



Banja Luka, 12.03.2013.

REPUBLIC OF SRPSKA GOVERNMENT
Ministry for Spatial Planning, Civil Engineering and Ecology

Dear Minister Golic,

Based on the Decision of consent for the construction of small hydro power plants (up to 5 MW) in the area of National Park Sutjeska, which was adopted by the Republic of Srpska Government on the second February of 2012 (04/1-012-2-204-12) and the concessions assigned for the following small hydro power plants: "Sutjeska 2A", "Sutjeska 2B", "Hrčavka 1", "Hrčavka 2", "Hrčavka 3" and "Jabušnica", we are hereby representing to you our opinion as well as reasons due to which we are against those plans.

This letter is sent to you in the name of non-governmental organizations from Bosnia and Herzegovina: Arbor Magna, Society for research and protection of the biodiversity, Eco Action, Association of Biology Students, Ornithological Society Our Birds and Center for Environment, as well as two international networks of NGO's – Friends of the Earth Europe and CEEweb for Biodiversity.

Reasons for which we oppose the construction of small hydro power plants (SHPP) in the National park Sutjeska are:

1. Some Natura 2000 areas (stated below) can be found in the canyons of Sutjeska, Jabušnica and Hrčavka rivers. Natura 2000 is a network of areas dedicated to conservation of nature in European Union and National Park Sutjeska is without a doubt a future Natura 2000 site.
 - 3220- Alpine rivers and the herbaceous vegetation along their bank
Assessment of vulnerability and necessary protection measures: In order to maintain the immutability of such areas the water regime must not be altered or regulated in any manner. The build up of bigger or smaller accumulations, as well as any form of regulation of the riverbed are one of the biggest dangers for the disappearance of such habitats in our country.
 - 3240- Alpine rivers and their ligneous vegetation with *Salix elaeagnos*
Vulnerability assessment: The habitat is endangered since it is a type of pioneering communities connected to the community of the gray alder (*Alnus glutinosa*), which can with an improvement in soil create *Alnetum incanae*.
 - 8210- Calcareous rocky slopes with chasmophytic vegetation
Edraiantho-Daphneetum malyanae (Lakusic & Silic 1968) is and endemic chasmophytic community from the canyon of Sutjeska. They are characterized by *Edraianthus sutjeskae* and *Daphne malyana*.
2. A small hydro power plant "Sutjeska 2A" is planned in the immediate vicinity of the primeval forest Perućica (1 km in a straight line), which is in the first category of protection and shouldn't suffer any negative impacts. Those impacts would be impossible to avoid if a SHPP was built, due to the noise, possible contamination and a guaranteed change in micro-climate.



