

# Cutting hydropower subsidies – how are the Western Balkans doing?

*The small hydropower boom, which has damaged pristine rivers and streams across the Western Balkans, has largely been fuelled by generous feed-in tariffs. Here we take a look at recent progress towards changing the rules on renewables support in the region.*



*Komalj hydropower plant, Serbia. Photo by Nataša Milivojević, Ekološko udruženje Rzav*

In September 2019, we published our report *Who Pays, Who Profits?*,<sup>1</sup> which revealed that between 2009 and the end of 2018, at least 380 small hydropower plants (below 10 MW) were built in the Western Balkans, bringing the total number of installations to at least 488. This boom was fuelled by feed-in tariffs, which had been disproportionately directed towards hydropower.

In fact, in 2018, small hydropower received around 70 per cent of renewables incentives but generated only 3.6 per cent of overall electricity.

Feed-in tariffs have been widely used across Europe to stimulate the growth of renewable energy, as they guarantee the purchase of electricity from a certain number of electricity producers at a fixed price, set high enough to offer an investment incentive.

For more information

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<sup>1</sup> CEE Bankwatch Network, [Who Pays, Who Profits?](#), September 2019.

But instead of using them to attract investments in new technologies and bring down their costs, Balkan governments stuck to what they knew and what well-connected construction companies knew how to build, and largely subsidised hydropower. Some wind power, and in Serbia also biogas was supported, but solar power hardly at all, and as a result, solar capacity in the region is still negligible.

By the end of 2020, no fewer than 598 hydropower plants of less than 10 MW (15 MW in Albania) were online compared to 108 in 2009 - in other words, 490 new plants had been built.

Five hundred and thirty-two of the plants were part of incentives schemes. This includes some older ones which had been rehabilitated, which is why the figure is larger than the number of plants built.

