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AND NATURAL HABITATS

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**Alleged threat to habitat and protected species from the
'Upper Horizons' Hydropower Project (Bosnia &
Herzegovina)**

- COMPLAINANT REPORT -

*Document prepared by
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Ms. Alessandra Siino - Secretary of the Bern Convention
Ms. Marta Medlinska - Programme Manager

May 2026 report by the complainants:
Complaint No. 2024/05: Bosnia and Herzegovina: Alleged threat to habitat and protected species from the 'Upper Horizons' Hydropower Project

DEAR MS. SIINO,
DEAR MS. MEDLINSKA,

As requested by the September 2025 Bureau meeting of the Bern Convention, hereby we send you an update report by the complainants relevant to the case 2024/05. The [Upper Horizons hydropower system](#) is planned to be built in the karst fields (*poljes*) of the Republika Srpska entity of Bosnia and Herzegovina, transferring water from the Neretva river basin to the Trebišnjica via three planned hydropower plants and a series of tunnels, reservoirs and channels. Consequently, [Recommendation No. 217 \(2022\) of the Standing Committee](#), adopted on 2nd December 2022, on the possible negative impact of hydropower plant development on the Neretva River (Bosnia and Herzegovina) is also valid for this system and especially the following point of the Recommendation:

“13. Implement a ban on development of further hydropower plants in the candidate Emerald Network site BA0000002 and all other candidate Emerald sites in the Neretva River basin (BA0000001, BA0000002, BA0000003, BA0000004, BA0000005, BA0000006, BA0000007, BA0000008, BA0000012, BA0000023, BA0000024 and BA0000025)”.

The last three Emerald sites in the list (Fatnicko polje, Dabarsko polje and Nevesinjsko polje) are currently being devastated by the Upper Horizons project.

In April-May 2026, important new information appeared in the media and the complainants visited the regions under threat, proving that it is the right time to rethink the complex. We provide all the important updates so the Bureau can make a well-informed decision.

Obstacles pile up for the Dabar hydropower plant

When the Republika Srpska authorities signed contracts with the [China Eximbank to finance](#) the Dabar hydropower plant at the end of 2021, it seemed like the first and largest part of the Upper Horizons complex was a done deal. Today, more than four years later, obstacles are piling up for this controversial project, providing a much-needed opportunity to rethink the whole idea.

The 160 megawatt (MW) Dabar hydropower plant, which would be the middle one in the system, is currently under construction by China's Gezhouba Group, with well-connected local companies Integral Inženjering and Elnost as sub-contractors. The lowest of the three hydropower plants, Bileća (32 MW), is at a much earlier stage, having had its environmental impact assessment approved in December 2025. The uppermost plant, Nevesinje (60 MW) would be the last one, and no concession has been issued for it yet.



Works on the Dabar hydropower plant have been reduced to a minimum in May 2026. © CEE Bankwatch Network

In early May it was [reported](#) that as early as August last year, China Eximbank stopped disbursing funds for the Dabar hydropower plant and that Gezhouba had withdrawn most of its workers, only keeping up minimum maintenance on the building site. The main problem, according to the media, was the non-completion of the diversion tunnel, which was a condition for the disbursement of the next instalment from the bank. The [Center for Environment](#) is currently challenging at the Supreme Court the refusal to provide details of the Eximbank loan to the entity-owned utility Elektroprivreda Republika Srpska (ERS).

Additionally, the Eximbank loan doesn't cover the whole amount needed. The contract with Gezhouba [reportedly](#) costs around EUR 224 million, with the roughly EUR 34 million not covered by the loan to come from ERS' own funds. The diversion tunnel was also reportedly built from ERS' own funds, amounting to [around EUR 60 million](#) by late 2025.

Another expense reportedly being borne by Republika Srpska is land expropriation. The process has been going on for several years in Nevesinjsko polje, but is far from complete. Since 2023 we've made successive visits to the area, but the situation remains as mixed as it was then. Some land owners, particularly those not living locally, received offers and agreed to sell it. Others challenged the expropriation in court – either due to the low prices offered or rejecting it altogether. Some have not received any expropriation papers at all, despite their land obviously being in the area to be flooded by the reservoir. What was new during our recent visit was mentions of delays with payment. In April 2026 it was also [reported](#) that ERS was

planning to borrow EUR 25 million more, among others to pay for expropriation. But it remains to be seen whether this will be enough to ensure the project's continuation.

