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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

40th meeting
Strasbourg, 30 November - 4 December 2020

Specific Sites - Files open

**Hydro power development within the territory of
Mavrovo National Park
(North Macedonia)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
Eko-Svest*

**To the Bern Convention****Attn: Ms. Ursula Sticker, Secretary of the Bern Convention**

Skopje 27.10.2020

Subject: Report from the Complainant on the case file 2013/1

Dear Ms. Sticker,

On behalf of the complainant Eko-svest, for the open case file 2013/1 Hydro power development within the territory of Mavrovo National Park, I am providing you with a short report and proposals for a way forward regarding the case.

1. Progress with the SEA and cumulative impact from planned infrastructure

There has been no progress regarding the development of an SEA study that would incorporate a cumulative impact assessment of planned infrastructure in the Park. Moreover, in spite the several requests from the Ministry of environment, the Park authority has not submitted the necessary documentation (proposal for zoning), so the process for the adoption Law on re-proclamation of Mavrovo NP is also, halted.

Although new construction of small hydro power plants has not been registered, there are ongoing processes for development of large touristic zones and residential complexes. Therefore, the cumulative impact assessment is more than needed and **should be carried out in the upcoming process of re-proclamation of the protected area.**

2. Development of small hydro power plants

As indicated, there has been no new construction of small hydro power plants in the Park. However, concession contracts are being extended and local communities are being pressured by investors. On a more general scale, the new Government has published its new 4 year programme where it stated that it plans to abolish small hydro power plants in protected areas. We believe that already issued concessions and signed contracts will not be abolished and they remain to be a risk for the Park.

Still, the green scenario of the Energy Strategy does plan for an additional hydro capacity (both from large and small hydro power plants) but does not clearly indicate the locations of the planned capacities.

3. Proposals for way forward

Being aware of the pandemic and limitations to travel we understand that carrying out the On the spot appraisal will be a challenging task even in 2021. Therefore, we would like to propose carrying out online consultative sessions and meetings with all relevant stakeholders and preparing a report based on these consultations. Eko-svest is offering its capacities to organize and logistically support the Secretariat in this process, if you find it useful and appropriate. We think that the findings of the On the spot appraisal are crucial for the nature conservation framework in our country and we believe that the recommendations put forward by the experts will be very useful for improving of our legislation and practices when it comes to species and habitats protection. Waiting for another 8-10 months might result in slower processes on national level and missed opportunities in the conservation work. As an example,

the draft Law on nature (2018) is still pending finalization. The expert opinion on this legislation will speed up the finalization and adoption of this important piece of legislation, relevant for the country and the accession process towards the EU.

As a final remark, we would like to kindly ask the Secretariat to extend an invitation to the Ministry of environment and physical planning for their participation at the upcoming Standing Committee meeting.

We remain at your disposal should you have any questions,

Sincerely,

Ana Colovic Lesoska

Eko-vest

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