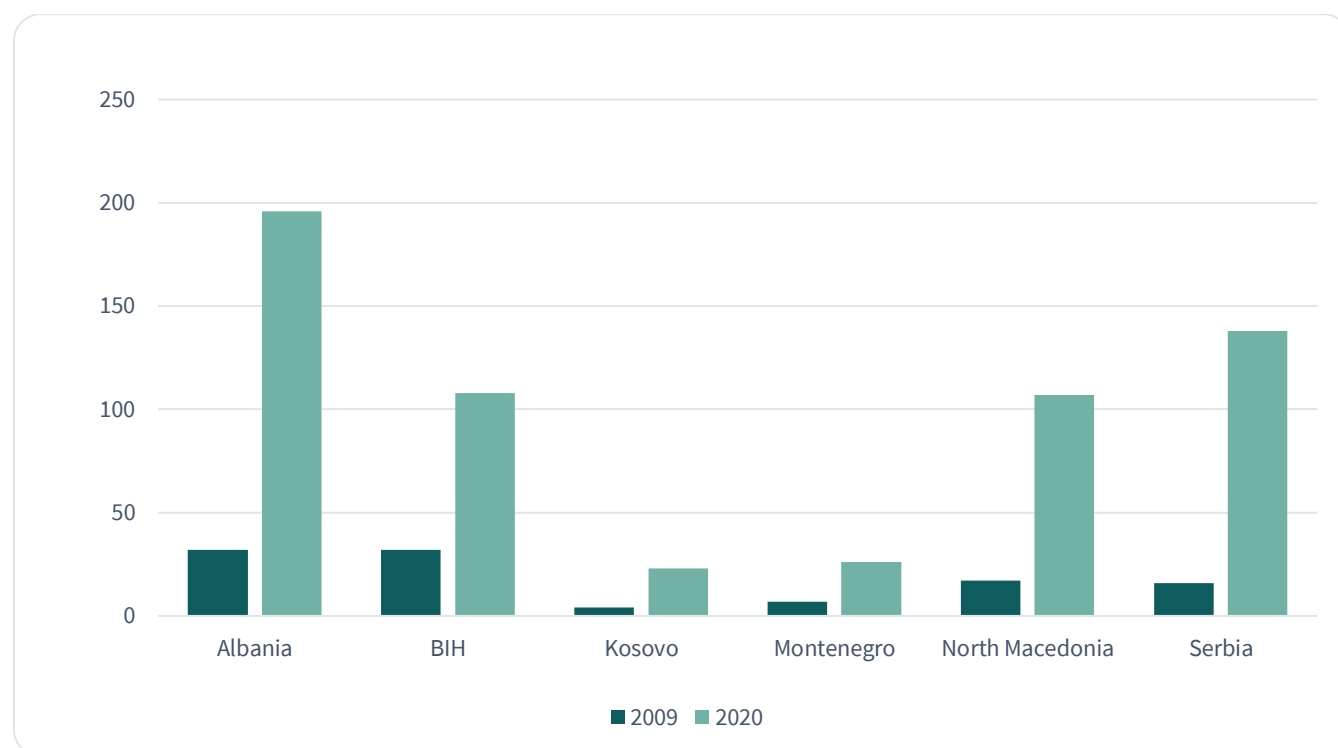


Figure 1 - Number of hydropower plants <10 MW per country (<15 MW in Albania) 2009 and 2020

## Feed-in tariffs must be phased out for all but the smallest plants

Under the Energy Community Treaty, the Western Balkan countries have to apply EU state aid rules. In 2015 the Treaty Secretariat issued policy guidelines<sup>2</sup> underlining the need to apply the Commission's 2014-2020 energy

<sup>2</sup> Energy Community Secretariat, [\*Policy Guidelines on the Applicability of the Guidelines on State Aid for Environmental Protection and Energy 2014-2020, PG 04/2015\*](#), 24 November 2015.

and environment rules,<sup>3</sup> which would include stopping new feed-in tariffs for all but the smallest plants - below 500 kW for hydropower - and introducing a system of auctions and premiums.

Renewable electricity would be sold on the market and producers who win in auctions would be able to receive a premium in case the market price was lower than the price they had pledged in the auction. This system is meant to continue to support renewables development while limiting the cost to consumers.

Countries are free to choose what type of renewables they most need to support, as long as they don't unfairly discriminate between technologies. Given the favouritism towards hydropower so far in the region, the widespread damage it has caused,<sup>4</sup> and the fact that it is a mature technology whose costs are not falling, governments should stop incentivising it.

## Mixed progress on removing hydropower support

As the countries had geared up their renewables legislation and incentives systems towards meeting their 2020 renewables targets, it made sense to have this new system in place by 2020, yet in reality none of the countries did so fully. Even those which changed their rules, like North Macedonia and Albania, left non-compliant feed-in tariffs in place for new small hydropower.

### Albania

According to the Regulator's annual report,<sup>5</sup> as of the end of 2020, Albania had 196 hydropower plants in the incentives scheme, compared to 32 existing small hydropower plants before 2009.<sup>6</sup> No fewer than 17 new plants of 15 MW or less started operating in 2020.<sup>7</sup>

Due to the high number of plants, and the fact that Albania, unlike most others in the region, supports plants up to 15 MW rather than 10, they generated a much higher percentage of domestic electricity production than elsewhere - over 21 per cent.<sup>8</sup> However, due to poor hydrology, Albania still had to import around 30 per cent of electricity in 2020.<sup>9</sup>

In the same year, the country's incentives scheme, not counting the larger Ashta plant which also has a power purchase agreement, cost almost EUR 75 million.<sup>10</sup> This was less than in 2018 and 2019 due to low rainfall in

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<sup>3</sup> European Commission, [Guidelines on State aid for environmental protection and energy 2014-2020](#), 28 June 2014.

<sup>4</sup> See for example CEE Bankwatch Network, [Public Money vs. Pristine Rivers](#), October 2021.

<sup>5</sup> Energy Regulatory Authority, [The Situation of the Power Sector and ERE Activity during 2020](#), 2021, 44.

<sup>6</sup> CEE Bankwatch Network, [Who Pays, Who Profits](#). This figure was deduced by examining Energy Regulatory Authority reports from 2009 and the previous years.

<sup>7</sup> Energy Regulatory Authority, [The Situation of the Power Sector and ERE Activity during 2020](#), 45.