Devastating, wide-ranging impacts on people and biodiversity

The system's impacts would be devastating, not only in Republika Srpska but also in the Federation of Bosnia and Herzegovina and in the Neretva delta in Croatia. The Dabar hydropower plant would drown the most fertile agricultural area of Nevesinjsko polje (**Nevesinjsko polje candidate Emerald site BA0000025**) in Republika Srpska, while the whole complex would disrupt underground water flows and cave systems, whose [unique flora and fauna](#) – including several species of fish called *Gaovica* and found nowhere else in the world – depend on annual flooding and dry periods to complete their lifecycle. A planned channel across Dabarsko polje would partly drain the field (**Dabarsko polje candidate Emerald site BA0000024**) and further impact Fatnicko polje (**Fatnicko polje candidate Emerald site BA0000023**), disrupting their [well-preserved biodiversity](#).



The Dabarsko polje wet meadows would be dried up if the Dabar hydropower plant is completed. ©

Bruno D'Amicis

The most important results of the research at Dabarsko and Fatnicko poljes are the following:

- 231 taxa of vascular plants determined to the subspecies level are registered, of which two taxa are endemic to the Balkan Peninsula, while 12 taxa are under strict protection and 25 taxa are protected in RS. Two taxa are on Annex II of the European Habitats Directive (*Eleocharis carniolica* W. D. J. Koch and *Scilla litardierei* Breistr.), and the same number on Annex II of the CITES Convention;

This unique area represents one of the most important and richest areas for dragonflies in Bosnia and Herzegovina. 43 species of these insects have been registered in this area, more than two thirds of the species present in Bosnia and Herzegovina. From the conservation point of view, the most important species are

Coenagrion ornatum and *Sympetrum flaveolum*, the first species is protected by the Habitats Directive of the European Union, while the second is an endangered (EN) species according to the Red List of Dragonflies of Europe. In addition, 35 species are on the Red List of the Republic of Srpska.

- The research of the bird fauna in the Dabar and Fatničko fields in just a few days of research revealed the presence of at least 95 different bird species, among which a significant number of species are under permanent protection.
- The results show that in the watercourses in the area of Dabarsko polje, there are Gacko gaovica (*Telestes metohensis*) and Dabarska gaovica (*Telestes dabar*), while in the area of Fatničko field individuals of Trebinjska gaovica (*Delminichthys ghetaldii*) are established. All the listed species of gaovice represent endemic species and a significant genetic resource. Data on the biology of these species is of particular importance because they are endemic species of narrow range, whose habitat is being radically changed by anthropogenic influence.
- During the research of the cave systems in these fields, the most significant find was from the Radovića cave, in which, according to estimates, there were over 1000 bats. By quick observation, we noted the presence of at least four species of bats: *Rhinolophus hipposideros*, *Rhinolophus ferrumequinum/euryale*, *Miniopterus schreibersii*, *Myotis myotis/blythii*. Also, the presence of 17 troglobitic, 7 aquatic and 10 terrestrial species has been confirmed in the cave systems so far.

Attempting to retain water in Republika Srpska's karst fields would also lead to decreased underground water flows to the Buna, Bunica and Bregava rivers in the Federation of Bosnia and Herzegovina. These are not only highly attractive tourist destinations and sources of water for local people, but are also [highly biodiverse](#). The Buna, for example, is a key site for the softmouth trout, considered [vulnerable](#) by the IUCN.



The endemic fish of Neretva river would be significantly impacted if water is diverted from Neretva to Trebišnjica basin. © Bruno D'Amicis

The Buna, Bunica and Bregava are key tributaries of the river Neretva, whose delta downstream in Croatia is an important agricultural area, especially for growing citrus fruits. It is a key site of the EU Natura 2000 network (**Delta Neretve Natura 2000 site HR5000031**), has several ornithological reserves, and is protected under the Ramsar Convention. The delta has already been suffering from salination in recent years, as a result of reduced flow in the Neretva during drier periods. Diverting part of the Neretva's flow to the Trebišnjica, as the Upper Horizons complex plans to do, would exacerbate this issue even further, denying people in the delta their livelihoods.

Republika Srpska keeps renewing Dabar's environmental permits on the basis of an outdated and inadequate environmental impact assessment study from 2012, denying the public any chance to have a say in the intervening 13 years. After the Aarhus Center in Sarajevo managed to successfully challenge some of the project's construction permits in court, the authorities just reissued them again, without addressing the deficiencies that led to the legal challenges.

