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**GREEN ISTRIA COMMENTS
ON DRAFT OF THE EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT STRATEGY
FOR CROATIA
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We welcome the opportunity to comment on the draft EBRD Country Strategy for Croatia. We offer our input on the development of tourism in Brijuni Islands that EBRD considers supporting as expressed in the draft strategy. Brijuni Islands have been central to our concerns and activities aimed at nature conservation.

The **Brijuni islands** became a **National Park** in the 1980s. Based on the definition of the International Union for the Conservation of Nature, a National Park has to ensure ground for spiritual, scientific, educational, recreational and leisure visits in harmony with the environment. Zelena Istra considers that Brijuni National Park should be managed with the aim of adopting the relevant strict international standards and legislation on National Parks. Unfortunately, private interest – not in accordance with the adopted legislation of nature protection - is gaining the advantage, and the suspicion is growing that instead of being placed under maximum protection, nature will be diminished to make profit. Golf tournaments, polo tournaments and planned new housing capacity cannot be in accordance with the adopted nature preservation legislation, and this is exactly the definition of “upgrading” being used for the islands. Zelena Istra considers that Brijuni National Park, just like all the other National parks in the world, should be a destination for sustainable tourist excursions based on one day visits, not for large elite tourism developments.

Developing the Brijuni Riviera Project

The study “Koncept najbolje uporabe za odabrane lokacije za projekt Brijuni rivijera” (“Concept of best practice for the chosen location of Brijuni Riviera project”) made by Horwath Consulting Company was well hidden from public until local daily newspapers started writing about it. A daily newspaper published an article about the negative opinion of a study by the Governmental Council for Spatial Planning. Although it is a project of potentially high impact on the population and environment of the southern Istria region, during the project development the investors and planners completely forgot about reaching a public consensus. By excluding the public from the processes of decision-making a general fear of negative impacts and opposition by citizens was spontaneously developed. Nowadays tourism can develop in two ways: one is by destroying its own basis – natural resources - and the second is by protecting its own grounds. Economic (tourist) growth can be classified as a product of the expenditure of natural resources. The conclusion is that the environment should be preserved for the future and it is a crucial part of sustainable development. The development scheme offered for Brijuni Rivijera is based on an unsustainable way of using natural resources and the coast. Bale Municipality (close to Brijuni islands) has offered a good and sustainable way of managing the coast (with a spatial development concept for urbanization and a high level of protection of

natural resources) which is based on the consensus of interested parties – including citizens. It is unclear how the concept development process of a National Park area can be of worse quality than other local ones.

EBRD involvement in the Brijuni Riviera Project

In the page 26 of the draft Country Strategy, the EBRD states that: “In addition the Bank welcomes the opportunity to support the redevelopment and upgrading of tourism facilities on Brijuni Island and the Brijuni Riviera project.”

The current deficiency of legislation in Croatia on public participation and EIA procedures should not be an obstacle in identifying the environmental sustainability of the project. We therefore recommend that the EBRD Country Strategy invites the Croatian authorities to abide by the highest international standards on public participation and EIA in development of the project.

If the EBRD demonstrates an interest to support the project financially, Zelena Istra expects that the Brijuni Rivijera development will be appraised and operated at the minimum according to the EBRD standards.

Municipal and environmental infrastructure

We recommend that the EBRD Country Strategy invites Croatian authorities to present technically, economically and environmentally appropriate and modern concepts for municipal infrastructure developments instead of obsolete concepts approved without public announcements or hearings (as it happens with Pula Waste Water Development Project which passed the EBRD review: instead of a long term sewerage and waste waters treatment solution, The MEIP is aimed at repairing the old infrastructure and it was planned on basis of an old sewerage treatment study from 1978).