<sup>8</sup> Calculated from Energy Regulatory Authority, [The Situation of the Power Sector and ERE Activity during 2020](#), 44.

<sup>9</sup> International Energy Agency statistics: [Electricity, Albania, 2020](#).

<sup>10</sup> Energy Regulatory Authority, [Gjendja e Sektorit të Energjisë dhe Veprimtaria e ERE-s gjatë Vitit 2020](#), 2021, 124.

2020. It includes solar, not only hydropower, but only 11 solar plants were operating and all were 2 MW or less, so almost all support went to hydropower.

Albania was an early mover in changing towards an auctions and premiums system. Its previous renewables incentives system did not support anything other than hydropower, and whereas the new system is more diverse, it still retains support for new hydropower up to 15 MW.

Its 2017 law on renewable energy sources allows smaller producers to receive feed-in tariffs for new plants: up to 2 MW for solar and hydropower, and up to 3 MW for wind. The solar and hydropower thresholds are higher than those in the European Commission's 2014-2020 state aid guidelines and thus non-compliant.

In August 2019, Prime Minister Edi Rama pledged<sup>11</sup> that no more plants under 2 MW would be built in Albania, recognising that they are 'useless and harmful'. However, we are not aware of any changes in the legislation that might have implemented this promise.

For larger plants, there was a phase-in period for auctions until the end of 2020. Producers with solar and wind plants above the feed-in tariff thresholds, and hydropower plants between 2 and 15 MW were able to obtain contracts for difference for premiums without an auction.

Any plants which did not do so now have to participate in auctions if they are to obtain premiums. Albania has so far completed three solar auctions, in 2018,<sup>12</sup> 2020<sup>13</sup> and 2021,<sup>14</sup> and has also announced a wind auction.<sup>15</sup>

## Bosnia and Herzegovina

By the end of 2020, 172 MW of small hydropower plants were operating across Bosnia and Herzegovina. Based on data from the state-level Regulatory Commission, they only generated 2.2 per cent of Bosnia and Herzegovina's electricity.<sup>16</sup> Two wind farms (total 86.6 MW), almost 35 MW of solar photovoltaic and 2 MW of biogas and biomass were also operating.

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<sup>11</sup> WWF Adria, '[Neither green, nor clean – Albanian prime-minister admits that small hydropower plants are “useless and harmful”](#)', 2 August 2019.

<sup>12</sup> Energy Community Secretariat, '[Albania becomes first Energy Community Contracting Party to hold renewable energy support auction](#)', 14 November 2018.

<sup>13</sup> Igor Todorović, '[Albania secures lowest solar power price in Balkans in Karavasta auction](#)', *Balkan Green Energy News*, 28 May 2020.

<sup>14</sup> Igor Todorović, '[Votolia wins auction in Albania for Spitalle solar power plant of 100 MW](#)', *Balkan Green Energy News*, 26 March 2021.

<sup>15</sup> Igor Todorović, '[Investor conference for first wind power auction in Albania](#)', *Balkan Green Energy News*, 18 November 2021.

<sup>16</sup> DERK, [Annual Report 2020](#), 2021, 2, 75.





*The Kordići small hydropower plant near Bugojno, Bosnia and Herzegovina. Photo by Robert Oroz, Eko Gotuša.*

In Republika Srpska, 42 small hydropower plants had entered the incentives scheme by the end of 2020, with another 13 having received preliminary approval.<sup>17</sup> The 42 plants received almost EUR 13.9 million in feed-in tariffs, of which more than half represented a premium compared to the reference price.<sup>18</sup> This made up almost 83 per cent of renewables incentives, with solar only receiving EUR 1.4 million and the remainder supporting biomass and biogas.<sup>19</sup> No wind plants are operating yet.

In December 2020 Republika Srpska's Renewable Energy Action Plan should have expired, in line with the fact that its renewables target had been set for 2020. However, that month an amendment to the Action Plan was adopted, extending it until the end of 2021.<sup>20</sup>

In February 2022, the Republika Srpska Assembly adopted a new Renewable Energy Law which finally brings Republika Srpska's incentives scheme into line with EU state aid rules. It limits incentives for hydropower to plants below 150 kW, and is in this respect so far the most progressive law in the region.