3. NP Sutjeska is one of the potential IBA areas in Bosnia and Herzegovina (Important Bird Area). Among the species important for this area there are: Golden Eagle (*Aquila chrysaetos*), Corncrake (*Crex crex*), Horned Lark (*Eromophila alpestris*) etc. In the canyon areas, some of the most affected species would be White-throated Dipper (*Cinclus cinclus*) and the Gray Wagtail (*Motacilla cinerea*).
4. Balkan chamois (*Rupicapra rupicapra balcanica*) is in the Appendix IV of the Habitat Directive as a species which is in need of urgent protection and it occupies the river canyons of the NP Sutjeska. Balkan chamois would be threatened not only by the loss of habitat but also by the harassment during the build up of the SHPP.
5. River Sutjeska is home to otters (*Lutra lutra*) which are listed in the Appendix II of the Bern convention, Appendix I of the CITES convention, Appendix I of the Bonn convention and in the Appendix II, IV and V of the EU Directive on habitats and species. There are no certain information on the number of otters in Bosnia and Herzegovina but is generally assumed to be in low numbers, meaning it should be classified as a critically endangered species (CR). The otter is a permanently protected species according to the hunting laws of the Federation of BiH and Republic of Srpska.
6. The rivers of NP Sutjeska are home to endemic species of *Plecoptera*, whose survival would be gravely endangered by the construction of the SHPP:
 - *Leuctra hippopides* Kačanski & Zwick, 1970 endemic to the Dinarids
 - *Leuctra olympia* Aubert, 1956 endemic to the Balkans
 - *Sinoperla neglecta graeca* (Aubert, 1956) endemic to the Balkans*Leuctra olympia* is protected by the Regulation of the Red list of the protected species of flora and fauna of Republic of Srpska (Official Gazette of RS, number: 04/1-012-2-2848/12).
7. The rivers of NP Sutjeska host endemic species of *Trichoptera*, whose survival would also be endangered by the construction of the SHPP:
 - *Hydropsyche mostarensis* Klapalek endemic to BiH
 - *Ryachophila loxias* Schmidt endemic to the Balkan
 - *Ryachophila balcanica* Rad. Endemic to the Balkan
 - *Micrasema sericeum* Klapalek endemic to Balkan*Hydropsyche mostarensis* is protected by the Regulation of the Red list of the protected species of flora and fauna of Republic of Srpska (Official Gazette of RS, number: 04/1-012-2-2848/12).
8. Construction of a SHPP in the NP Sutjeska is in conflict with the decision made in the COP 11 of the Convention on Biological Diversity, in a part concerning inland waters. All of the decisions and conclusions are binding to BiH.
9. NP Sutjeska has the potential to be places on the list of UNESCO's world heritage sites as an area of exceptional landscape and biological values. Construction of a SHPP diminishes it's eligibility.



10. Complex Maglic-Volujak-Zelengora (BA0000009) and Skakavac waterfall (BA0000015) are on the list of proposed Emerald area (Council of Europe, No. T-PVS/PA (2011) 06). The Emerald Network is an ecological network comprised of Areas of Special Conservation Interest (ASCI), and creation of the network is mandatory for all countries that are party to the Bern Convention. The network includes areas of great ecological importance for threatened species and habitat types that are protected under the Bern Convention. The Emerald Network programme was initiated by the Council of Europe as part of its activities in the implementation of the Bern Convention.
11. The construction of the MHP would destroy a vast potential for sport and adventure activities in the NP Sutjeska. Canyoning is at the moment offered to tourists in the canyon of the river Hračvka and should be developed in other rivers as well. Future development of this aspect of tourism is justified by the growing interest of tourists and by the big potential of the rivers of Sutjeska – Hračvka and Jabušnica for adventure activities. National Geographic magazine has in 2012 listed Bosnia and Herzegovina among top 10 countries in the world for adventure tourism. Sutjeska, as the biggest National park in BiH should definitely be developed with this in mind, which would be impossible with construction of the SHPP.
12. The canyons are a symbol of the NP Sutjeska, especially the canyon of the Sutjeska River, which can be seen on the NP Sutjeska logo.
13. Up building of this SHPPs has no economic gain which would justify their construction in the area of the National park. Altogether "Sutjeska 2A", "Sutjeska 2B", "Hračvka 1", "Hračvka 2" and "Hračvka 3" have less than 15 MW of installed capacity, which is almost no profit at all when compared with the damage which they would cause.
14. All of the data concerning the usefulness of the construction of the SHPPs in BiH are based on data gained from studies which are older than 20 years. In the meantime, due to the effects of climate change the regime and amount of water flow has changed drastically, which raises doubts about the economical justification of the most SHPP projects in BiH.
15. The highway Foča-Tjentište-Gacko passes through the canyon of Sutjeska river. With the construction of the pipeline and other facilities of the SHPP a dramatic degradation of the landscape values of NP "Sutjeska" would occur.

Due to all those reasons, we are demanding the breaking off the contract for the concession of SHPP in National Park Sutjeska.

As interested parties in this process, please inform us at the time about the public hearings that will be organised for the Environmental Impact Assessment and Spatial Plan for the NP Sutjeska that are in the procedure.

Sincerely,