Strasbourg, 9 March 2022 **T-PVS/Files(2022)37**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

42nd meeting
Strasbourg, 29 November - 2 December 2022

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New complaint: 2021/08

Possible threat to Rioni River from the Namakhvani Hydropower Project (Georgia)

- COMPLAINT FORM -

Document prepared by
Association Green Alternative, Nature Conservation Georgia, CEE Bankwatch Network

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Convention on the Conservation of European Wildlife and Natural Habitats

COMPLAINT FORM

Bern Convention Secretariat
Directorate of Democratic Participation
Council of Europe
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On behalf of (if applicable): Association Green Alternative, Nature Conservation Georgia, CEE Bankwatch Network
Web site: www.greenalt.org

Date: 24.10.2021 Signature:

1. Please state the reason of your complaint (refer also the Contracting Party/es involved and the Articles of the Convention which might be violated).

The Georgian Government violates Article 3, paragraph 1 and 2, Article 4, paragraphs 1, 2 and 3 of the Bern Convention by not protecting Rioni River and granting permits to build Namakhvani Hydropower Project. In February 2020 environmental consent for Lower Namakhvani HPP was issued, based on an EIA that didn't include biodiversity studies and evaluation of the impacts on sturgeon species. The project would completely change the hydrological, sedimentation and temperature regime of Rioni and destroy the **last spawning habitat of six sturgeon species in Georgia and SE Black Sea Basin**: beluga (*Huso huso*), European sturgeon (*Acipenser sturio*), stellate sturgeon (*A. stellatus*), Russian sturgeon (*A.guldenstaedtii*), ship sturgeon (*A. nudiventris*) as well as endemic Colchic sturgeon (*A. colchicus/guldenstaedtii colchicus/persicus colchicus*). All these are listed as Critically Endangered globally by the IUCN Red List and included in the National Red List of Georgia. Other significant protected natural habitats and habitats of species from Resolution No. 4 (1996) and Resolution No. 6 (1998) would be destroyed by flooding, new transmission lines, clear cuts, encroachment, disturbance and possible accidents due to construction in earthquake and landslide prone areas. The World Sturgeon Conservation Society (WSCS) strongly criticizes the project as "non-compliant and ecologically-risky".[1] The current complaint is a result of the lack of a national plan for the protection of water courses as required by the Bern Convention Bureau regarding complaint 2016/9[2]. Namakhvani Project is not justified due to lack of cost-benefit analysis of the project and absence of a National Energy Strategy.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

[1] https://www.wscs.info/wp-content/uploads/2021/06/Statement-re-Namakhvan-Hydropoweri.pdf
[2] https://rm.coe.int/report-of-the-bureau-meeting-7-8-april-2020/16809e4c1c?fbclid=IwAR0OZMh58kU1TGPP9EofHSKPAjOefpIiM8CaeBC_xyis_y7AbFdQ2fHCOD0

Sturgeon species (100% of spawning habitats in Georgia): *Huso huso* (critically endangered - CR), *Acipenser sturio* (CR, IN MOD: Rioni), *A.stellatus* (CR). **Other fish species:** *Aspius aspius* (IN MOD: Rioni), *Rhodeus amarus* (IN MAJ), *Eudontomyzon mariae* (IN MAJ), *Barbus (plebejus) tauricus rionica* (VU, NE). **Mammals:** *Lutra lutra*, (>15% of population in Black Sea biogeographical region, IN MOD), *Lynx lynx* (stepping stone habitat between Emerald sites), *Ursus arctos* (stepping stone habitat between Emerald sites), several bat species (not assessed). **Birds:** *Gyps fulvus (*4-7 pairs affected, IN MOD), *Neophron percnopterus* (1 pair affected, EN, IN MOD), *Alcedo atthis* (IN MOD: Rioni), *Larus melanocephalus* (IN MOD: Rioni extension); birds breeding on Rioni River islands: *Sterna hirundo* (IN MOD), *Sterna albifrons* (IN MIN); Non-Resolution 6 migratory birds (IN MOD: Rioni Delta);

