

## Babino Selo HPP, Bosnia–Herzegovina

For more information

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**O**n 3 May 2017 Bankwatch representatives visited the River Vrbas near Donji Vakuf, where Elektroprivreda BiH (EP BiH) is planning to build the Babino Selo hydropower plant. A grant of EUR 750 000 from the Western Balkans Investment Facility has been received for making a feasibility study including an Environmental Impact Assessment (EIA) study and the EBRD may be involved in financing the plant.

The visit consisted of a meeting with a group of representatives from angling associations,<sup>1</sup> followed by a field visit on foot from the point of the beginning of the reservoir all the way to the location of the powerhouse, where we spoke to three local people along the way.

### Project design

The first unclarity around the project is about its capacity. It would have an installed capacity of 6.17 MW according to the EP BiH website, or 5.12 MW according to a promotional flyer.<sup>2</sup> Despite its relatively small capacity, the plant would involve a dam of nearly 10 m high and almost 100 m wide, a derivation tunnel of about 900 metres and a reservoir of about 1000 metres long.

The scoping study states that other alternatives have been explored but this is the version that has been chosen. It is not clear what alternatives were considered and why was a 100-metre-wide dam considered to be optimal for just 5–6 MW of electricity?

### Critical habitat

The anglers' groups are very concerned about the plans. They stated that the stretch of the river around Donji Vakuf is home to the endemic Danube Salmon (*Hucho Hucho*) and that there is a spawning ground for Grayling (*Thymallus thymallus*) on the stretch around the planned power plant. *Hucho Hucho* is on the IUCN Red List, classified as Endangered<sup>3</sup> and is also considered Endangered on the national level.<sup>4</sup>

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<sup>1</sup> Sportsko ribolovno društvo Vrbas, Bugojno and Sportsko ribolovno društvo Vrbas, Donji Vakuf

<sup>2</sup> [http://www.donji-](http://www.donji-vakuf.ba/attachments/article/161/Babino%20Selo%20FS_Info%20letak.pdf)

[vakuf.ba/attachments/article/161/Babino%20Selo%20FS\\_Info%20letak.pdf](http://www.donji-vakuf.ba/attachments/article/161/Babino%20Selo%20FS_Info%20letak.pdf)

<sup>3</sup> <http://www.iucnredlist.org/details/10264/0>

<sup>4</sup> Projekat Šumskih i planinskih zaštićenih područja Broj: BA-FMPAP-TF091919-CQ-21-S-12/FBIH, Izrada crvene liste ugroženih biljaka, životinja i gljiva u Federaciji Bosne i Hercegovine; Knjiga 3 CRVENA LISTA FAUNE FEDERACIJE BOSNE I HERCEGOVINE, Nacr

The presence of *Hucho Hucho* is acknowledged in the Scoping Study for the Environmental and Social Impact Assessments for the project and it is stated that further research needs to be carried out, in late May or early June, to collect additional data about the spawning season. It is not clear whether this was carried out in 2016 or whether it is still pending.



The Vrbas river at the entrance to the canyon and the beginning of the planned reservoir

Even with the existing data, it seems clear that the site is a critical habitat according to the EBRD's Environmental and Social Policy 2014 (PR 6.14) on the following grounds:

- (ii) habitats of significant importance to endangered or critically endangered species;
  - (iii) habitats of significant importance to endemic or geographically restricted species;
- Hucho Hucho* is both endangered and geographically limited to the Danube basin.

What is worrying is the assumption in the Scoping Study that mitigation measures would be effective in minimising harmful impacts for *Hucho Hucho* and other fish and the presumption in favour of construction of the plant.

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izvještaja – Prijedlog, Sarajevo, 2013, cited in Scoping Study for Babino Selo hydropower plant: [http://www.donji-vakuf.ba/attachments/article/161/HPP%20Babino%20Selo\\_ESSS\\_final\\_BHS\\_20160401.pdf](http://www.donji-vakuf.ba/attachments/article/161/HPP%20Babino%20Selo_ESSS_final_BHS_20160401.pdf)  
 s [http://www.donji-vakuf.ba/attachments/article/161/HPP%20Babino%20Selo\\_ESSS\\_final\\_BHS\\_20160401.pdf](http://www.donji-vakuf.ba/attachments/article/161/HPP%20Babino%20Selo_ESSS_final_BHS_20160401.pdf), p.32

The mitigation measures mentioned are:

- The selection of project variant 1A as the one with the smallest reservoir (147 798 m<sup>3</sup>, length 900 m)
- Installing fish passes and installations for diverting fish away from entering the derivation pipes and turbines.
- Ensuring an ecologically acceptable residual flow in order to minimise hydrological changes.

After further research, it is stated that “As a result of this analysis, an action plan and biodiversity monitoring plan will be developed and agreed on” and that “In the ESIA phase, a series of mitigation measures will be prepared, in order to avoid, prevent or reduce as much as possible potential impacts on fish, with an emphasis on endangered species”.<sup>6</sup> Nowhere is it mentioned that construction could only go ahead in a critical habitat if a number of very specific conditions are met.

### Questions for the EBRD:

- 1) What project alternatives have been examined, and did these include non-hydropower alternatives or hydropower plants at completely different locations?
- 2) Has the planned additional research on *Hucho Hucho* been carried out? If so, what were the findings?
- 3) What is the EBRD’s experience with mitigation measures in the case of *Hucho Hucho* and *Thymallus thymallus*? Have there been examples where they have functioned properly?



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This briefing was produced with the financial support of the European Union and the EuroNatur Foundation. The content of the document is the sole responsibility of the CEE Bankwatch Network and does not reflect the position of the European Union.



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<sup>6</sup> Ibid. p.33, our translation