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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

40<sup>th</sup> meeting  
Strasbourg, 1-4 December 2020

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**Complaints on stand-by**

**Possible threat to Svaneti 1 Candidate Emerald  
site from Nenskra HPP (Georgia)**

**- REPORT BY THE COMPLAINANT -**

*Document prepared by  
Green Alternative and Balkani Wildlife Society*

Mr. Eoghan Kelly - Assistant of the Bern Convention  
Mr. Marc Hory - Project Manager - European Diploma for Protected Areas and Emerald Network  
Ms. Véronique De Cussac - Administrative Assistant

**Subject: Complaint No. 2016/9 - Possible threat to “Svaneti 1” Candidate Emerald Site (GE0000012) from Nenskra Hydro Power Plant development (Georgia).**

DEAR MR KELLY,  
DEAR MR HORY,  
DEAR MS DE CUSSAC,

Hereby we send you an update by the complainant relevant to the Complaint No. 2016/9 - Possible threat to “Svaneti 1” Candidate Emerald Site (GE0000012).

**Concerned about continuing reduction of areas from the Emerald Network and the lack of protection of large rivers, aware of the lack of strategic planning for hydropower development in Georgia, aware of the insufficient quality of the three newly proposed "compensation" sites, we call for an on-the-spot assessment to Svaneti and updating the complaint status to possible file.**

During the 39th Standing Committee meeting in December 2019 a list of 46 Emerald sites in Georgia were included in the Updated list of officially nominated candidate Emerald sites<sup>1</sup>. We understand this is an important step towards the protection of some habitats and species in the country, but also noted some major problems. The "Svaneti 1" site (GE0000012) was adopted with a reduced area of 37390 ha, compared to the initial area as adopted at the Biogeographical Seminar held between 27th and 29th of May 2015. Since 2016 the Georgian Government **disregards procedures for evaluation of sufficiency of proposed ASCIs as adopted by the Standing Committee in 2013 (T-PVS/PA (2013) 13)** and excluded from the Emerald Site GE0000012 "Svaneti 1" all territories part of Nenskra Hydro Power Plant.

Furthermore during the 39th Standing Committee meeting the Georgian Government pushed to exclude 12 proposed sites from the list of officially nominated candidate Emerald sites<sup>2</sup> and thus **violated Recommendation 157 (2011)** which says countries shall “*nominate as Emerald Network candidate sites all proposed sites which have been evaluated at biogeographical level and confirmed as meeting the criteria defined in Appendix I.*”

One of the main reasons behind this decision of the Government is the construction of the Shuakhevi Hydropower Project, located in the "Goderdzi" Emerald site (GE0000026). The Project already impacted the upper part of Adjaristsqali river, Skhalta river and Chirukhistaqali river. No appropriate assessment was done to the impact of the Project over the Emerald Network (See report on environmental problems of Shuakhevi Hydro Power Plant, Adjara, Georgia: <https://bit.ly/3bVkl3y>). Two more hydropower projects are planned in the Adjaristsqali river system. Another Emerald site - Alazani (GE0000022) was not officially nominated as candidate. We are very concerned that new territories with river and riparian habitats will be excluded from the Emerald Network. Thus

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<sup>1</sup> <https://rm.coe.int/updated-list-of-officially-adopted-emerald-sites-december-2019-/168098ef51>

<sup>2</sup> <https://rm.coe.int/updated-list-of-officially-nominated-candidate-emerald-sites-december-/168098ef50>

sufficiency in the protection of river and riparian habitats and species will never be met and adverse impacts on the coherence of the Emerald network as a whole will not be avoided.

By excluding the rivers Enguri and Nenskra in Svaneti, not protecting parts of the Adjaristsqali River system and Alazani River and refusing to propose sites on other big rivers (Rioni for example) the Georgian Government **violates Recommendation No. 16 (1989)** of the Standing Committee on areas of special conservation interest. The Government doesn't *"take steps to designate areas of special conservation interest to ensure that necessary and appropriate conservation measures are taken for each area situated within their territory or under their responsibility where that area fits one or several of the following conditions:*

*a. it contributes substantially to the survival of threatened species, endemic species, or any species listed in Appendices I and II of the convention;*

(...)

*c. it contains an important and/or representative sample of endangered habitat types;*

*d. it contains an outstanding example of a particular habitat type or a mosaic of different habitat types;*

(...)

*f. it otherwise contributes substantially to the achievement of the objectives of the convention".*

During the Biogeographical Seminar held in Tbilisi in November 2017 experts agreed that the reduction of the Emerald sites "Svaneti" and "Racha" in the Western Great Caucasus has led to insufficient protection of 7 species and 15 habitats in the Alpine region of Georgia.

The so-called "three compensation sites" proposed by the Government cannot improve the situation much and when there is a new Biogeographical Seminar on the Emerald Network in Georgia many natural habitats and species will remain with **Insufficient Moderate** assessment. The final conclusions of the Biogeographical Seminar held in Tbilisi in November 2017 show that out of 81 conclusions for these species and habitats in the 3 regions of Georgia 41% are 'scientific reserve', 36% are 'insufficient major' or 'insufficient moderate' and only 23% are 'sufficient' or 'insufficient minor'.

