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TO:

Alistair Clark

Corporate Director
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Bulgaria:

Centre for Environmental
Information and Education
(CEIE)

For the Earth!

Czech Republic:

Centrum pro dopravu a
energetiku
Hnutí Duha

Estonia:

Estonian Green Movement–FoE

Georgia:

Green Alternative

Hungary:

Nature Protection Club of
Eotvos Lorand University (ETK)
National Society of
Conservationists–FoE (NSC)

Lithuania:

Atgaja

Macedonia:

Eko–svest

Poland:

Polish Green Network (PGN)
Institute of Environmental
Economics (IEE)

Russia:

Sakhalin Environment Watch

Slovakia:

Friends of the Earth – Center
for Environmental Public
Advocacy (FoE–CEPA)

Ukraine:

National Ecological Centre of
Ukraine (NECU)

CEE Bankwatch Network's
mission is to prevent
environmentally and socially
harmful impacts of
international development
finance, and to promote
alternative solutions and public
participation.

13 September, 2010

Dear Mr Clark,

I'm writing to you to express concerns regarding Ukrenergo's implementation of the already approved Rivne Kyiv High Voltage Line Project that will impact the Urochische Mutvytske landscape reserve of national importance.

The decision to route the line through this protected natural area, in our view, amounts to a significant change from the approved project and as such requires an additional environmental impact assessment in line with the EBRD's Environmental and Social Policy. In particular, we would like to see an alternative routing solution found for projected lines within the Makarivsky region of the Kyiv oblast in order that they be safe for the local people and for the nature of this region.

NECU/CEE Bankwatch Network has already drawn your attention to issues concerning the Rivne Kyiv High Voltage Line Project during the EBRD Annual Meeting in Zagreb in May this year. Since then, however, the situation has not changed.

Ukrenergo has not yet received the land use approvals from the local authorities required to construct electricity pylons along the initially planned route. Thus in the case of Korolivka village in the Makariv district of Kyivska oblast, the village council did not approve the proposed route along the western border of the village, but has insisted on the company using an alternative version of the route that runs at far from the village but through the Urochische Mutvytske landscape reserve of national importance. Given the legal status of this type of protected area, and that such construction involving serious interference with forests is prohibited, on 9 July 2010 the State Directorate for Nature Protection in Kyiv Oblast recalled its previously issued conclusion on land acquisition in the Makariv district.

The position taken by the Korolivka council is understandable and was provoked by the fact that the initial project design disregarded the

interests of Korolivka's inhabitants. The already existing and operating 750 kV transmission line (Chornobil NPP–Vinnitsa) runs close to the western edge of the village (unfortunately the EIA overlooks this entirely) and two new 750 kV lines are planned within the same corridor. Moreover, one more 330 kV double circuit diversion connecting Kyivska substation with TL Chornobyl NPP – Severnaya (also not mentioned in the EIA) will also be constructed in the same corridor, meaning villagers may end up with three 750 kV and two 330 kV high voltage lines close to their homes and right above their land.

Such a concentration of high voltage lines at the minimal allowed distance from the village and above agricultural fields may impact on local people's health and livelihoods, and surely cannot be considered to be the best solution for an EBRD financed project. For example, the noise from the existing 750 kV line is already disturbing people in their homes at night. Obviously with the addition of more lines, the level of noise will increase – thus the affected people are opposing such additions.

Nevertheless, we consider the rerouting of the two 750 kV lines through the protected area to be unacceptable. In spite of the attempt to minimise the impact on the village, the proposed alternative route will require substantial cutting of the forest in the reserve – the passage required is roughly 120 metres wide. Furthermore, if constructed the transmission lines under the altered design will run for roughly nine kilometres along the small local River Kodra, and will undoubtedly spoil the picturesque and almost untouched landscape of its valley.

I attach several photos taken in May during one of the visits to the site.

Let me also once again draw your attention to the insufficient quality of the EIA for this project. Although the double circuit 330 kV diversion to Chornobyl NPP – Severnaya and the 330 kV Kyivska – Zakhidna transmission line (already being constructed) comprise an inseparable part of the project, they were not assessed by the EIA, and indeed were not even mentioned in the documentation. We can hardly believe that it was a mistake that the Urochische Mutvytske reserve was not mentioned as a protected natural protected area while presenting the alternative routing in the EIA (page 141, pic. 8.5 – Ukrainian version.)

In view of the above-mentioned information, we call on the EBRD to take appropriate steps to prevent its project from being harmful to the Korolivka community but also to the protected area, and to encourage your client NEC Ukrenergo to find a more appropriate alternative route and to engage – meaningfully – in additional assessment and public consultations.

I would also like to use the opportunity of this letter to welcome the recent progress in resolving the conflict situation in the villages of Usatove and Nerubayske.

The role that the EBRD has been playing in compelling Ukrenergo to adhere to the project design is very much appreciated and gives reason to believe that the controversial lines will be removed from the villages as per the Memorandum signed in June this year. All the same it is still premature to consider Ukrenergo as having undergone some kind of Damascene conversion that would merit the company receiving new financial support. Considering the project-specific controversies, as well as the still unresolved issues with the already financed Ukrenergo projects, we urge you not to recommend the South Ukraine Transmission Project for Board approval at this time.

Yours sincerely,
Iryna Holovko



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