Habitats: Sparsely vegetated river gravel banks (C3.55, IN MOD), Riparian and gallery woodlands (G1.1, IN MAJ), Unvegetated river gravel banks (C3.62, IN MOD), Moist or wet tall-herb and fern fringes and meadows (C5.4, IN MAJ), Caucasian *Fagus* forests (G1.6H, SUF/CD), Mixed deciduous woodland of the Black and Caspian Seas (G1.A7, IN MIN), Euxinian ravine forests (G1.A47, IN MOD), Littoral sand and muddy sand (A2.2, IN MAJ), Coastal dune scrub (B1.6, IN MAJ), Basic and ultra-basic inland cliffs (H3.2, SR). About 200 ha of riparian habitats, 400 ha of natural forests and 100 ha of coastal habitats will be impacted.

*** IUCN status and final conclusions after the 2017 and 2019 biogeographical seminars given where relevant**

3. What might be the negative effects for the specie/s or habitat/s involved?

Namakhvani Project encompasses two HPPs on the Rioni River: Lower Namakhvani HPP (324 MW with reservoir area of 510 ha) and Upper Namakhvani HPP (86.8 MW with area of 100 ha). The preliminary construction works started in 2020 without the completion of a number of studies required by law. There are 4 run-of-river hydropower dams on Rioni and tributaries constructed during 1933 – 1976 that only partially destroyed sturgeons' habitats. Spawning of sturgeon was still possible downstream because all these relatively low dams did not entirely modify the hydrological flow regime of the river.

The **Namakhvani Project** with its planned high water storage type dams (101 m for Lower Namakhvani) **will modify the natural seasonal hydrological flow pattern of the Middle and Lower Rioni and the** magnitude and timing of water discharge will depend on peak energy demand, thus adversely affecting:

a) the effectiveness of reproduction of sturgeons - in the absence of seasonal flood peaks, which clean the hard substrate of the bottom of the river of fine sediments, sturgeons cannot spawn because their eggs cannot adhere to the substrate and will die; b) the available habitats in the downstream sections and natural hydro-ecological processes; c) the annual temperature cycle through deep water discharge from the reservoir; d) the disruption of the ecological flows of the river during the first phase of operation; e) the daily water level fluctuations (hydropeaking) which will affect both the habitats and the faunal elements inhabiting the river sections below the facility; f) the sediment transport into the lower river sections resulting in incision of the river into the landscape and the loss of its connection with its floodplain; g) the migration of the sturgeon and other fish species for reproduction; h) the food base for young sturgeon during the early life phases and for other species.

Additionally, a colony of griffon and Egyptian vultures nesting close to Tvishi village would be highly threatened by the construction of new transmission lines for the project (financed by EBRD) just above the cliffs where the birds breed and construction of Upper Namakhvani HPP below the cliffs.

Old-growth Forest habitats, inaccessible up to now, would also be destroyed, flooded by the two new reservoirs and logged for the new transmission lines. These are stepping stone habitats for large mammals.

River and riparian habitats underprotected in the Emerald Network (IN MOD, IN MAJ for Black Sea region) would also be seriously impacted by changed hydrological and sedimentation regime and flooding.

Changes on lower Rioni will also impact birds that would not be able to breed on or use during migration river islands and coastal habitats (including Rioni Delta) shrinking due to greatly reduced sediment transport.

Sparsely vegetated river gravel banks (C3.55) and Riparian and gallery woodlands (G1.1) will be lost due to construction of the Lower Namakhvani dam and associated infrastructure.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald network site?

Ignoring the conclusions of the 2017 and 2019 biogeographical seminars, the Georgian Government didn't propose the protection of Rioni as new Emerald site or **extension of Kolkheti (GE0000006)** and this would be meaningless if Namakhvani Project is constructed. No appropriate assessment on Emerald site Kolkheti (GE0000006) was carried out as well as impact of planned Upper Namakhvani HPP on Emerald site Prometheus cave (GE0000039) located in the same karst system.