<sup>17</sup> Regulatorna Komisija za Energetiku Republike Srpske, [\*Regulatorni izvještaj o tržištu električne energije prirodnog gasa i nafte i derivata nafte u Republici Srpskoj za 2020. godinu\*](#), June 2021.

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> Government of Republika Srpska, [\*Odluka o usvajanju izmjena Akcionog Plana Republike Srpske za korišćenje obnovljivih izvora energije\*](#), 3 December 2020.

In the Federation of Bosnia and Herzegovina (FBiH), the situation remains chaotic. The Federal Regulator, FERK, reported that sixty-five small hydropower plants had been awarded ‘qualified producer’ status by the end of 2020,<sup>21</sup> which in practice means they receive a higher than market price for their electricity due to the way the reference price is calculated. Another seven plants owned by public utility Elektroprivreda BiH (EPBiH) do not have this status.

However, an auditor’s report shows twenty-five hydropower plants as having qualified producer status at the end of 2020, including several EPBiH plants.<sup>22</sup> It seems likely that the FERK list is not up to date as some of those producers have now been awarded the right to receive feed-in tariffs.

At the end of 2020, according to the auditor’s report, five hydropower plants had received preliminary but not full approval to receive full feed-in tariffs, while 41 had received full approval.<sup>23</sup> The Operator for renewable energy does not publish information about incentive payments made, but the audit report shows payments of at least EUR 12.7 million for qualified and privileged producers in 2020.<sup>24</sup>

Considering that Bosnia and Herzegovina’s renewables target was set for 2020, this should have been the end of the feed-in tariff scheme for new plants, but in March 2021 an attempt to extend the target, and thus the feed-in tariff scheme,<sup>25</sup> was prevented by parliamentarians and civil society.

Confusingly, however, two decisions were taken in February<sup>26</sup> and May 2021<sup>27</sup> which attempted to extend the scheme, without changing the law. It is unclear whether these decisions were legal. Due to the Operator’s lack of transparency, it is also unclear whether new feed-in tariffs are still being approved.

In late September, the Office for Auditing Institutions in FBiH published an audit report<sup>28</sup> which confirmed much of what was already clear about the Operator for renewable energy failing to publish updated information on which producers had obtained the right to feed-in tariffs and how much of the available quota remained for each technology. It also uncovered new information, such as the fact that, by the end of 2020, more solar

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<sup>21</sup> Regulatorna komisija za energiju u Federaciji Bosne i Hercegovine, [\*Izveštaj o radu FERK-a za 2020. godinu\*](#), September 2021.

<sup>22</sup> Ured za reviziju institucija u Federaciji Bosne i Hercegovine, [\*Izveštaj o finansijskoj reviziji Operatora za obnovljive izvore energije i efikasnu kogeneraciju za 2020. i 2019. godinu\*](#), September 2021.

<sup>23</sup> Ibid.

<sup>24</sup> Ibid.

<sup>25</sup> Pippa Gallop, [\*‘Bosnia and Herzegovina: Who gains from extending the FBiH renewables support scheme?’\*](#), CEE Bankwatch Network, 29 March 2021.

<sup>26</sup> Government of the Federation of Bosnia and Herzegovina, [\*Odluka o utvrđivanju obavezujućih ciljeva za korištenje obnovljivih izvora energije u Federaciji Bosne i Hercegovine\*](#), 25 February 2021.

<sup>27</sup> Government of the Federation of Bosnia and Herzegovina, [\*Odluka o izmjeni odluku o utvrđivanju obavezujućih ciljeva za korištenje obnovljivih izvora energije u Federaciji Bosne i Hercegovine\*](#), 6 May 2021.

<sup>28</sup> Ured za reviziju institucija u Federaciji Bosne i Hercegovine, [\*Izveštaj o finansijskoj reviziji Operatora za obnovljive izvore energije i efikasnu kogeneraciju za 2020. i 2019. godinu\*](#), September 2021.

capacity had been awarded the right to feed-in tariffs than was allowed by the Renewable Energy Action Plan of FBIH.

Despite FBIH having had a draft of a new Law on Renewable Energy since at least 2019, it has not yet been subject to public consultation or submitted for adoption.

## Kosovo

Three new small hydropower plants went online during 2020 (2021 data not yet available), bringing the total to 18 in the incentives scheme and five small plants not included in the scheme.<sup>29</sup> Incentives cost EUR 18.6 million - up three million compared to 2019.<sup>30</sup> No breakdown by source is available, but as no new wind capacity or incentivised solar capacity came online in 2020, presumably this increase was mostly due to the new hydropower plants.

At the end of 2020, Kosovo's Regulatory Office terminated the support scheme for new plants based on feed-in tariffs.<sup>31</sup> A new law on renewable energy is under preparation but has not yet been subject to public consultation.

During 2021 evidence on the damage caused by small hydropower continued to mount up as both the Environment ministry<sup>32</sup> and the Kosovo Ombudsperson<sup>33</sup> published reports on the legal breaches and damage caused by small hydropower plants.

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<sup>29</sup> Energy Regulatory Office of Kosovo, [Annual Report 2020](#), March 2021.

<sup>30</sup> Transmission, System and Market Operator - KOSTT, [Financial Statement and Auditor's Report](#), 31 December 2020, 31.

<sup>31</sup> Energy Regulatory Office, [Decision ERO Code: V 1321 2020](#), 10 December 2020.

<sup>32</sup> Ministry for Environment, Spatial Planning and Infrastructure, [Raport i grupit punues për shqyrtimin e procedurave administrative të zbatuara për hidrocentrale dhe ndikimin e tyre në ujëra dhe mjedis](#), June 2021.

<sup>33</sup> Ombudsperson, [Raport Me Rekomandime 365/2018](#), February 2021.



## Montenegro



*Dry riverbed below the Mojanska 1 intake, Montenegro. Photo by Dobrica Mitrović*

In 2009, Montenegro had seven hydropower plants under 10 MW and by the end of 2020 this reached 26.<sup>34</sup> In 2021 this number grew further to 37, with a total capacity of 55 MW. Small hydropower plants generated around 3 per cent of domestic electricity in 2020.<sup>35</sup>

Feed-in tariffs for renewables as a whole cost EUR 38.3 million in 2020, of which EUR 19.4 million was the incentive itself and the remainder the reference price of electricity.<sup>36</sup> However, no breakdown was given on how much was received by each company or energy source.

After widespread public outcry about the damage caused by small hydropower plants and the fact that many of those benefiting were known to be close to the regime, Montenegro was the first country in the region to

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<sup>34</sup> Government of Montenegro, [Energy Balance of Montenegro 2021](#), December 2020.

<sup>35</sup> Government of Montenegro, [Energy Balance of Montenegro 2022](#), December 2021.

<sup>36</sup> COTEE, [Izveštaj o poslovanju DOO „Crnogorski operator tržišta električne energije“- Podgorica, za period 01.01.2020 - 31.12.2020. godine sa finansijskim iskazima i Izveštajem nezavisnog revizora](#), 20 May 2021, 21.



include a legal provision that it would stop awarding feed-in tariffs after meeting its 2020 renewable energy target.

In fact, mainly due to the revision of biomass data, Montenegro had already met its target several years before 2020, but feed-in tariffs continued to be awarded right up until 2020 and 2021.<sup>37</sup> It seems unlikely that all of the producers had already submitted their applications before the law changed. It was only after the change of government in late 2020 that reports were finally adopted on the targets having been met, and the Decree which enabled feed-in tariffs to be approved was annulled on 26 July 2021.<sup>38</sup>

The Law on Energy was amended in 2020 to allow support for renewables via auctions and premiums, but details of how auctions that are not location-specific will work in practice still need to be worked out.

In addition, at the end of 2021 only 2.57 MW of solar photovoltaics were installed in Montenegro. Although power utility EPCG has launched initiatives to increase the use of solar by households, the utility-scale Briska Gora solar project is delayed - a heavy blow for a country that urgently needs to close its only coal plant.

