

INDEPENDENT REVIEW of ENVIRONMENTAL IMPACT ASSESSMENT ANALYSIS and PERMITTING PROCESS for PROPOSED HYDROPOWER CONSTRUCTIONS in VALBONA NATIONAL PARK, ALBANIA

In March 2016, a team of independent Albanian experts and recognized authorities reviewed two sets of documents – including the Environmental Impact Assessments (EIAs) – submitted to the National Environmental Agency (NEA) in order to obtain environmental permits for 11 hydropower projects (HPP) on the Valbona River (there are in fact an additional 3 plants not covered by these documents). They found numerous problems, which they summarized in a 25 page document focusing on just 2 of the hydropower plants, licensed to the Dragobia Energy Company, although the observations applied to both sets of documents, and all 11 plants. The following is a summary in English of their findings.

- The original independent report, in Albanian or English, is available on request.
- The original permitting documents can be viewed in Albanian at these links:

Dragobia Energy Company:

https://www.dropbox.com/sh/3xapd0bzmh4avxx/AADbS8IC0rtXln5331cfx_e6a?dl=0

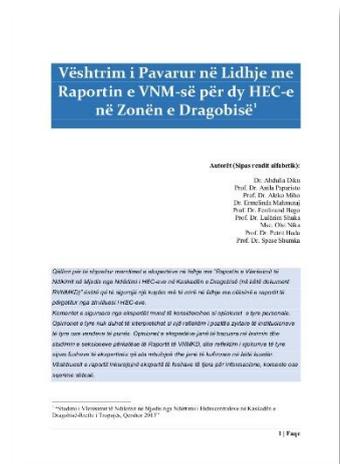
Valbona Project Company:

<https://www.dropbox.com/sh/sbl7y58o6ihthtq/AACtE4uSy8syrv9yx4c8Aqlaa?dl=0>

SUMMARY:

The authors initially list ‘findings’ to which they object, summarized as follows:

1. The EIA fails to list Red List species of mammals, fish, reptiles and amphibians known to occur in Valbona River, which are legally protected in Albania.
2. The description of vegetation and fauna are very general and given in layman’s terms, nor is the origin of the information stated. There is no concrete listing of habitat types, no recognized scientific definitions are used, and species which are mentioned specifically do not in fact occur in the area.
3. It is not possible to determine whether the authors of the EIA actually visited the area, or whether they collected any data in situ, as the data which is given is very general, and no sources or references are given. There also appears to be a lot of copy-paste plagiarism from other EIAs.
4. There is no data given regarding basic measurements of seasonal flow, water condition, oxygen content, conductivity, pH, turbulence, or nitrogen and phosphorus content. Thus there are no parameters mentioned which could be measured in order to assess ongoing impacts or change.
5. No mention is made of how much water will actually remain in the river bed, which is a basic and crucial aspect of addressing impact. Nor is any program put forward for monitoring and assuring that this flow is maintained.
6. No mention is made of sediment flow, the disruption of which will have long term and distant effects on the whole Valbona River system.



7. No mention is made of potential changes in air humidity and habitat temperature due to the anticipated changes in evaporation and pulverization coefficients.
 8. EIA data sources are either unreferenced or incorrect, and conclusions based thereon are flawed.
 9. General impact is underestimated or in some cases ignored. There is insufficient analysis of the impact of water flow changes on biodiversity, including a failure to consider impact on biotic composition, life cycle effects, and the need for lateral habitat connections.
 10. The permitting documents refer only to engineering aspects, and make no mention of alternative models considered, or differing impacts. Thus choices made in design do not seem to be based on careful consideration of alternatives.
 11. Public consultations did not meet legal requirements.
 12. Stakeholders were not informed about either the project itself, the EIA process, or public consultations.
 13. The impact analysis does not make any assessment of the effect on tourism and local economics.
 14. No assessment is offered of "Ecosystem Services" or the economic value and potential of forest resources, species richness, tourism, education or other secondary and derivative values which may be affected.
 15. The EIA makes no reference to (or consideration of) the fact that the construction will take place within a National Park, with concurrent special considerations and concerns.
 16. The EIA refers throughout incorrectly to the location of the projects as "Tropoja Municipality" whereas the actual location was at the time "Margegaj Municipality." In context as written, the authors were unaware of the actual location of the project.
 17. The legal basis referred to in the EIA is outdated, referring to laws which at the time of drafting had been amended or replaced by new laws. Therefore the EIA did not have a legitimate legal basis.
 18. The authors of the independent report, based on their own expertise, have reason to believe that HPP would have significant impact on terrestrial and aquatic flora and fauna of the area, which reasons are not mentioned nor addressed in the EIA.
 19. For a document whose purpose is to assess impacts and formulate measures to minimize these, the EIA makes very little mention of concrete impacts, and no mention of how these impacts will be minimized or monitored.
- Following these issues and analysis, the authors include a list of more than 50 endemic or sub-endemic plant and animals species known to occur in the area which are either officially endangered and/or appear on the Red List, which are legally protected under Albanian law, and which are not mentioned in the EIA.
 - The independent authors further note that the Environmental Permit granted in 2013 had an effectiveness of two years, and thus expired in 2015.

For these reasons, the independent experts conclude that the documents submitted fail substantially to make a systemic analysis of impacts which will be created by the HPP constructions, and do not adequately plan for mitigation measures. They give it as their opinion that these serious shortcomings in planning demand a readdressing of the projects by the Albanian government, particularly given the legally recognized biological importance and sensitivity of the area as a National Park.

Summary created and provided by:

