

# MAVROVO NATIONAL PARK AND PLANNED HYDROPOWER PROJECTS ON IT'S TERRITORY

NGO report  
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Bern Convention Standing Committee meeting,  
Strasbourg, 27-30.11.2018



# About the case

- Complaint submitted in 2013
- Case file opened in 2014
- On the spot appraisal 2015
- Recommendation 184 (35<sup>th</sup> Standing Committee meeting)



# Decision at the 35<sup>th</sup> Standing Committee meeting

- **Suspend the implementation of all government projects, in particular the hydropower plants** foreseen and related infrastructure, within the territory of the Mavrovo National Park, **until a Strategic Environmental Assessment will be completed** taking into account the following point of the Recommendation, putting specific emphasis on cumulative effects of all planned development activities on the territory of the Park, also taking into account social aspect; the assessment needs to consider the regional long-term effects, on the water regimes of the Drim and Vardar rivers;

# Decision at the 37<sup>th</sup> Standing Committee meeting

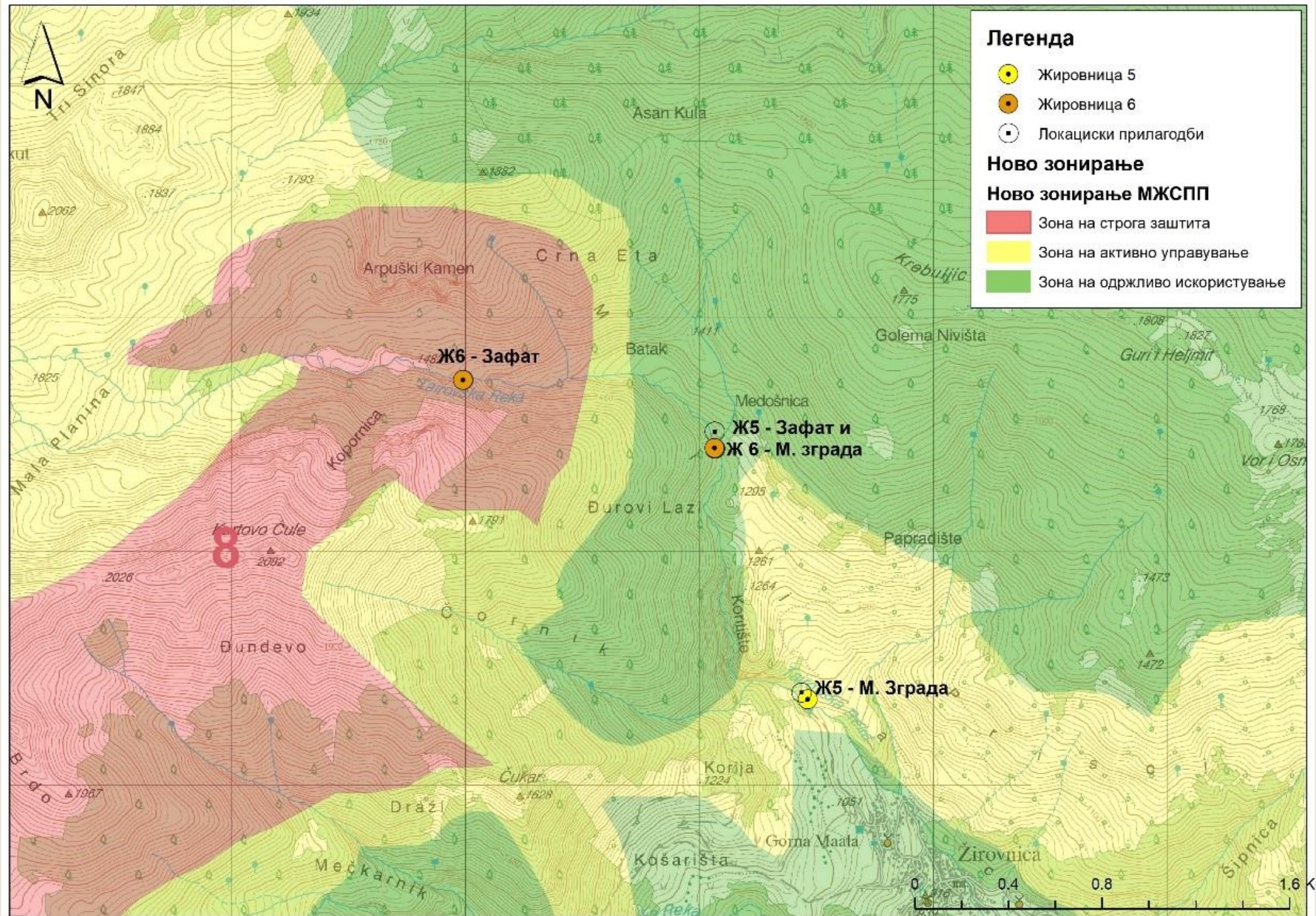
- The Standing Committee decided to **keep the case file open**. It expressed its **concern with the continued development of low-performing hydro power plants** in the area of the National Park and reminded that **the development of an SEA** on the cumulative impact of all planned activities on the territory of the Park, as recommended, **should be developed prior to the construction** of new facilities, which will inevitably have an effect on biodiversity

