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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Bureau of the Standing Committee

18-19 March 2024
Strasbourg

Open File: 2020/9

**Possible negative impact of hydro-power plant
development on the Neretva River (Bosnia &
Herzegovina)**

- REPORT OF THE COMPLAINANTS -

*Document prepared by
Center for Environment (FoE Bosnia & Herzegovina), Aarhus Centre in Bosnia and Herzegovina,
RiverWatch, EuroNature, CEE Bankwatch Network, ClientEarth*

No: 61/24
Banja Luka, 7th February 2024

**Directorate General of Democracy
Council of Europe
Bern Convention
Avenue de l'Europe
F-67075 Strasbourg Cedex, France**

Attn.:

**Mr. Mikaël Poutiers - Secretary of the Bern Convention
Mr. Eoghan Kelly - Project Assistant of the Bern Convention
Mr. Marc Hory - Project Manager - European Diploma for Protected Areas and Emerald Network**

S U B J E C T : 4th Update report on Open File: 2020/9, Possible negative impact of hydro-power plant development on the Neretva River (Bosnia and Herzegovina)

Dear Mr. POUTIERS,
Dear Mr. KELLY,
Dear Mr. HORY,

Hereby we are submitting our fourth update report in regards to the case file No. 2020/9 (Possible negative impact of hydro-power plant development on the Neretva river, Bosnia and Herzegovina).

We would like to confirm that all of the points from our latest Update report, which was presented on 43rd meeting of the StC, are still relevant, and that to best of our knowledge **there has not been any progress in implementation of the Recommendations no. 217 (2022) since the StC meeting in December 2023.**

However, we would like to briefly summarise and update our latest inputs to the StC:

1. The construction of the HPP Ulog has not been halted (Recommendation no. 7). The **construction of HPP Ulog is near its finalisation**. Photos from HPP Ulog construction site(s), taken on 3rd February 2024 please find [here](#).
2. The **7 SHPPs** (total power of 15 MW) in the uppermost stream of the river (HES Upper Neretva - Phase I and II), **are still pending**. The Ministry of Energy and Mining, or the RS Government as the concession grantor, have not initiated any legal steps towards cancelation of these concessions, so no steps have been taken to implement Recommendation no 8. The request for access to information — for copies of Concession Agreements for 7 SHPPs — remains pending since September 2023, so the agreements are still undisclosed to the complainants, and thus for any possible legal review and action.
3. CfE's letter to the RS minister for environment from June 2023, with a proposal for a consultative meeting on the status of play in regards to ongoing protection procedure of the Upper Neretva area, remains **without any feedback from the ministers office** — so unfortunately there is still no dialogue or cooperation between complainants and this ministry.
4. To best of our knowledge, **projects located in the Federation** of Bosnia and Herzegovina (HPP Bjelimići and HPP Glavatičevo, and the Bjelimići pumped storage plant), remain dormant — but **still in place**. Federal Ministry for Environment and Tourism has, among others, invited CfE to a regular meeting which will be held in Sarajevo on 21st February, where hopefully these projects will be discussed as well.

5. Referring to point 13 of Recommendation no. 217 (2022), requesting Bosnia and Herzegovina to implement a ban on further development of hydropower plants in all candidate Emerald sites in the Neretva River basin — we would like to update you that the construction of the **Upper Horizons hydropower scheme** is still ongoing. Additionally, the RS Government identified HPP Dabar (160 MW), located in Dabarsko karst field Emerald site (BA0000024), as one of the **priority project** for public investments. The construction permits related to the HPP Dabar remain undisclosed to the complainants due to pending requests.
6. Finally, we are glad to update you that **findings from 2nd NSW** (Neretva Science Week), held in 2022 in Ulog village, Nevesinjsko polje and the nearby area, are now officially published [here](#).
7. Additionally, the **Preliminary Report from 3rd NSW**, held during May/June 2023, can be found [here](#).
8. Any further updates are expected on next **Inter-entity Body for Environmental Protection**, which should be held in Sarajevo in late February. The time and date of the meeting are still expected, as well as the invitation for the complainants.

Sincerely,

President



Tihomir Dakić

On behalf of the other Complainants:
Aarhus Center in Bosnia and Herzegovina
EuroNatur
RiverWatch
CEE Bankwatch Network
ClientEarth