## North Macedonia

By the end of 2020, North Macedonia had 107 small hydropower plants, producing 5.5 per cent of electricity.<sup>39</sup> Ninety-six of these are newer ones which receive feed-in tariffs. The incentives scheme cost around EUR 41 million in 2020, of which around EUR 15.8 million went towards small hydropower.<sup>40</sup>

In 2018, the government adopted a new Law on Energy, opening the way for the introduction of renewable energy auctions, but the subsequent implementing legislation left feed-in tariffs for small hydropower intact. The Decree on support measures<sup>41</sup> still allowed first-come, first-serve feed-in tariffs for hydropower, biogas and biomass, but only feed-in premiums for wind and solar.

After unsuccessful attempts to resolve the issue at the national level, Bankwatch and its member group Eko-Svest filed a complaint to the Energy Community Secretariat on 1 July 2019. The case is still being processed.

Although North Macedonia is considered an energy transition leader in the region, and was the first Western Balkan country to set a coal phase-out date, it is still reluctant to let go of its hydropower ambitions, despite the increasing variability of its rainfall.

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<sup>37</sup> See the register of privileged producers [here](#).

<sup>38</sup> Government of Montenegro, [Uredba o prestanku važenja Uredbe o načinu ostvarivanja i visini podsticajnih cijena za električnu energiju proizvedenu iz obnovljivih izvora i visokoefikasne kogeneracije](#), 26 July 2021.

<sup>39</sup> Energy and Water Services Regulatory Commission of the Republic of North Macedonia (ERC), [2020 Annual Report](#), April 2021, 33.

<sup>40</sup> Energy and Water Services Regulatory Commission of the Republic of North Macedonia (ERC), [2020 Annual Report](#), 39-40.

<sup>41</sup> Government of North Macedonia, [УРЕДБА ЗА МЕРКИТЕ ЗА ПОДДРШКА НА ПРОИЗВОДСТВОТО НА ЕЛЕКТРИЧНА ЕНЕРГИЈА ОД ОБНОВЛИВИ ИЗВОРИ НА ЕНЕРГИЈА](#), 5 February 2019.



*The Tearce 97 intake blocks the Bistrica river (North Macedonia) even when the plant is not producing electricity.  
Photo by CEE Bankwatch Network*

## Serbia

Around two-thirds of Serbia's energy is generated by coal and most of the remainder by hydropower plants. By the end of 2020, according to Regulatory Authority data, 138 small hydropower plants were online, of which 18 were older ones owned by Serbia's state-owned utility Elektroprivreda Srbije (EPS), and 120 were newer ones owned by other producers.<sup>42</sup> However, EPS' list of privileged producers contains 125 small hydropower plants not owned by EPS.<sup>43</sup>

Based on the Regulatory Authority's annual report, these incentivised plants still produced only 0.62 per cent of Serbia's electricity production, even less than in previous years due to low rainfall.<sup>44</sup>

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<sup>42</sup> Energy Agency of the Republic of Serbia, [2020 Energy Agency Annual Report](#), May 2021, 15-16.

<sup>43</sup> Elektroprivreda Srbije, [Списак закључених уговора са повлашћеним произвођачима](#), updated 7 December 2021.

<sup>44</sup> Energy Agency of the Republic of Serbia, [2020 Energy Agency Annual Report](#), May 2021, 44.

Solar and wind have been slow to get off the ground, although wind capacity greatly increased in 2018 and 2019. By 2020 there was 398 MW of wind power installed, while solar languished at around 12 MW.<sup>45</sup>

Due to the amount of wind power that came online in 2018 and 2019, small hydropower no longer takes up a dominant share of incentives. In 2020 feed-in tariffs for hydropower amounted to nearly EUR 21.5 million, or 16.2 per cent of renewables incentives.<sup>46</sup> Wind took the largest share at EUR 78.7 million.<sup>47</sup>

In 2021, after years of inactivity in planning Serbia's post-2020 renewables development, a whirlwind of activity resulted in several new laws being adopted, including one on renewable energy.<sup>48</sup> The law brings Serbia's incentives system into line with the EU's 2014-2020 state aid guidelines, although it also contains some potentially problematic provisions on 'strategic projects' that appear designed to bypass normal public procurement procedures.

