

13 March 2023

To: Mr Virginijus Sinkevičius, Commissioner for Environment
Cc: Ms Florika Fink-Hooijer, Director General for Environment
Mr Humberto Delgado Rosa, Director, Directorate D, Biodiversity
Ms Luisa Samarelli, Acting Head of Unit D.3
Mr Robert Konrad, Advisor for Biodiversity, Directorate D, Biodiversity

The Energy Community Treaty urgently needs stronger nature protection rules

Dear Commissioner Sinkevičius,

As civil society organisations from – or working in – the countries of the [Energy Community Treaty](#) – the Western Balkans, Georgia, Moldova and Ukraine – we have increasingly witnessed conflicts between energy infrastructure and nature protection in recent years. In particular, rampant hydropower construction has damaged rivers and streams in some of the most precious and pristine areas of our countries. This has attracted widespread public resistance, especially in the Western Balkans, Dniester River basin, and Georgia.

Yet there is still much to save. The Western Balkans and the Caucasus are global biodiversity hotspots, especially in terms of freshwater species. The regions' extensive mountains, river and lake systems, and coastline are home to numerous endangered species and important habitats with a high degree of endemism. Many of their rivers are still in good or pristine condition, but they are desperately under-protected.

Ukraine, Moldova and Georgia are among the countries with the best developed Emerald networks, but most sites are not adequately protected. And in Ukraine, the sites' condition has considerably worsened as a result of Russia's war. The Energy Community countries' Stabilisation and Association agreements and Association Agreements require them to enact EU nature protection legislation, but in many cases there are no clear deadlines for this.

At the same time, the energy transition is gathering pace. In December 2022, the Energy Community Ministerial Council [committed to 2030 targets](#) for greenhouse gas reductions, energy efficiency and renewable energy. This means that after decades of under-investment, we can expect to see more and more renewable energy facilities being built in our countries.

This is a welcome and necessary step towards tackling air pollution and climate change. But if not accompanied by adequate environmental protection safeguards, the construction of new energy facilities across the countryside has the potential to damage nature and generate widespread public opposition, as we have already seen with hydropower.

We cannot afford such a backlash to repeat itself and jeopardise the transition towards an energy-efficient economy based on sustainable forms of renewable energy.

We therefore ask the Commission to take urgent steps to include relevant parts of the Habitats, Birds and Water Framework Directives in the Energy Community Treaty.

NGOs have already made [similar requests](#) and [put forward concrete proposals](#), but the situation is becoming increasingly urgent. In November 2020, at the 21st Energy Community Environmental Task Force

meeting, a representative of DG Environment [outlined the Commission's plans](#) to include the relevant parts of these Directives in the Energy Community Treaty. However we have seen very little progress since then.

We are aware of the very valuable work being done by DG Environment with regard to the new Restoration Law, but it is also crucial to save the abundant biodiversity we already have in our region.

We therefore kindly ask for your attention to this matter and remain at your disposal for any questions you may have.

Kind regards,

Ms Pippa Gallop

Southeast Europe Energy Advisor and Finance and Biodiversity Strategic Area Leader,
CEE Bankwatch Network,

on behalf of the following NGOs:

1. Aarhus Center in BiH Bosnia and Herzegovina



2. Association of Young Ecologists of Niksic Montenegro



3. Association of Environmental Journalism and Ecological Tourism Moldova



4. Atelier for Community Transformation - ACT Foundation Bosnia and Herzegovina



5. Bird Protection and Study Society of Serbia Serbia



6. Black Sea Women's Club Ukraine



7. Brod Ecological Society-BED Croatia



8.	Center for Environment	Bosnia and Herzegovina	 Centar za životnu sredinu
9.	Center for Protection and Research of Birds (CZIP)	Montenegro	 CZIP
10.	CEE Bankwatch Network	Central and Eastern Europe	 CEE Bankwatch Network
11.	“Cellula” Biologists Association	Montenegro	 cellula
12.	Civic Alliance	Montenegro	 GRAĐANSKA ALIJANSA Civic Alliance - Alijanca qytetare
13.	Crvena, Sarajevo	Bosnia and Herzegovina	 UDRUŽENJE ZA KULTURU I UMJETNOST C R V E N A ASSOCIATION FOR CULTURE AND ART
14.	Da zaživi selo - Pljevlja	Montenegro	 NVO Da zaživi selo.
15.	“Dr. Stjepan Bolkey Center” Association	Bosnia and Herzegovina	 UDRUŽENJE CENTAR BOLKEY
16.	‘Ecoaction’ Centre for environmental initiatives	Ukraine	 eкодiя ecoaction.org.ua
17.	Ecoclub	Ukraine	 Екоклуб
18.	Ecological Movement of Moldova	Moldova	 Miscarea Ecologistilor din Moldova MEM
19.	“Eco-Tiras” International Association of River Keepers	Moldova	 ECO-TIRAS
20.	EcoZ	Kosovo	 ECOZ
21.	EDEN Center - Environmental center for Development, Education and Networking	Albania	 EDEN Environmental Center Education and Networking

22.	Eko akcija	Bosnia and Herzegovina	
23.	Eko forum Zenica	Bosnia and Herzegovina	
24.	Eko Gotuša	Bosnia and Herzegovina	
25.	Ekološko udruženje Eko Put	Bosnia and Herzegovina	
26.	Eko-svest Centre for Research and Information for the Environment	North Macedonia	
27.	Ekotim	Bosnia and Herzegovina	
28.	Eko Tvrtkovac	Bosnia and Herzegovina	
29.	Environmentally Responsible Action (ERA)	Kosovo	
30.	Environment Engineering Group	Serbia	 INŽENJERI ZAŠTITE ŽIVOTNE SREDINE
31.	EuroNatur	Europe	
32.	European Environmental Bureau	Europe	
33.	Expeditio	Montenegro	
34.	Fojničani Citizens' Association Maglaj	Bosnia and Herzegovina	

35.	Friends of Animals and Nature NGO	Moldova	NGO Friends of Animals and Nature, Moldova
36.	„Habitat” Public Association Agency for Regional Development (PA ARD)	Moldova	
37.	„Ibar“ Ecological Movement, Kraljevo	Serbia	
38.	ICO “Environment - People - Law”	Ukraine	
39.	International Center for Environmental Research	Georgia	
40.	Let’s Do It Peja	Kosovo	
41.	LIR Evolucija	Bosnia and Herzegovina	
42.	Montenegrin Ecologists Society	Montenegro	
43.	National Ecological Center of Ukraine	Ukraine	
44.	Organic Agriculture Association	Albania	
45.	Parks Dinarides - network of protected areas of the Dinarides	Montenegro	
46.	Planinarsko - smučarsko društvo “Perun”	Bosnia and Herzegovina	

47.	Prijatelji prirode Eko Element Bugojno	Bosnia and Herzegovina	
48.	RiverWatch	Austria/regional	
49.	Rzav Ecological Association	Serbia	
50.	“SANUS” Citizens’ Association	Bosnia and Herzegovina	
51.	Society for Birds and Nature Protection	Moldova	
52.	Ukrainian Nature Conservation Group	Ukraine	
53.	Women’s Association for the Environment Protection and Sustainable Development	Moldova	
54.	WWF Adria	Albania, Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, North Macedonia, Serbia and Slovenia	
55.	WWF-Ukraine	Ukraine	
56.	Young Researchers of Serbia	Serbia	
57.	“Za Doljanku” Association, Jablanica	Bosnia and Herzegovina	
58.	“Zeleni Neretva” Association, Konjic	Bosnia and Herzegovina	

59. Zero Waste Montenegro Montenegro



60. Zrcalo non-governmental association Montenegro