The project will impact the Ramsar site Wetlands of Central Kolkheti[3] (33710 ha) and new World Heritage site Colchic Rainforests and Wetlands. The decision by UNESCO requested to stop large development projects until proper assessment on impacts on the OUV has been done and urged Georgia to protect sturgeon habitats[4].

The Namakhvani Project violates obligations deriving from the Bucharest Convention, the Convention on Migratory Species (many bird and fish species), as well as the EU Habitat and Birds Directives, and the Water Framework Directive which Georgia has agreed to implement. The project also violates the conclusions and recommendations drawn by the UN/FAO Central Asian and Caucasian Fisheries and Aquaculture Commission, to which Georgia is a signatory State (respective documents signed in Istanbul, 2011) and the "Pan-European Action Plan for Sturgeons" (Bern Convention, 2018), where it was determined that a special protection area should be created on Rioni.

5. Do you know if there are any pending procedures at the national or international level regarding the object of your complaint?

On April 8, 2020 Green Alternative filed a lawsuit in the City Court against the environmental permit of Lower Namakhvani[5]. Georgian Young Lawyers Association appeals the same ministerial order on behalf of local people from affected villages. The Social Justice Center appeals the construction permit issued without proper documentation. Most of the land for the Namakhvani Project has been acquired by the major shareholder ENKA Renewables LLC. Since October 2020 local people and supporters are blocking the roads to the site. In March 2021, 22000 people participated in the largest environmental protest in Georgia leading to temporary suspension of construction. Since May 2021 the Secretariat of the Energy Community Treaty is assisting the civil society and the government in a mediation over the dispute.[6] There is ongoing process to hire a company to revise the EIA. In September 2021 ENKA announced the termination of the Build-Operate Agreement that had been signed with the Georgian State.[7] None of the permits for the project are cancelled yet and the Georgian State is looking for options to continue construction.

[3] https://rsis.ramsar.org/ris/893
[4] DECISION 44 COM 8B.8 page 313 in http://whc.unesco.org/archive/2021/whc-21-44com-18-en.pdf
[5] https://greenalt.org/disputes_complaints/mtsvane-alternativa-namakhvanis-hesebis-kaskadis-msheneblobasa-da-ekspluatatsiaze-garemosdatsviti-gadatskvetilebis-gaukmebas-itkhovs/
[6] https://www.energy-community.org/news/Energy-Community-News/2021/05/06.html
[7] https://www.kap.org.tr/en/Bildirim/964595

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc)

An EIA report was prepared in 2019 without proper studies on sturgeons, downstream impacts, impact on protected areas (Kolkheti National Park and Katsoburi Managed Reserve), cumulative effect with other dams and transmission lines, appropriate assessment of impacts on Emerald sites (GE0000006, GE0000041, GE0000057, GE0000039), cost-benefit analysis (mandatory according to Georgian legislation - EIA Code) etc.[8]

[8] https://namakhvani.enka.com/en/about-us/studies/

Annex 1

Detailed impacts of Namakhvani Hydropower Project on species and natural habitats of global, European and national importance

Lower Namakhvani dam and tunnel construction site, July 2021. Credit: Andrey Ralev, CEE Bankwatch Network

A. Impacts on sturgeon species

If constructed, Namakhvani project would have catastrophic consequences for the survival of the unique Rioni River sturgeon populations because of the design of the plants with high dams and the magnitude and timing of discharge of water. The construction of dams with similar characteristics has practically wiped out sturgeon habitat in other Georgian rivers (Enguri) and worldwide. Construction of hydropower plants alongside overfishing/poaching are the main drivers for the global extermination of sturgeon species. 17 out of 27 *Acipenseriformes* species are globally Critically Endangered according to the IUCN Red List.

