

Update paper regarding the Nenskra hydropower plant (Georgia)

Possible threat to “Svaneti 1” candidate
Emerald site (GE0000012)

For more information

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We would like to express our gratitude to the Standing Committee regarding the great effort of the Bureau and Secretariat to ensure a professional and objective assessment of the risk for the Svaneti 1 Candidate Emerald site threatened by the decision of the Georgian government to reduce its size for construction of the 280 MW Nenskra Hydro Power Plant (HPP) project. The outcomes of the Emerald Biogeographical Seminar for the South Caucasus that took place on 8–9 November 2017 demonstrate that the size of Svaneti 1 is vital for ensuring sufficient protection of endangered species such as brown bear and lynx. The conclusion of the seminar also confirmed the concerns about the serious risks brought by the Nenskra HPP project, which is incompatible with the protection needs of the Emerald site.

We therefore appeal to the Standing Committee to take into consideration the urgency of the case and to recommend to the European Commission and European public banks to postpone their consideration of the project. The approval of a loan for the dam construction is currently scheduled by the European Bank for Reconstruction and Development (EBRD) for 13 December 2017. We look forward to forthcoming steps planned by the Bern Convention that will further assess the impacts on the site resulting from the Georgian government’s decision to decrease the size of the Emerald site and allow construction of the dam. We would like to recall that the official conclusions of the Biogeographical seminar planned for February 2018 and that the Bureau will review the case at a forthcoming meeting in March 2018. One site visit is also proposed in 2018. The EBRD, a bank that has committed to apply the Bern Convention, should postpone its lending decision in order to take into consideration the outcomes of the Bern Convention’s decision making processes.



Nenskra HPP reservoir site



Nenskra Dam site

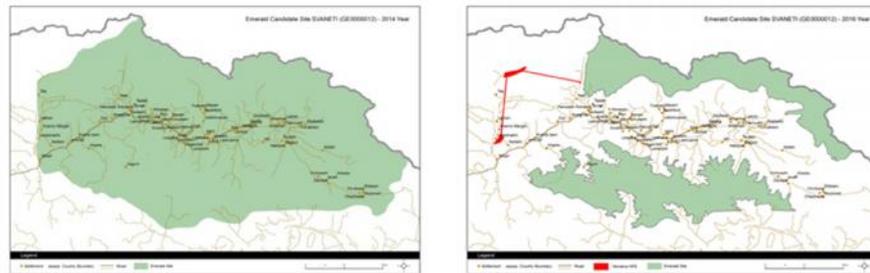
Nenskra HPP project impacts on the Svaneti 1 Emerald site

The project assumes the construction of a 130 metre high dam and flooding the Nenskra river 5.5 kilometres upstream of the village of Tita (Chuberi community). To increase the reservoir’s volume, a 12.4 km long tunnel should divert water from the Nakra river on the other side of the mountain close to the village of Nakra. A 15.1 km long tunnel should bring the water from Nenskra dam to the powerhouse, thus leaving approximately 35 km of the

Nenskra and Nakra rivers with almost no water. New access roads to upstream villages and a new power transmission line will also be built as part of the project.

The Ministry of Environment already granted an environmental permit for the project in October 2015.

In January 2016 the Georgian government decided to exclude from the Emerald Site GE0000012 "Svaneti 1"¹ all territories that are part of the valleys of the Nenskra and Nakra rivers which are relevant for the HPP's construction. The proposal disregarded procedures² for an evaluation of the sufficiency of the proposed areas and justifies the exclusion with significant anthropogenic impacts on the site.



The Emerald Site GE0000012 "Svaneti 1" site before and after the the change proposed by the Georgian government.

On 24 October 2016 Green Alternative submitted a complaint to the Bern secretariat regarding the Georgian government's violation of the articles of the Bern convention (Article 4, points 1 and 2, Article 5 and Article 6) by giving permission to build the Nenskra HPP and destroying significant protected habitats and species³ situated in the Emerald Site GE0000012 "Svaneti 1".

A project summary document published on the EBRD's website claims that "The Sponsor adopted a precautionary approach and has assessed the project both as if it is located within and outside a protected area"⁴, while the authors of the environmental and social impact assessment (ESIA) for the Nenskra HPP and the Supplementary Package claim that "habitats present in the area are not considered to be highly threatened or unique ecosystems", and that "habitats present had been subject to grazing and logging; leading to degraded habitats".

Biogeographical seminar in Tbilisi

On 8–9 November 2017 a Biogeographical seminar was held in Tbilisi to assess the sufficiency of the Emerald network in the three countries of South Caucasus for protecting species and habitats of European importance. The Georgian government has decided to significantly reduce the Emerald sites of Svaneti and Ratcha, and has proposed to compensate for them with many other smaller sites.

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1 Emerald Site GE0000012 "Svaneti 1" was as adopted at the Biogeographical Seminar held between the 27th and 29th of May 2015.

2 Procedure for evaluation of sufficiency of Areas of Special Conservation Interest (ASCIs) under the Bern Convention, adopted by the Standing Committee in 2013 (T-PVS/PA (2013) 13).

3 Species protection approved with Resolution No. 4 (1996) and Resolution No. 6 (1998) of the Standing Committee;

4 <http://www.ebrd.com/work-with-us/projects/psd/nenskra-hpp.html>

The gathered experts concluded that the reduction of the two sites in the West Caucasus has brought about insufficient protection for seven species and 15 habitats, even if the newly proposed small sites will be added as protected territories. These developments are especially concerning for the brown bear, lynx, greater horseshoe bat and the Alpine longhorn beetle. The ‘sufficient’ status of 2015 was changed to ‘insufficient moderate’, which means that new sites or the extension of existing sites should be proposed by the country.



Species within the Nenskra HPP site

Protection for beech and fir forests, riverine scrub and alder galleries along the rivers has also been compromised.

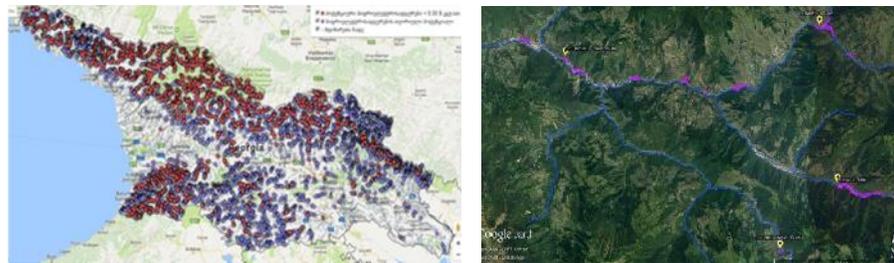


Habitats within the Nenskra HPP site

The Nenskra HPP project – not a single case but systemic issue of habitats and species degradation in Georgia by HPPs

The Nenskra HPP project is just one of the over 120 planned HPP projects in biodiversity sensitive areas. The impacts of these HPPs in the Western Caucasus region have been poorly assessed or overlooked completely. As with the Nenskra dam, the 185 MW Shuakhevi HPP has been funded by the EBRD and the Asian Development Bank (ADB), who have claimed that all biodiversity impacts have been effectively mitigated through supplementary studies. On site analyses of the already constructed Shuakhevi HPP show shocking results.

The total area of destroyed habitat will be around 170 ha, without taking into account the impacts downstream of the Shuakhevi powerhouse and on the Chorokhi Delta (an Important Bird Area and Emerald site). The delta has already been severely impacted by other HPP projects, and the Shuakhevi HPP will have a significant cumulative impact.



Planned HPPs in Georgia

Shuakhevi HPP impact area

Despite proposed offsetting or compensation for forest habitats ("The forest creation scheme will include the planting of 9.2 ha of mixed species forest"), the tree planting was not done before the habitats were destroyed as is required according to EU directives. The forest offsetting/compensation will not be able to create habitats with similar ecological functions as the destroyed habitats provided. The total area of habitats lost as a result of the Shuakhevi HPP project is several times higher than assessed. Moreover, the loss of key river and riparian habitats was also not offset or compensated, as it is impossible to create a new river. Grassland habitats were not restored, and furthermore some additional areas were destroyed during forestation activities.

Even before the Shuakhevi HPP has commenced operations, fish populations as well as the Eurasian otter have become almost completely extinct for several kilometres below the two dams and the weir. The fish species could not survive the poisoning with chemicals and the changes in water quantities and quality, as was pointed out by all local people.

In three days our experts found along the river shores traces of six different individuals of brown bear, a pack of four wolves, we heard at least three golden jackals, one Eurasian nightjar, four Caucasian rose finches and saw one kingfisher and one red-breasted flycatcher, demonstrating that the river shores are a biodiversity hotspot yet no offsetting is possible, as there is no 'free' space for the creation of new rivers. ***The Shuakhevi HPP case clearly reveals what similar problems can be expected from the Nenskra HPP, despite the claims of the banks that all impacts will be properly mitigated.***

Recommendations

We would therefore like to ask the Standing Committee to make a political appeal to the EC services, the EBRD as well as to other interested international financial institutions such as the ADB, the European Investment Bank and the Asian Infrastructure Investment Bank not to fund the Nenskra project and to delay funding approval for the project until the case is closed by the Bern Convention Standing Committee. We believe that the steps taken so far by the Bern Convention are of key importance for preserving the Georgian and European Natural heritage.