

Dear President Chakrabarti, Dear Executive Directors of the EBRD,

Nature impact assessment gives grounds for the EBRD to finally withdraw from the Ombla hydropower project

When the EBRD's board approved the Ombla hydropower project in November 2011 - before the project's environmental impacts had been properly assessed or publicly consulted - it did so on the condition that the project promoter, Croatian electricity company HEP, carried out an assessment of the project's impact on flora and fauna of the *Vilina Cave – Ombla Spring* protected area. This assessment has now been carried out and confirms that the site in question is among the most diverse such habitats in the country and beyond.

The research shows that **the construction of the Ombla hydropower plant would have irreversible and long-lasting impacts on the *Vilina Cave – Ombla Spring* system and could permanently destroy habitats that are set for protection as part of Croatia's future Natura 2000 network** and already form part of the country's National Ecological Network. **While some mitigation measures exist for certain individual species, the effectiveness of these measures are unknown, and no mitigation is possible for habitats as a whole.**

To be more specific, in the study altogether 68 cave species were identified, of which almost all are endemic to the Southern Dinaric region in southern Croatia and Western Bosnia, and many are endemic to the narrower region around Dubrovnik . The study finds as many as 14 species are endemic to the *Vilina Cave – Ombla Spring* site alone.

However, **rather than admitting that potentially wiping out tens of endemic species and destroying critical habitats means the project cannot go forward, the assessment concludes that the project will go on, garnished with some 'mitigation measures'** which are almost amusing in their naïvety, such as making a new concrete cave for some of the species to live in.

Such damage might, according to Croatian law and the EU Habitats Directive, be justified - but only if the project is of overwhelming public interest. If the project brought exceptional economic and social benefits, then it could potentially go forward in spite of the damage to the environment. However the Ombla hydro plant looks set to bring neither, as civil society organisations have outlined in previous letters to the bank.

We would also like to point out that **the assessment which has been carried out has not been done within the framework with the Croatian Law on Nature Protection, and thus is not part of any legal framework.** It is disappointing that an international institution which claims to promote European standards has supported such piecemeal

solutions in which there is now no clear legally defined procedure for taking public comments into account or on who takes the decision on approval of the study. The EBRD learn from the chaotic back-to-front project approval process at the bank for this project, in which board approval happened before an extremely important element of the appraisal, and ensure that it is not repeated with other projects.

With the damage that the Ombla project will inflict on critical natural habitats, along with its questionable economics and the skewed consultation process to date, it is high time for the EBRD to look at the evidence and withdraw from the Ombla hydropower project.

Yours sincerely,

Bernard Ivčić
President
Zelena akcija / FOE Croatia
On behalf of the organisations listed below

Brodsko ekološko društvo-BED	Slavonski Brod
CEE Bankwatch Network	Praha, Czech Republic
Centar za građanske inicijative Poreč	Poreč
Centar za mirovne studije	Zagreb
Centar za životnu sredinu	Banja Luka, BIH
EKO – Orosavlje	Orosavlje
EKO centar Zeleno Sunce	Dubrovnik
EKO PAN	Karlovac
Eko-Eko	Opuzen
Eko-Omblići	Dubrovnik
Ekološka udruga Krka Knin	Knin
ETU Šolta	Šolta
FADE IN	Zagreb
Friends of the International	Amsterdam
GONG	Zagreb
Građanska inicijativa "Spasimo Omblu i njezine stanovnike"	Dubrovnik, Croatia
Hrvatsko biospeleološko društvo	Zagreb
Inicijativa SRĐ JE NAŠ	Dubrovnik, Croatia
Institut za ruralni razvoj i ekologiju	Gradec
Justice and Environment	Brno
KINOOKUS	Dubrovnik
Klub prijatelja Lokruma	Dubrovnik
Koalicija udruga u zdravstvu - Coalition of Associations in Healthcare	Zagreb
Kuća ljudskih prava	Beli Manastir
Mirovna grupa OAZA	Wien, Austria
ÖKOBÜRO - Koordinationsstelle österreichischer Umweltorganisationen	
PIC	Ljubljana, Slovenia
Pravno-informacijski center nevladnih organizacij - PIC	Ljubljana, Slovenija
Pronatura	Bern, Switzerland
Speleološka udruga Vjetrenica - Popovo polje	Popovo polje
SUNCE	Split

Udruga Mobbing
Udruga SMART
Udruga za nezavisnu medijsku kulturu
Volonterski centar
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