We would like to point out once again data about the uniqueness of Nenskra and Nakra valleys excluded from "Svaneti 1" site:

1. The upper part of Nenskra and Nakra valleys (with Nenskra Dam and Nakra Weir locations) were included in the strict nature protection zone of **Upper Svaneti National Park** as it was planned for declaration in 2008 (see map in Annex 1). According to the Draft Management Plan Svaneti Protected Areas (Annex 2): *"The following ecosystem components , shown on Figure 3.4 , are typical for the forest belt:*

*III-2 upper forest and sub-alpine belt ecosystems of the upper reaches of r. Nenskra;*

*III-3 forest ecosystems of r. Nakra;*

*III-4 forest ecosystems of r. Kasleti and Khaishura;*

*III-5 coniferous forest ecosystems of the northern slope of the Svaneti ridge."*

The Georgian Government didn't declare the national park for 10 years already and all the territory of Svaneti remains unprotected.

2. The Western Great Caucasus is the only place in temperate Eurasia with intact forests according to the **The Intact Forest Landscape (IFL)**<sup>3</sup> project, with a mapping team composed by Greenpeace, Global Forest Watch, Transparent World, The Global Land Analysis and Discovery (GLAD) laboratory in the Department of Geographical Sciences at the University of Maryland, WWF Russia, Luonto Liitto (Finnish Nature League) and Forest Watch Indonesia. The Nenskra and Nakra

<sup>3</sup> <http://www.intactforests.org/world.map.html>

valleys are an essential part of this area of intact forests (see map in Annex 3). According to the project: "*Intact Forest Landscape (IFL) is a seamless mosaic of forest and naturally treeless ecosystems within the zone of current forest extent, which exhibit no remotely detected signs of human activity or habitat fragmentation and is large enough to maintain all native biological diversity, including viable populations of wide-ranging species. IFLs have high conservation value and are critical for stabilizing terrestrial carbon storage, harboring biodiversity, regulating hydrological regimes, and providing other ecosystem functions.*"

3. In the book **Local Flora (Plant Life of Georgia)**, Batumi, 2000 the authors Revaz Gagnidze and Murman Davitadze highlight the importance of Nenskra and Nakra valleys as key areas in the floristic district of Svaneti. On page 43: "*Major part of the Floristic area of Svaneti is covered by dark coniferous forests. Forest with evergreen undergrowth is well preserved in Tkheish-Khumpreri and Nenskra-Nakra valleys.*" (Annex 4 in Georgian). Several species of endemic plants with very limited distribution are present in both valleys. On page 46: "*From Abkhazian limestone flora in Nenskra valley *Leptopus colchicus* is present, for alpine meadows *Pulsatilla aurea*, *Ranunculus lojkae*, etc.*". On page 47: "*Endemic species of Svaneti flora are: 1. *Cirsium albowianum* discovered by Italian scientists Sommier and Levier is spread in Nenskra and Tkheishi valleys.*"

4. The checklist of **Rare, Endangered and Vulnerable Plants of the Republic of Georgia**<sup>4</sup> includes 64 species of plants important for conservation in Svaneti, most of them endemic to the Caucasus or local endemics. This checklist was prepared by the Institute of Botany and the Botanical Garden of the Georgian Academy of Sciences in collaboration with the Missouri Botanical Garden and the authors Marina Eristavi, Tatyana Shulkina, Shalva Sikhuralidze and Lamara Asieshvili say "*Conservation International recently designated the Caucasus as one of its 25 global "biodiversity hotspots" because of the area's exceptional number of endemic species (those found nowhere else) and the high degree of threat to those species. The number of endemic vascular plant species in the Caucasus approaches 1600 (0.5% of the world's 300,000 plant species) and only ten percent of the region's natural vegetation remains. With destruction of habitats occurring at a critically rapid pace throughout the Caucasus (...)*". The Nenskra Hydro Power Project would add up to the destruction of habitats and important populations of endemic plants could be lost (flooding by the dam) or degraded (changes in microclimate conditions in gorges), but no detailed mapping or assessment of impacts was made before project approval.

We would like to show you drone footage from the Nenskra Dam site to illustrate the pure wilderness of the area:

1. Nenskra HPP project site towards end of reservoir - [https://youtu.be/mrRZ\\_UqxiII](https://youtu.be/mrRZ_UqxiII)
2. Nenskra HPP - towards Dam <https://youtu.be/QLnODufYW2E>
3. Nenskra HPP - footage from 500 metres - <https://youtu.be/sBJaGDJiREE>
4. Towards Dam - <https://youtu.be/AEg5O4Rrplw>
5. Nenskra HPP - Lower altitude flight over planned reservoir - <https://youtu.be/opsbcSlvCSQ>
6. Workers Camp - Downstream of Dam <https://youtu.be/WulxQerOHMU>
7. Nenskra Downstream - <https://youtu.be/Yh9eKoZEKVo>
8. Avalanches on right Bank Towards Dam <https://youtu.be/1t6aUpOKg6o>

Best regards,

Mr. David Chipashvili - Association Green Alternative – complainant  
Mr. Andrey Ralev - Balkani Wildlife Society - biodiversity expert

<sup>4</sup> <http://www.mobot.org/MOBOT/research/georgia/cfamily.shtml>