For more information on impacts on sturgeon species please contact:
Eng. Dr. Radu Suciu, Founder of the Sturgeon Research Group at DDNI Tulcea (1994 - 2018), radu.suciu34@gmail.com

Sturgeon species of the Rioni River

The Rioni River is the last river in the south-eastern part of the Black Sea that still has sturgeon species actively migrating upstream for reproduction. It is the only remaining documented spawning river for the endemic Colchic sturgeon (*Acipenser colchicus* (c.f. *A. persicus colchicus* or *A. güldenstädtii colchicus*)) globally and the only remaining river in the entire Black Sea that has functional spawning habitat available for the ship sturgeon (*A. nudiventris*). Beluga (*Huso huso*) and stellate sturgeon (*Acipenser stellatus*) in the Rioni River are also still considered to be spawning or attempting to spawn on an annual basis. The European sturgeon (*Acipenser sturio*) has been native to the Rioni River but is at present considered as missing or even extinct since the early 1990s.

Juvenile sturgeon – believed to be a Colchic sturgeon. Credit: Tamar Edisherashvili/FFI

Georgia as a Party to the Bern Convention has adopted both the Action Plan for the Protection and Restoration of the European Sturgeon and the Pan European Action Plan for Sturgeons, both emphasizing the need for effective protection and restoration of habitats in those rivers where sturgeons are still actively reproducing. Substantial efforts have already been made in the past decade by several institutions to implement a collaborative and synergistic program to save the remaining sturgeon populations, reduce the impacts by an uncontrolled, unregulated fishery as well as to secure the critical habitats.

Existing hydropower projects of the Rioni River and sturgeons

There are three existing large hydropower cascades on Rioni (Vartsikhe[9], Rioni[10] and Gumati[11]) and one on its tributary Lajanuri (Lajanuri HPP[12]). Even after the construction and operation of these 4 run-off-river hydropower dams during 1933 - 1976, the Rioni was still providing spawning habitats and conditions for populations of 5 sturgeon species which were adapted to spawn on the gravel grounds downstream the Vartsikhe dam (river Km 129); more recently (2018 - 2021) Flora and Fauna International (FFI) and Ilia University students working closely with local fishermen and anglers have shown by capturing young of the year that at least three species had successfully recruited in the Rioni: stellate sturgeon (*Acipenser stellatus*), Colchic sturgeon (*Acipenser colchicus / persicus colchicus / güldenstädtii colchicus*) and ship sturgeon (*Acipenser nudiventris*).[13] Spawning of sturgeon was possible because all these **run-off-river type dams did not entirely modify the hydrological flow regime of the river**; the Rioni still has every year three high water / flooding periods, in spring (due to snow melting), summer (due to glacier melting) and fall (due to heavy rain season), which are essential conditions for the spawning of sturgeons.

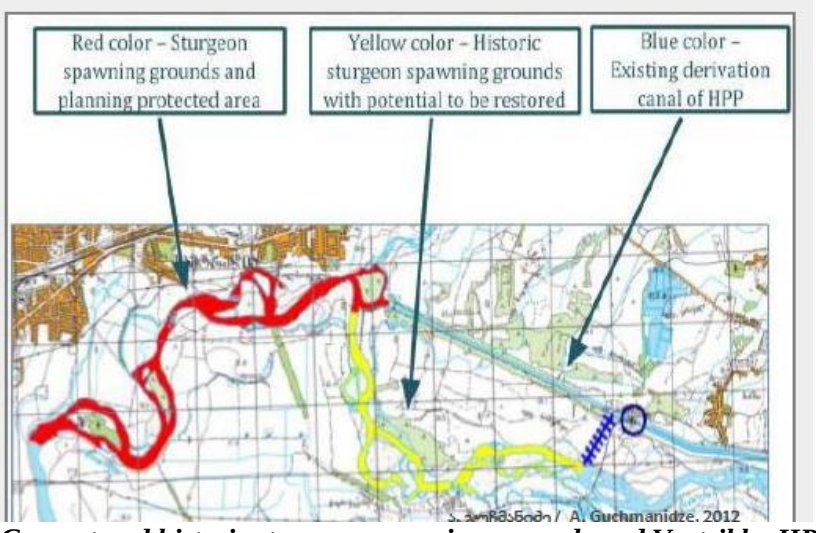
[9] http://globalenergyobservatory.org/geoid/41913