In recent weeks Serbia has been facing a political backlash against its new renewables legislation,<sup>49</sup> despite the fact that its coal sector has proven unreliable,<sup>50</sup> leading to high electricity imports. It remains to be seen whether the progress made on renewables in the last year will be consolidated or rolled back.

## What now for the Western Balkans' renewables incentives schemes?

Progress in the last year towards more efficient and environmentally acceptable renewable energy policies in the region has been mixed.

Republika Srpska, after long delays, has taken a very positive step forward with its new law on renewable energy. It now needs to ensure prompt implementation. At the same time it needs to avoid hidden subsidies for hydropower via state guarantees for loans for larger plants such as Dabar and Buk Bijela.

Serbia has also taken important steps forward, but it remains to be seen whether this will continue, given the recent political pressure against the energy transition. It is particularly crucial to make progress on encouraging prosumers and on launching solar auctions.

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<sup>45</sup> Energy Agency of the Republic of Serbia, [2020 Energy Agency Annual Report](#), 14-15.

<sup>46</sup> The total given by AERS also includes incentives for fossil fuelled cogeneration plants, but we calculate only incentives for renewables. Energy Agency of the Republic of Serbia, [2020 Energy Agency Annual Report](#), May 2021, 65.

<sup>47</sup> Energy Agency of the Republic of Serbia, [2020 Energy Agency Annual Report](#), 65.

<sup>48</sup> Igor Đorđević, Teodora Vujošević and Ivan Gazdić, '[High interest in renewables in Serbia – new regulation in a nutshell](#)', *Balkan Green Energy News*, 30 June 2021.

<sup>49</sup> Vladimir Spasić, '[State-owned power utilities EPS, EMS ask for modification of law on renewables](#)', *Balkan Green Energy News*, 11 January 2022.

<sup>50</sup> Igor Todorović, '[Acting CEO of Serbia's power utility EPS quits after several major outages](#)', *Balkan Green Energy News*, 12 January 2022.



Montenegro has finally taken decisive action to stop awarding feed-in tariffs, cancelled several small hydropower concessions, and started to encourage household solar, but urgently needs to progress with larger wind and solar projects which are sorely needed to replace the Pljevlja coal plant. It needs to avoid getting distracted by the Komarnica large hydropower plant and ideas about gas plants, which would cause a new fossil fuel lock-in.

Kosovo, too, has made the first step by halting the feed-in tariff scheme for new plants. It is also doing better than others in the region with regard to connecting prosumers.<sup>51</sup> It now needs to move forward with new renewables legislation to set a predictable incentives framework until 2030 as well as making sure that planned solar and wind projects move forward.

North Macedonia, declaratively a frontrunner in sustainable energy, seems to have stalled in the last year and urgently needs to finally stop awarding new feed-in tariffs for small hydropower.

Albania's solar and wind auctions need to start showing on-the-ground results, and the country must stop offering incentives for hydropower, particularly feed-in tariffs for plants under 2 MW.

The FBIFH incentives system has to be completely overhauled, starting by cancelling the two decisions made in 2021 to extend the 2020 feed-in tariff quotas. The draft law on renewable energy must be publicly consulted as soon as possible, and adopted. But in parallel, stronger action needs to be taken regarding the conduct of the Operator for renewable energy, as the new Director is failing to increase its transparency, and public trust can hardly be restored by the timid corrective measures from the audit report mentioned above.

Across the region, great progress is being made in stopping small hydropower plants from infesting pristine rivers and streams, but faster action has to be taken to stop using public money to support them. Appropriately sited solar and wind investments urgently need support, as do investments to tackle energy losses in households and distribution networks. We can no longer afford to waste public funds on damaging and climate-vulnerable energy sources like hydropower.



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<sup>51</sup> Energy Community Secretariat, [Transition Tracker, Third Edition](#), June 2021.