# Update on the case

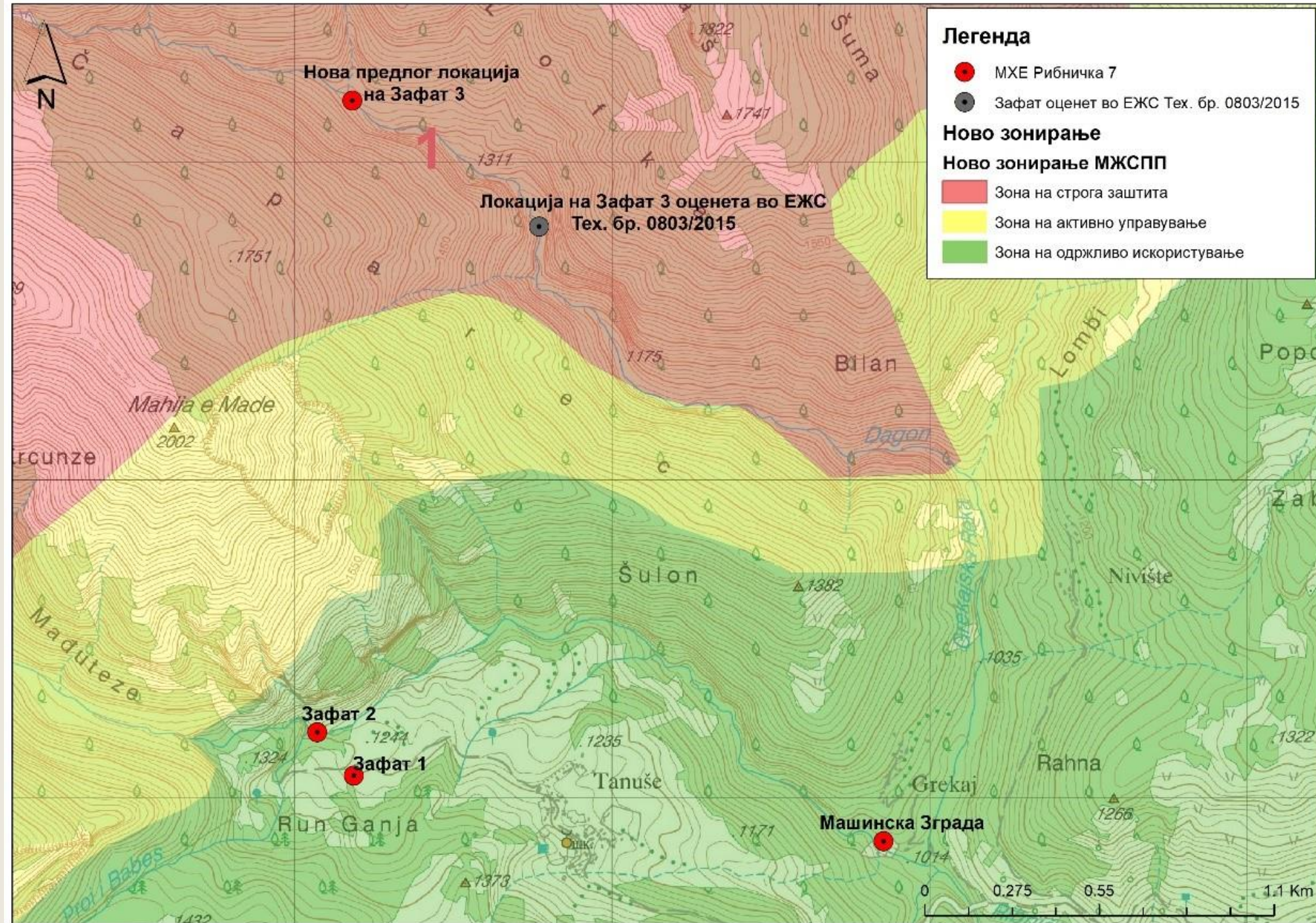
- The Government has still not suspended the 15 LHPPs.
- Ongoing activities for the upcoming construction of the following 4 LPHPPs:
  - *Zirovnicka 1 (ref. No. 5);*
  - *Zirovnicka 2 (re. No. 6);*
  - *Ribnicka (ref. No. 7);*
  - *Jadovska (re. No. 9).*
- The concession agreements from 2015 should have been terminated in May/June 2018.

