



Strasbourg, 1<sup>st</sup> February 2023

**T-PVS/Files(2023)11**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

43<sup>rd</sup> meeting  
Strasbourg, 28 November - 1 December 2023

**New complaint (pending): 2022/04**

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

**- COMPLAINANT REPORT -**

*Document prepared by  
NGO Montenegrin Ecologists Society, NGO KOD and NGO Društvo mladih ekologa Nikšić*

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Ms. Ursula Sticker - Secretary of the Bern Convention  
Mr. Marc Hory - Project Manager  
Mr. Eoghan Kelly - Project Assistant  
Ms. Helena Orsulic - Administrative Assistant  
Ms. Nadia Saporito – Project Officer

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

DEAR MS. STICKER,  
DEAR MR. KELLY,  
DEAR MR. HORY,  
DEAR MS. ORSULIC,  
DEAR MS. SAPORITO,

Hereby we send you an update by the complainants relevant to the Complaint No. 2022/04: Hydropower plant development on Emerald Network site Komarnica (ME000000P).

As the [government confirmed in its report from July 2022](#), the EIA procedure is ongoing and in May 2022, the EIA report ('Elaborat') was returned to the promoter, who has up to 855 days to eliminate the deficiencies. The promoter can still submit an updated report anytime and get approval soon.

In June, the Committee on Foreign Affairs of the European Parliament voted on its resolution on the 2021 [Commission Report on Montenegro](#) in which it “*expresses concern about damage to bodies of water and rivers related to infrastructure projects, including Lake Skadar, Sinjajevina, **Komarnica** and others*” and “*calls on Montenegro to increase its efforts to cut its electricity distribution network losses, to diversify its renewable sources and **reduce its reliance on climate-vulnerable hydropower generation***”.

Disregarding these calls, the government continues to push for the construction of Komarnica project and even more, the state-owned power utility (EPCG) launched a tender for study on the hydropower potential of the Piva river downstream from the Piva hydropower plant to examine the [possibility to build the Kruševo hydropower plant](#). As Kruševo is planned on the same river system as Komarnica both plants would have significant cumulative impacts, especially on species that inhabit both river stretches.

The [Montenegrin government requested funds for the Komarnica hydropower project](#) as a Flagship under the EU Economic and Investment Plan. However, the European Commission confirmed to CEE Bankwatch Network in June 2022 that [none of the greenfield hydropower projects proposed have been endorsed for funding](#) within the Western Balkans Investment Framework (WBIF).

On 24 June 2022, [the government signed the concession contract with EPCG](#) for the construction of Komarnica hydropower plant and production of electricity. The concession was granted for 30 years and would be implemented in three phases. The first phase lasts 30 months and includes the preparation of technical documentation; the second is 60 additional months and includes the construction of the plant;

while the third phase includes the techno-economic use of hydropower potential for electricity production.

On 15 July 2022, we received an answer from Lazare Eloundou Assomo, Director of the UNESCO World Heritage Centre, stating that he has taken due note of our concerns regarding the possible implications of the Komarnica project on the Durmitor National Park World Heritage site. Our concerns have been transmitted to the Montenegrin authorities for review and comments

2022 was characterised by political instability in Montenegro and [the government collapsed](#) after a non-confidence motion on 20 August. Afterwards, the websites of several ministries and public companies, including the state-owned power utility EPCG, were [hit by cyber-attacks](#) and many of the decisions regarding Komarnica were unavailable for the public for many months.

In January 2023 we found out that Montenegro has included plans for hydropower development in its [state budget for 2023](#):

1. Technical documentation (feasibility studies, preliminary and main project documents) for the Komarnica, Piva II and Kruševo plants.
2. Intentions in the coming years to provide loan guarantees totalling up to EUR 1.2 billion for the construction of those three plants plus the Boka and Sutrin hydropower plants.

The concept of [Spatial Plan for Montenegro until 2040](#) also includes the construction of the Komarnica plant, as well as two more hydropower plants (Boka and Kruševo) and a new turbine on the existing Perućica plant. The concept is open for comments until February 2023.

Mr Vuk Iković  
Montenegrin Ecologists Society  
Martinići bb,  
81410 Danilovgrad  
Montenegro

15 July 2022

**Culture Sector**  
**World Heritage Centre**

Ref: CLT/WHC/EUR/22/13881

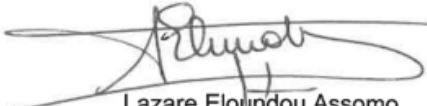
Dear Sir,

I wish to thank you for your correspondence dated 17 March last, concerning the development project of the Komarnica hydropower plant in the vicinity of the World Heritage property 'Durmitor National Park'.

Please rest assured that I have taken due note of the concerns of the Montenegrin Ecologists Society regarding the state of conservation of this World Heritage property. In accordance with Paragraph 174 of the Operational Guidelines for the Implementation of the World Heritage Convention, the information you kindly provided has been transmitted to the relevant Montenegrin authorities for review and comments.

I appreciate your organisation's commitment towards the conservation of the World Heritage property 'Durmitor National Park' and thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,



Lazare Eloundou Assomo  
Director

*Prostorni plan Crne Gore do 2040.g. – Koncept plana*

## **Energetski objekti**

### **Nove elektrane koje su predložene u Konceptu plana:**

*(Tehnički podaci o instalisanoj snazi objekata i očekivanoj godišnjoj proizvodnji su preuzeti iz strateških dokumenata, razvojnih planova energetske subjekata i resornog ministarstva. Ovdje se navode radi transparentnog praćenja odabranih indikatora realizacije predloženih scenarija razvoja).*

- **Hidroelektrane:**
  - HE Perućica – Agregat A8:
    - Instalirana snaga: 58,5 MW
    - Planirana proizvodnja: 50 GWh
    - Priključak: 110 kV (220 kV)
    - Lokacija: Nikšić
  - HE Komarnica:
    - Instalirana snaga: 171,9 MW
    - Planirana proizvodnja: 213 GWh
    - Priključak: 110 kV
    - Lokacija: Šavnik, Plužine
  - HE Boka:
    - Instalirana snaga: 290 MW
    - Planirana proizvodnja: 670 GWh
    - Priključak: 220 kV
    - Lokacija: Risan
  - HE Kruševo:
    - Instalirana snaga: 90-120 MW
    - Planirana proizvodnja: 235 GWh
    - Priključak: 220 kV
    - Lokacija: Plužine

Taking into account the dynamic situation in Montenegro, the continuous efforts by the government to ensure the necessary documentation and funding for the construction of Komarnica hydropower plant and other plants in the Komarnica/Piva basin, the lack of progress in compensating for the impacts on the UNESCO World Heritage property, and the government's disregard to the recommendations of the European Parliament we ask the Bureau to put the complaint in the agenda of the 2023 autumn Bureau meeting and consider elevating it to a possible file.

Best regards,

Vuk Iković



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

NGO KOD and