Building in Swiss cheese

The authorities and construction companies cannot control the vagaries of the karst terrain where the project is planned. Building tunnels and reservoirs in karst is [never a simple matter](#). You never know when you will disrupt an underground water flow or drill into a cave in this Swiss-cheese-like terrain. Holding water in a reservoir of over nine square kilometres – equal to 1266 football fields – in Nevesinjsko polje for the Dabar plant may prove to be mission impossible.

A [particularly illustrative incident](#) happened in 1964 on the Fatničko polje, at the Obod estavelle – a formation which functions both as a spring and as a sinkhole, depending on the season. An attempt was made to block the estavelle with concrete. Shortly afterwards, heavy rainfall resulted in springs appearing more than 100 metres above the plugged hole, endangering two villages. The concrete was destroyed with explosives and the previous water flows restored.

The issues caused by Upper Horizons so far have been smaller-scale, but fatal. The construction of the 12-kilometre diversion tunnel from Nevesinjsko to Dabarsko polje, saw large-scale [rockfalls](#) in cavernous zones. In 2022, a [worker died and two more were injured](#) during a collapse.

The drilling of the tunnel [began](#) in September 2016, and was carried out by Integral Inženjering. It was [expected](#) to take four and a half years, but so far it has taken almost ten. The actual drilling was completed in October 2025, but the concrete lining is still being completed. In July 2025, the village of Berkovići and other nearby villages were also [left without drinking water](#) from the Vrijeka spring for several days after damage by works on the Dabar powerhouse.

With complaints to several international conventions pending, not too late for a rethink

Republika Srpska's authorities have [admitted](#) that the works on Dabar have slowed down and some financial issues need to be resolved. But they clearly believe this will happen. The question is whether it should. The works so far have cut hideous scars into the landscape and used vast amounts of concrete and energy. But the main impacts of the Upper Horizons

complex would occur only when the reservoirs are filled and the plants start operating. This can still be prevented even for Dabar, and certainly for Bileća and Nevesinje, which are at a much earlier stage.

More challenges to the Upper Horizons complex are pending. In addition to the two Bern Convention complaints, in February the Croatian authorities announced they had [submitted a complaint](#) to the Espoo Convention on environmental impact assessment in a transboundary context. More such complaints can be expected as the complex progresses.

Every delay costs money, and just because money has already been spent, that doesn't mean Republika Srpska should keep digging. Dabar's capacity of 160 MW might sound impressive, but its expected electricity generation would only be 251 gigawatt hours per year. This is only twice as much as the modestly-sized Hrgud wind farm currently planned in Republika Srpska. And in reality, due to climate change, we expect even less.

It's not too late for Republika Srpska to cut its losses and pursue less damaging energy projects, and it should do exactly that.

LEGAL FIGHT: Upper horizons

- The Aarhus Center in Bosnia and Herzegovina (abbreviated ACSA) and the Center for the Environment (abbreviated CZZS) tried to point out to the competent institutions that the Upper Horizons (locally: Gornji horizonti) project will have incalculable consequences for the environment, especially in a cumulative combination with already built and planned projects in the area of the Neretva River, where the construction of the HPP "Ulog" (35 MW) is completed, the construction of which in the summer of 2024 caused a terrible fish kill and a large clouding of the famous emerald green colors of the river Neretva. Another turbidity and fish die-off occurred in 2025, when HPP Ulog started operating. However, the competent institutions have ignored our appeals, as well as the formal recommendation of the Bern Convention Secretariat, which ordered the suspension of these projects in BiH, given that the Neretva River and its tributaries are largely planned for protection within Natura 2000.

Environmental permit for HPP "Dabar"

- In June 2023, ACSA filed a lawsuit against the issuance of a renewed environmental permit for HPP "Dabar". The local, District Court in Banja Luka dismissed this lawsuit. For this reason, ACSA filed a request for extraordinary review of the judgment with the Supreme Court of RS in June 2024. The epilogue, or decision, of the Supreme Court of RS regarding this request is still awaited. Namely, the main argument of the District Court in Banja Luka in rejecting the lawsuit is that ACSA should have been included in the process of commenting on the Decision on the Environmental Permit during 2011 and 2012, although ACSA provided clear evidence that it did not exist as an Association during that period, and that it could only have been included in the process of commenting on the renewal of the environmental permit subsequently, when it learned about the project from the locals. The Supreme Court of RS rejected the request of the Aarhus Center in BiH by its ruling in February 2026. For this reason, the Aarhus Center in BiH, on May 8, 2026, filed an appeal with the Constitutional Court of BiH.