[10] http://globalenergyobservatory.org/form.php?pid=43010

[11] http://globalenergyobservatory.org/form.php?pid=43009

[12] http://globalenergyobservatory.org/form.php?pid=43006

[13] https://www.cambridge.org/core/journals/oryx/article/ship-sturgeon-rediscovered-in-the-rioni-river-in-georgia/60F1A4B62B9233BA21A71A8A11179D6B



Current and historic sturgeon spawning grounds and Vartsikhe HPP. Credit: A. Guchmanidze

Impacts of the Namakhvani Project on sturgeon species

Namakhvani Project encompasses two HPPs on the Rioni River: Lower Namakhvani HPP (324 MW with reservoir area of 510 ha) and Upper Namakhvani HPP (86.8 MW with area of 100 ha). The construction of Lower Namakhvani 101 meter-high dam and tunnel started in 2020, but in March 2021 was stopped by local protests.

The Lower Namakhvani HPP with its planned 101 m high water storage type dam (at river Km 166) **will modify the natural seasonal hydrological flow pattern of the Middle and Lower Rioni**. In the absence of seasonal flood peaks, which clean the hard substrate of the bottom of the river of fine sediments, sturgeons cannot spawn because their eggs cannot adhere to the substrate and will die. There are worldwide many similar cases, one which was intensively studied and were this mechanism was demonstrated - the impact of the construction in 1974 and operation of the Libby Dam on the upper Kootenai River, Montana, USA, on the white sturgeon (*Acipenser transmontanus*) population[14]. A similar catastrophic impact on the survival of populations of sturgeons was caused by the construction and operation of the Enguri dam during 1961 - 1987, which left the Rioni as the last and only functional sturgeon river in Western Georgia and the whole SE Black Sea basin. According to an article from 1976 "*due to the construction of Enguri HPP on Enguri River and Vartsikhe cascade on Rioni River the conditions for natural reproduction of sturgeons deteriorated sharply. Enguri River completely lost its importance for sturgeons. The remaining spawning grounds at the Rioni River ensure natural reproduction of beluga, Russian sturgeon, stellate sturgeon, Atlantic sturgeon, ship sturgeon, no more than 20-25% of the previous capacity*".[15]

The magnitude and timing of discharge of Lower Namakhvani HPP and Upper Namakhvani HPP will depend on peak energy demand. The cumulative impacts of both plants are described in a statement by the World Sturgeon Conservation Society to the Georgian Government.[16]

"*The impacts, as foreseen from the available planning data, mainly relate to the alteration of seasonal water discharge adversely affecting:*

a) the available habitats in the downstream sections and natural hydro-ecological processes, such as gravel turnover, sediment outwash etc.;
b) the annual temperature cycle through deep water discharge from the reservoir;

14 https://www.researchgate.net/publication/271253155_Kootenai_River_white_sturgeon_Synthesis_of_two_decades_of_research

15 Ninua N. S., Ways to preserve sturgeon fauna and develop industrial sturgeon breeding in the Rioni river basin

16 https://www.wscs.info/wp-content/uploads/2021/06/Statement-re-Namakhvan-Hydropoweri.pdf

c) the disruption of the ecological flows of the river during the first phase of operation;
d) the daily water level fluctuations (hydropeaking) which will affect both the habitats and the faunal elements inhabiting the river sections below the facility;
e) the sediment transport into the lower river sections resulting in incision of the river into the landscape and the loss of its connection with its floodplain;
f) the migration of the sturgeon species for reproduction;
g) the effectiveness of reproduction due to the above mentioned impacts;
h) the food base for young sturgeon during the early life phases."
It is still not clear if the Namakhvani Project will further increase/change the diversion of water from the Tskhenistsqali River and how this would additionally impact the existing sturgeon habitats of Lower Rioni and potential habitats of Tskhenistsqali.

