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## Scientific Position Paper

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### THE CASE OF THE UPPER DRINA

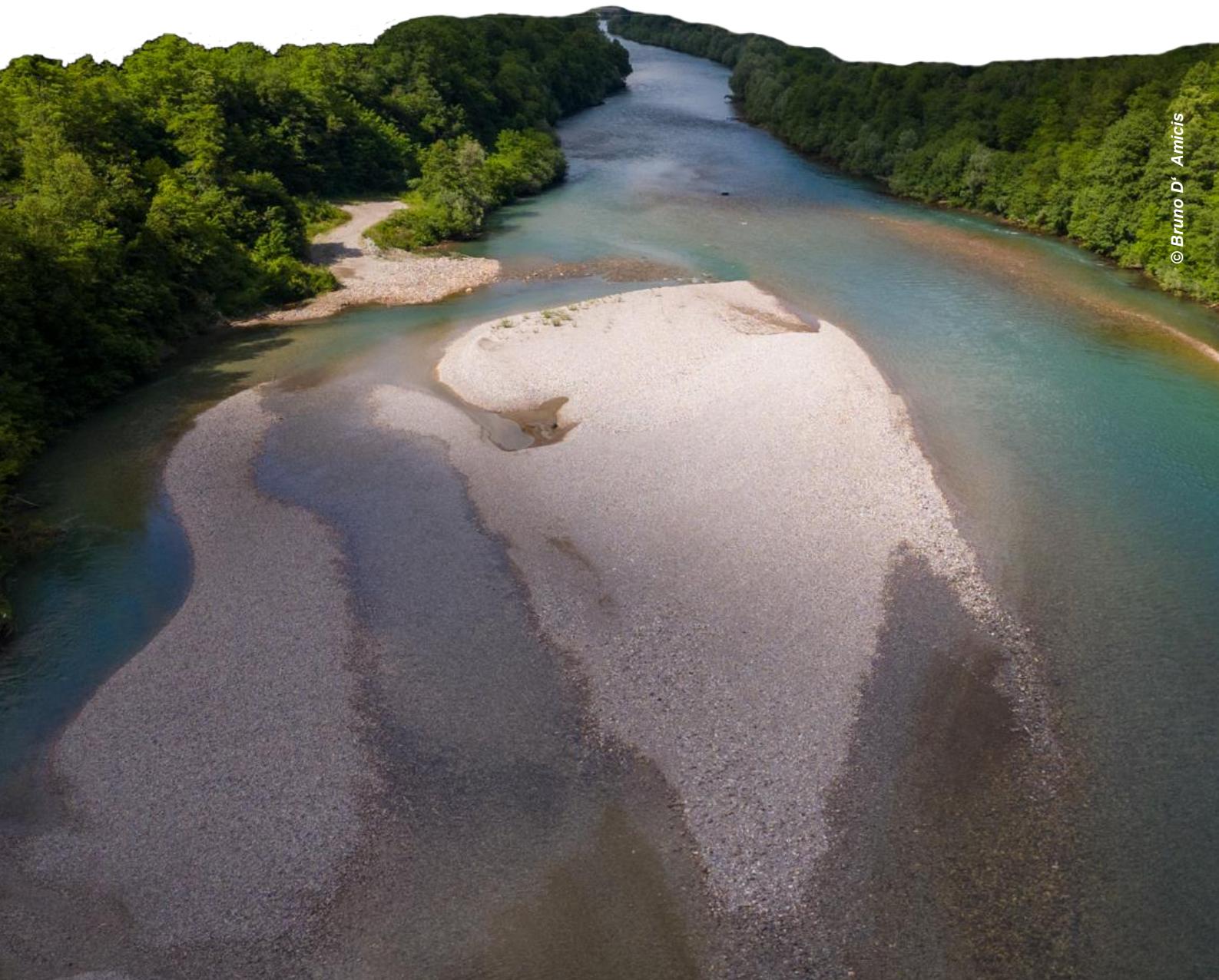
#### Ecological integrity as a prerequisite for preserving a unique aquatic core habitat of global significance

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2025



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# THE UPPER DRINA

## Ecological integrity as a prerequisite for preserving a unique aquatic core habitat

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### Background | Criticism | Recommendations

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#### Key messages

I

The Drina catchment upstream of the Lim River confluence – including its still near-natural tributaries Tara, Sutjeska, and Čehotina – represents a unique aquatic core habitat within the Danube basin. Preserving the ecological integrity of this unique freshwater system is of utmost importance.