# Update on the case

- The Government signed an Annex to the concession agreements and extended the deadline until the 07.05.2019 for LPHPP Ribnicka and until 03.01.2020 for LPHPPs Zirovnicka 1 and 2.
- For Jadovska river LHPP, a new public call for concession is planned (letter from Government ref no. 11-4414/2 from 9.10.2018).
- The Government did not disclose the details about the reasons for the extension of the agreements.
- Changes in locations of powerhouse and intakes of planned LHPPs.







# Key questions to answer

- What is the justification?
- What shall be the impact of the new location?
- Shouldn't there be a new environmental study?
- Is the new deadline realistic?













**Krapska river LPHPP construction  
Emerald site**





To the Bern Convention Secretariat  
 To the attention of Mr. Na Christensen  
 Skopje, 08.10.2018

**Subject: Update of the report case No. "Macedonian National Park and planned hydropower projects on its territory"**

Dear Mr. Christensen,

With this letter we would like to provide you with an update on the open case No. "Macedonian National Park and planned hydropower projects on its territory". The update covers the period between February 2018 and October 2018.

**1. Low performing Hydropower plant development**

As we previously informed the Standing Committee, there are 13 low performing hydro power plant (LPHPP) projects planned in Macedonian National Park out of which 4 LPHPPs are already 50% meeting the Standing Committee "agreed to consent with the conditional development of low-performing hydro power plants in the area of the National Park and requested that the development of an SEA recommended, should be prioritized 600% in the territory of the Park, as well as to have an effect on biodiversity."

However, the Government has still not suspended the 13 LPHPPs. You are only concerned with the ongoing activities for the upcoming construction of the following 4 LPHPPs:

- Zrnovska 1 (ref. No. 5);
- Zrnovska 2 (ref. No. 6);
- Melnicka (ref. No. 7);
- Jabunka (ref. No. 8).

The concession agreements for these LPHPPs were signed in the period of May/June 2015. According to the concession agreement the investor has a maximum of 3 years to initiate the above-mentioned deadline, the concession agreement should have been terminated in May/June 2018.

Unfortunately, in contrast to the Bern Convention Recommendation No. 184 (2016), in January 2018 the Government signed an Annex to the concession agreements and extending the deadline until the 07.06.2018 for LPHPP Melnicka and until 02.01.2020 for LPHPPs Zrnovska 1 and 2. According to their written response, for LPHPP Jabunka the Government plans to publish a new public call for concession.

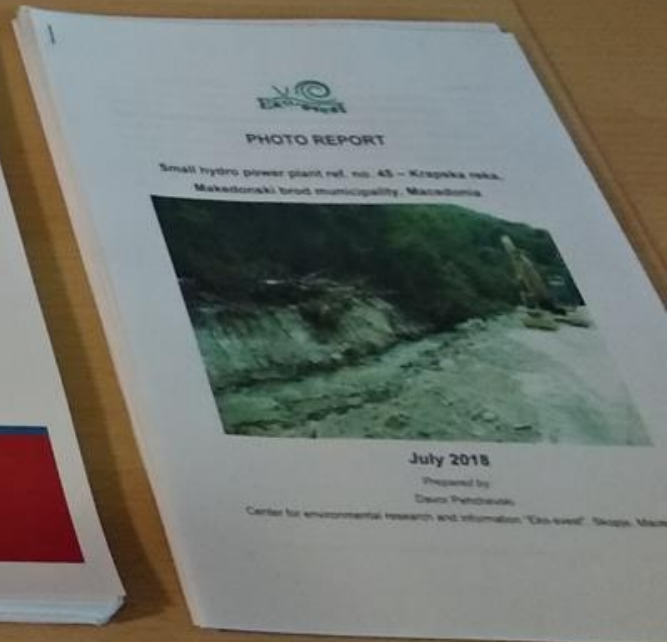
The justification for this step is found in changes of the locations of the intakes and the power house. Extension of the deadline and changing the locations raise the following additional sub-questions:

- What shall be the impact of the new location? The intakes are located deeper in the zone of strict protection, additional supporting infrastructure e.g. new 500m road will

**Ecological integrity assessment of four rivers in Macedonia affected by derivation hydropower schemes based on aquatic macroinvertebrates**

