated to the Secretariat.

In light of the current situation, including the unresolved status of the EIA procedure, the continued inclusion of the Komarnica hydropower project in national strategic energy planning documents, and the ongoing scientific and expert concerns regarding potential impacts on Emerald Network sites the complainants **respectfully invite the Bureau to continue its close consideration of this case.**

Given the absence of formal closure of the procedure and the persistence of planning-level support for the project, we kindly reiterate our request that the Bureau consider advancing the case to “**Possible File**” status, placing it on the agenda of an upcoming Standing Committee meeting, and exploring coordination with **UNESCO and IUCN** regarding the protection framework and possible extension of safeguards related to the Durmitor World Heritage area.

The complainants remain available to provide any further clarification or documentation that may assist the Bureau in its assessment.

Sincerely,
Andrijana Mićanović

On behalf of: NGO Montenegrin Ecologists Society, NGO KOD and NGO Društvo mladih ekologa Nikšić