Five (5) construction permits for the Dabar HPP

- In the meantime, after almost two years of attempts to formally obtain construction permits, ACSA and CZZS finally obtained them, and both associations individually sued all five construction permits related to the construction of the Dabar HPP. In relation to the four lawsuits, the local, district court decided to merge the case into one, i.e. to merge the individual lawsuits of ACSA and CZZS into one court proceeding.
- During the months of August and September 2024, the District Court in Banja Luka upheld three (3) lawsuits of ACSA and one lawsuit of CZZS, by annulling: 1. the construction permit for the construction of an underground tunnel for the HPP "Dabar", 2. the construction permit for a 240 kV transmission line, and 3. the construction permit for an access road for the HPP "Dabar".
- In relation to the other two lawsuits of ACSA and CZZS for construction permits, namely: 4. for the machine building and distribution facility for the HPP "Dabar" and 5. the construction permit for the construction of the dams: "Pošće" with the embankments "Grebak" and "Vranjača", they were rejected as unlawful and untimely by the District Court in Banja Luka. For this reason, ACSA filed a request for extraordinary review of these judgments with the Supreme Court of the RS. The judgments of the Supreme Court of the RS are currently pending.
- During September 2024, the Ministry of Spatial Planning, Construction and Ecology (MPUIGE) issued new construction permits for the construction of an underground tunnel for the "Dabar" HPP, and a construction permit for a 240 kV transmission line for the "Dabar" HPP. ACSA sued both newly issued construction permits. And in relation to the judgment of the District Court in Banja Luka, which annulled the construction permit for the access road for the "Dabar" HPP, MPUIGE filed a request for extraordinary review of the court judgment before the Supreme Court of the RS. ACSA submitted a response to this request.
- In early 2025, the District Court in Banja Luka issued a ruling dismissing ACSA's lawsuit in relation to the re-challenged decision for the issued construction permit for a 240kV transmission line. For this reason, ACSA filed a request for extraordinary review of the judgment with the Supreme Court of the RS in February 2025.
- In May 2025, the District Court in Banja Luka issued a judgment dismissing the Aarhus Center's lawsuit regarding the construction permit to an interested party for the construction project of the HPP "Dabar" in the Zalomka River Basin, specifically for the construction of the supply tunnel (length 12,125.0 m), the entrance structure (dimensions: 29.50x8.00 m and height 31.50 m), and the access tunnel "Straževica" (length 651.57 m), which represent a separate technical unit and also constitute integral parts of the HPP "Dabar", with an installed capacity of 159.15 MW, in the Zalomka River Basin. Following this judgment, the Aarhus Center in BiH filed a request for extraordinary review of the court decision with the Supreme Court of the RS. The judgment of this court is awaited.

HPP "Bileća"

At the end of 2023, ACSA submitted comments to the competent Ministry regarding the preliminary environmental impact assessment for the construction project of the Bileća hydroelectric power plant, with an installed capacity of 32 MW, on the Trebišnjica River, Municipality of Bileća, which is part of the Gornji Horizonti project. ACSA did not receive any responses to these submitted comments. In the meantime, the Environmental Impact Study for HPP "Bileća" was published for consultation with the interested public at the end of January 2025. ACSA submitted extensive comments on this Study. At the end of 2025, the

competent RS Ministry issued a decision approving the Study. For this reason, ACSA filed a lawsuit with the District Court in Banja Luka in January 2026.

Taking into account all the new information, we call on the Bern Convention Bureau to:

- 1. Request from the authorities to halt the construction of all three hydropower plants of Upper Horizons until an independent, peer-reviewed scientific assessment of ecological impacts, including transboundary effects is completed, public participation in permitting is ensured and dialogue between complainants, stakeholders, Republika Srpska authorities, BiH federal institutions, and Croatia on water management and biodiversity protection has started.**
- 2. Coordinate with the focal point of Croatia at the Bern Convention possible solutions to avoid or mitigate the impacts on the Neretva Delta.**
- 3. Elevate the case to a possible file.**

Respectfully,

Delivered:
in BiH“
-subject;
-a/a.

• *Emina Veljović*



Executive director of the "Resource Aarhus Center

A handwritten signature in blue ink, consisting of stylized letters.