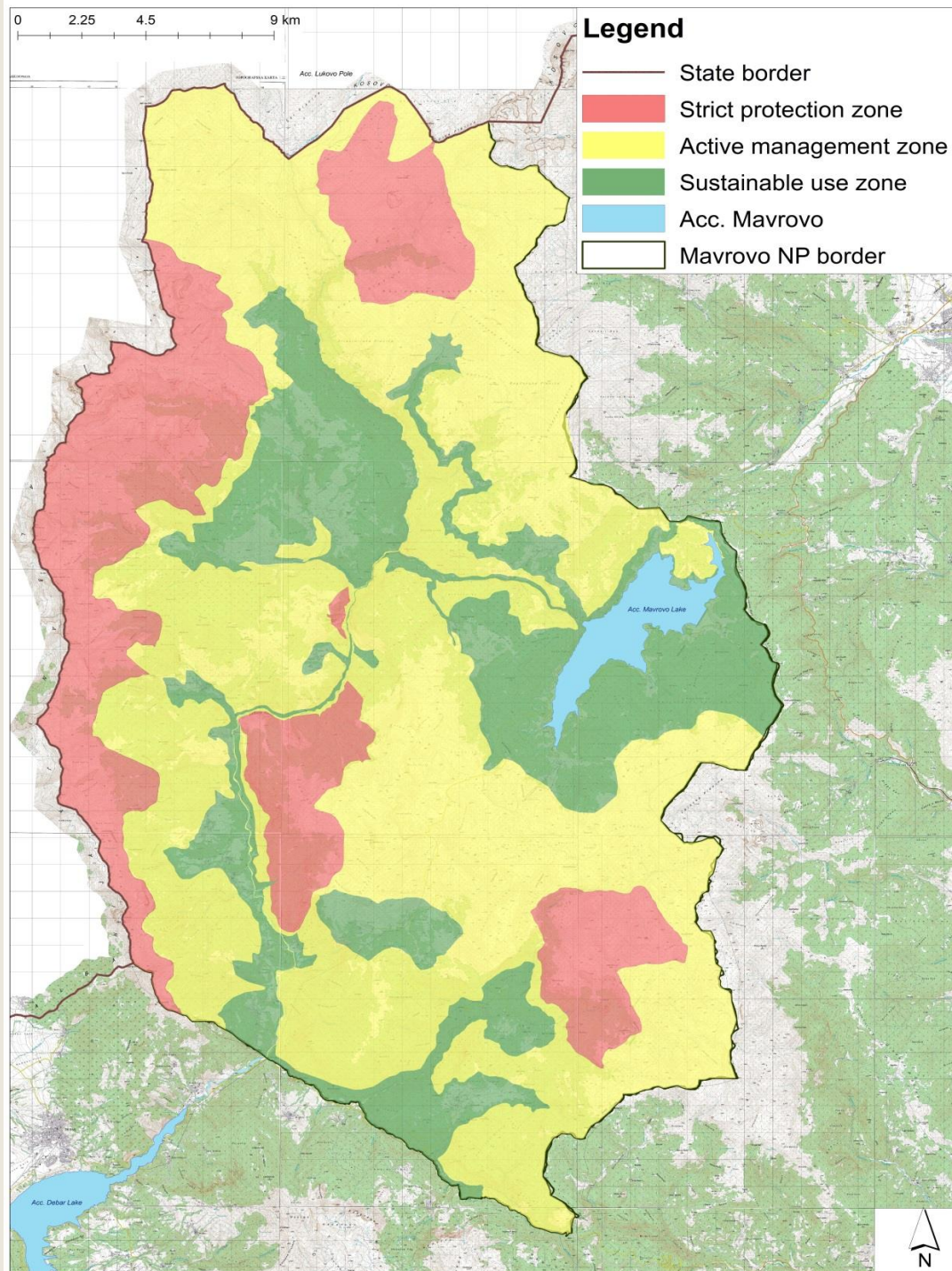
FINAL REPORT

Valentina Slavevska Stamenkovic  
 Jelena Hinić



# New Law on Mavrovo NP

- Complainant and partners CSOs have worked with the Ministry on environment on the next steps with the finalization of the new Mavrovo NP protection law.
- The Ministry has asked the Bern Secretariat for expert support in this process.
- CSO experts have prepared new zoning of the NP based on IUCN guidelines.



## New zoning proposed by experts

- 20.7 % (ca. 15,176 ha) of Mavrovo National Park classify for the zone of strict protection
- 55.3 % (ca. 40,521 ha) of Mavrovo National Park classify for the zone of active management
- 22.2 % (ca. 16,309 ha) (+1.8% accumulation lake) of Mavrovo National Park classify for the zone of sustainable development

# Proposal to the Standing Committee

- Keep the case file open
- Provide expert support to the Government of Macedonia on the finalization of the new Law for the reproclamation of Mavrovo NP
- Request urgent suspension of low performing hydro projects in Mavrovo at the highest political level.

THANK YOU FOR YOUR  
ATTENTION