B. Impacts on other fish species

Although in the EIA of Namakhvani Project there is no detailed research on fish species of the Rioni River, based on published scientific data[17] we assume that the project will impact the following fish species protected under the Bern Convention (biogeographical seminar assessment given where appropriate) or under the national legislation:
Other **fish species:** asp (*Aspius aspius*, IN MOD: Rioni), European bitterling (*Rhodeus amarus*, IN MAJ), Ukrainian brook lamprey (*Eudontomyzon mariae*, IN MAJ), Colchic barb (*Barbus (plebejus) tauricus rionica*, VU, NE), Batumi shemaya (*Chalcalburnus chalcoides derjugini*, NE); Colchic khramulya (*Capoeta sieboldii*), Colchic gudgeon (*Gobio caucasicus*), Transcaucasian sprilin (*Alburnoides (bipunctatus) fasciatus*), Transcaucasian nase (*Chondrostoma colchicum*), kutum (*Rutilus frisii*), Monkey goby (*Neogobius fluviatilis*). Many reophylic species live in the areas to be flooded, others will be impacted downstream.

As there are no targeted studies post-operation of hydropower dams in Georgia on freshwater fauna the magnitude of these impacts is not clear. However, anecdotal evidence and data from other biodiversity studies can be used to deduce some of their consequences.[18] Hydropower facilities outside of Georgia's national borders, such as the Mingachevir Dam on the Kura River in Azerbaijan have affected freshwater fauna. The original dam at this site was constructed during the Soviet period and began operation in 1953, with a height of 80 m and a flooded reservoir area of 605 km2 (15.7 km3 volume). The Mingachevir Dam's closure effectively split the Kura River Basin into an upper and lower portion and disconnected its headwater region within Georgia from the Caspian Sea. This split was followed by the subsequent extinction of Caspian lamprey (*Caspiomyzon wagneri*) and sturgeons in the upper Kura Basin (Demetrashvili, 1963)[19].

C. Other downstream impacts

River and riparian habitats not sufficiently protected in the Emerald Network of Georgia and assessed as Insufficient Moderate (IN MOD) and Insufficient Major (IN MAJ) for Black Sea region would also be seriously impacted by changed hydrological and sedimentation regime and flooding. The most severe impacts will be on Sparsely vegetated river gravel banks (C3.55, IN MOD), Riparian and gallery woodlands (G1.1, IN MAJ), Unvegetated river gravel banks (C3.62, IN MOD), Moist or wet tall-herb and fern fringes and meadows (C5.4, IN MAJ). Changes on lower Rioni will also impact the Eurasian otter (*Lutra lutra*, IN MOD) as well as birds that would not be able to breed on or use during migration the river islands and coastal habitats (including Rioni Delta) shrinking due to greatly reduced sediment transport. These birds include waders, terns, gulls, egrets, herons and cormorants.

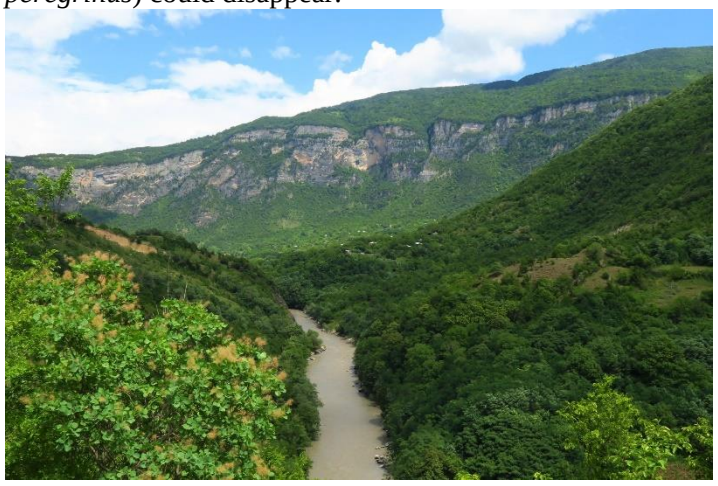
[17] http://eprints.iliauni.edu.ge/352/ and https://www.researchgate.net/publication/341641813_Checklist_of_the_freshwater_fishes_of_Armenia_Azerbaijan_and_Georgia
[18] https://www.sciencedirect.com/science/article/abs/pii/S0006320721004110?dgcid=rss_sd_all
[19] Demetrashvili, M., 1963. Trade Freshwater Fishes of Georgia. Academy of Science of Georgia, 95pp. (in Georgian).

