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**Outgoing No.034**  
**March 17, 2009**

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### **Comments to the Moinak Electricity Transmission Project**

The Ecological Society Green Salvation is deeply concerned about the Moinak Electricity Transmission Project, P114766. The joint-stock company “Kazakhstan Electricity Grid Operating Company” (KEGOC) has applied to the World Bank (WB) for project financing. However, the project violates a number of legal requirements of the Republic of Kazakhstan (RK) and the WB’s operational policy.

The Moinak Electricity Transmission Project is designed to connect the existing electric networks with the 300 megawatt Moinak HPP on the Charyn River in the Raimbek district of the Almaty region, and comprises two components:

- Extension and upgrading of the 220kV Shelek substation (SS) and 220 kV Sary-Ozek SS and construction of 220kV Outdoor switchgear at Moinak HPP;
- Construction of 220 kV OHTL Moinak HPP – 220 kV Shelek SS (119,1 km) and 220 kV Moinak HPP – 220 kV Sary-Ozek SS (214,7 km), cross connection 220 kV OHTL at 220 kV Sary-Ozek.  
(<http://web.worldbank.org/external/projects/main?pagePK=64283627&piPK=73230&theSitePK=40941&menuPK=228424&Projectid=P114766>)

The Environmental Management Plan submitted by KEGOC to the WB specifies that the two designed 220 kV OHTL will cross the Charyn and Altyn-Emel national parks. KEGOC states that: “Partial transit of OHTL through the territory of Charyn and Altyn-Emel natural reserves will not affect negatively their flora and fauna. Almost all the way the line passes the lands classified as grazing land”.

([http://www-wds.worldbank.org/servlet/WDServlet?pcont=details&eid=000333037\\_20090129002752](http://www-wds.worldbank.org/servlet/WDServlet?pcont=details&eid=000333037_20090129002752))

**However, the laws of the Republic of Kazakhstan (RK) prohibit the construction of power system objects (OHTL) on natural protected areas (NPA) which include national parks, and this is not specified in the KEGOC documents.**

The Law of the RK dated July 7, 2006 No. 175-III on “Natural Protected Areas” prohibits any non-complying activities in the NPA (article 23). The rules of protection and use of territory and protected areas belonging to the state national natural parks prohibit any economic activity which is not related to the park’s operation and protection and which negatively affects its ecological

systems (Law of the RK No. 175-III, articles 45 and 48). The same prohibition is applied by the Land Code of the RK dated June 20, 2003 No. 442-II (article 123) and other regulations of the RK.

The designed OHTL will cross the Charyn canyon, a natural area of national importance which is under special protection and is listed as land having special ecological and scientific value according to the resolution of the Government of the RK No. 657 dd. June 30, 2007. Moreover, the project was not submitted for approval to the Forestry and Hunting Committee of the RK – a special state authority governing NPA (Letter of FHC No. 25-02-09-25/651, dated 25.02.2009).

**The project violates the WB's Operational Policy – Natural Habitats:** The Bank does not support projects that, in the Bank's opinion, involve the significant conversion or degradation of critical natural habitats (OP 4.04, clause 4).

Natural habitats of critical state include national parks (OP 4.04, Annex A, clause 1.b). The Charyn and Altyn-Emel national parks are habitats for many rare and endangered species listed in Kazakhstan's Red Book.

The Charyn Park is home to 2 amphibian species, 1 reptile species, 22 bird species and 8 mammal species (<http://www.gis-terra.kz/services/oopt/service/eho/charyn2005>). Two fish species, 2 amphibian species, 1 reptile species, 11 mammal species and 28 bird species live in Altyn-Emel (passport of the State National Nature Park "Altyn-Emel", Annex 1).

**The Government of RK included the Altyn-Emel national park into the tentative list of objects to be submitted for inscription on the UNESCO World Heritage List** (<http://whc.unesco.org/en/tentativelists/1682/>). The OHTL construction and operation will adversely affect the habitat and migration routes of the species mentioned above. Additionally, the OHTL will visually damage the unique mountain and plain landscapes of the area which are highly attractive for tourists.

Therefore, the Ecological Society Green Salvation calls on the World Bank to:

1) Decline to finance the project violating national laws and threatening the ecological integrity of NPA, or offers the borrower (KEGOC) to develop alternative routes for OHTL which would not impact the Charyn and Altyn-Emel national parks.

The Ecological Society Green Salvation is aware that the KEGOC documents specify the second option to construct 220 kV OHTL Moinak HPP – 220 kV Sary-Ozek SS (279,7 km) bypassing the Altyn-Emel area (letter of the Almaty Region Office of Environmental Protection No. 03-647 dd. 26.03.2007). But this option is not included in the application of KEGOC submitted to the WB.

2) Rank the project as an "A" category project by the World Bank classification, as the 220 kV OHTL is an object of increased danger. The 220 kV OHTL requires a special passageway and a protection zone to avoid accidents and the adverse effect of an electromagnetic field on human health ("Rules of protection of electric mains with voltage of more than 1,000 V", resolution of the Government of the RK No.1436 dd. 10.10.1997). Annex I (clause 17) of the Aarhus Convention states that the 220 kV OHTL construction is an activity which can have significant environmental effects. The Aarhus Convention was ratified by the RK in 2000.

The Ecological Society Green Salvation would also bring the World Bank's attention to the fact that the Moinak HPP project features serious ecological problems. The Moinak HPP construction will result in the regulation of the Charyn river flow, thus breaking natural hydrological conditions and adversely affecting the ecosystems of the Charyn national park and the state nature reserve "Charyn Ashen Grove" of national importance. Decision of the construction was made with violations of national rules and requirements. The European Bank for

Reconstruction and Development and the World Bank have previously declined to finance the project (<http://www.bankwatch.org/project.shtml?w=162059&s=1964147>).

Therefore, the World Bank should meticulously assess the project and the information provided by the borrower (KEGOC), as the current project version will only worsen the ecological problems which are arising as a result of the Moinak HPP construction. The discussion of the project with the concerned public of the RK already violates clauses 2, 3 and 4 of article 6 of the Aarhus Convention.

Sincerely,



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On behalf of Green Salvation

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