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 naivety, 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  
CEE Bankwatch Network  
Centar za građanske inicijative Poreč  
Centar za mirovne studije  
Centar za životnu sredinu  
EKO – Orosavlje  
EKO centar Zeleno Sunce  
EKO PAN  
Eko-Eko  
Eko-Omblići  
Ekološka udruga Krka Knin  
ETU Šolta  
FADE IN  
Friends of the International  
GONG  
Građanska inicijativa "Spasimo Omblu i njezine stanovnike"  
Hrvatsko biospeleološko društvo  
Inicijativa SRĐ JE NAŠ  
Institut za ruralni razvoj i ekologiju  
Justice and Environment  
KINOOKUS  
Klub prijatelja Lokruma  
Koalicija udruga u zdravstvu - Coalition of Associations in Healthcare  
Kuća ljudskih prava  
Mirovna grupa OAZA  
ÖKOBÜRO - Koordinationsstelle österreichischer Umweltorganisationen  
PIC  
Pravno-informacijski center nevladnih organizacija - PIC  
Pronatura  
Speleološka udruga Vjetrenica - Popovo polje  
SUNCE  

Slavonski Brod  
Praha, Czech Republic  
Poreč  
Zagreb  
Banja Luka, BIH  
Orosavlje  
Dubrovnik  
Karlovac  
Opuzen  
Dubrovnik  
Knin  
Šolta  
Zagreb  
Amsterdam  
Zagreb  
Dubrovnik, Croatia  
Zagreb  
Dubrovnik, Croatia  
Gradec  
Brno  
Dubrovnik  
Dubrovnik  
Zagreb  
Zagreb  
Beli Manastir  
Wien, Austria  
Ljubljana, Slovenia  
Ljubljana, Slovenija  
Bern, Switzerland  
Popovo polje  
Split
Udruga Mobbing
Udruga SMART
Udruga za nezavisnu medijsku kulturu
Volonterski centar
Zelena Istra
Zeleni Osijek
Ženska soba

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