Eurasian oystercatcher (*Haematopus ostralegus*, globally Near Threatened) breeding on a Rioni island. Credit: Andrey Ralev

D. Impacts from the EBRD-financed transmission lines and cumulative impacts

In 2019 the European Bank for Reconstruction and Development (EBRD) approved a EUR 90 million loan to Georgia to support Georgian State Electrosystem (GSE) to implement reinforcement and enhancement of the electricity transmission grid in Georgia.[20] One of the four components of the Power Grid Enhancement Project is the construction of the *North Ring* with new connections to Namakhvani HPP. The project ESIA does not assess the cumulative impact of the transmission lines, their associated facilities and the new hydropower plants.

Our field visit in July 2021 shows the opposite. A colony of griffon and Egyptian vultures nesting close to Tvishi village would be highly threatened by the construction of the new connection to Upper Namakhvani just above the cliffs where the birds breed, whilst construction of Upper Namakhvani HPP would be just below the cliffs. As a result, several pairs of griffon vulture (Gyps fulvus), a pair of the globally endangered Egyptian vulture (*Neophron percnopterus*) and a pair of peregrine falcon (*Falco peregrinus*) could disappear.



Cliffs with nesting vultures above Tvishi village. Credit: Andrey Ralev

Old-growth forest habitats, inaccessible up to now, would also be destroyed, flooded by the two new reservoirs and logged for the new transmission lines. These are stepping stone habitats for brown bear (*Ursus arctos*) and lynx (*Lynx lynx*) between the Emerald sites Samegrelo 2 (GE0000057) and Racha 3 (GE0000041).

[20] https://www.ebrd.com/work-with-us/projects/psd/51422.html

Old-growth Caucasian forests next to Rioni River. Credit: Andrey Ralev

E. Inscription on the UNESCO World Heritage List and consequences for Rioni River

In July 2021 the World Heritage Committee inscribed the Colchic Rainforests and Wetlands on the World Heritage List "*as a unique ecosystem hosting outstanding biodiversity*", and particularly justifies listing under criteria X by the fact that "*the property also harbors sturgeon species, including the Colchic Sturgeon*".[21] However, current initial areas inscribed exclude the Rioni River itself, which puts in question sufficiency of protection measures to safeguard "*outstanding universal value*". The UNESCO decision has several clauses aimed to overcome that discrepancy.

First, it *"commends the State Party for its commitment to ... consider further enhancement of the conservation of the property by potentially adding additional areas, especially to protect critically endangered sturgeon through plans for a new protected area adjacent to the property;"*. Second it "*Strongly encourages the State Party to submit the proposed extensions of the buffer zones of the Churia component part towards the North and of the Nabada component part to support the conservation of the sturgeon population as a minor boundary modification, if possible, by 1 February 2023;".* Third, it requests that "*Any development projects need to be subject to rigorous Environmental Impact Assessment procedures, and should not go ahead in case of potential negative impacts on the property's Outstanding Universal Value."*

This effectively means that activities which may impact sturgeons and other biodiversity listed under criteria X should be stopped until their impacts on "outstanding universal value" are assessed in an EIA which satisfies IUCN Advice on World Heritage EIAs. It also means that UNESCO expects that by 1 February 2023 the Georgian Government submits to the World Heritage Center a fully prepared proposal for "minor boundary modification" to include key habitats which ensure survival of sturgeon in Rioni River. This will enable approving this proposal at the 46th Session of the World Heritage Committee in July 2023.

In case Georgian Government fails to perform EIA and goes ahead with activities which present potential danger of decimating sturgeon populations in and around the World Heritage Property, it would present a case for inscription of the World Heritage property on the list of "World Heritage in Danger" and development of a plan of corrective measures to safeguard the outstanding universal value.

[21] http://whc.unesco.org/archive/2021/whc-21-44com-18-en.pdf