II

The Upper Drina Basin forms an ecologically functional and interconnected river network. The hydrological and biological connectivity of this system is crucial for maintaining aquatic biodiversity and ensuring the long-term viability of sensitive and endangered fish populations, most notably the Danube salmon (*Hucho hucho*).

III

Due to its pristine hydro-morphology and largely undisturbed connectivity, we consider the Upper Drina Basin not only a regional conservation priority, but a centerpiece in promoting the global survival of the Danube salmon.

IV

Any political or financial support for further hydropower development in the Upper Drina River system contradicts the principles of sustainable water management. Such projects cause severe environmental impacts and are likely to have accumulating, long-term negative effects on riverine ecosystems.

V

We, the undersigned members of the scientific community, therefore, call for an immediate halt to all hydropower expansion in the Upper Drina and its tributaries. The construction of additional hydropower plants would cause irreversible damage to the native fish fauna and would likely drive the last wild populations of Danube salmon to extinction.

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#### Background and Motivation

The Upper Drina Basin (hereafter UDB), located in the border region between Bosnia and Herzegovina and Montenegro, encompasses a remarkably complex mosaic of ecosystems, many of which remain in a near-natural state. These relatively undisturbed river stretches represent a unique ecological heritage that warrants strict protection. The basin continues to support numerous species and habitats of exceptional conservation value, recognized at national, regional, and European levels for their contribution to biodiversity (World Bank Group WBIF, 2017).

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## THE UPPER DRINA

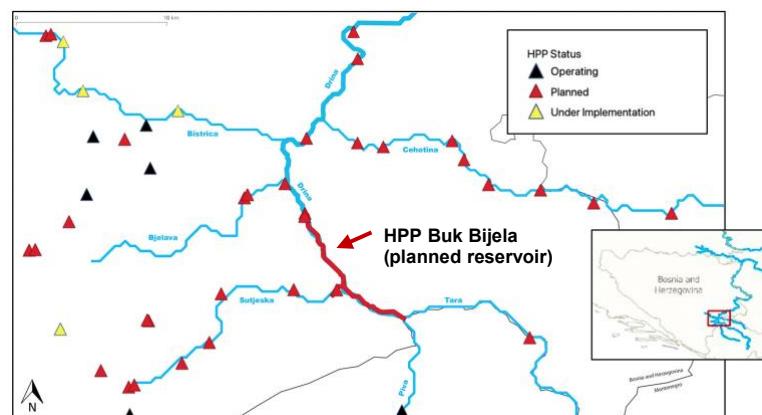
### Ecological integrity as a prerequisite for preserving a unique aquatic core habitat

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#### Background | Criticism | Recommendations

Current hydropower development requires urgent attention because the ecological significance of the Upper Drina region – both within the UDB and the broader Danube catchment – is being critically underestimated and insufficiently acknowledged. Alone on the UDBs first 50 km, including the tributaries Tara, Sutjeska, and Čehotina, over 25 new hydropower plants (HPPs) are planned, with three already under construction on the Bistrica River and one long operating on the Piva River. Considering that the first 50 km of the Drina River together with the Tara River (which flows through the UNESCO World Heritage Site of Durmitor National Park) and its headwater tributaries form a 200 km-long, and in many regards pristine river system, which is possibly the least polluted and most intact river system in the entire Danube basin (Weiss et al., 2018), any deterioration must be seen as an enormous and unacceptable threat to Europe's river landscape.

**Fig.1.** The Upper Drina Basin is under acute threat from extensive hydropower development, with numerous new plants planned or under construction across its mainstem and tributaries (HPP data from Schwarz, 2024).



The proposed development of hydropower in the UDB stands in stark contrast to the knowledge that such interventions would profoundly disrupt the entire riverine ecosystem, including its complex abiotic–biotic interactions and diverse aquatic and semi-aquatic fauna (Freyhof 2015; Weiss et al. 2018; Obradović & Vulević 2023; Pinter & Gruber 2024; He et al. 2024). The construction of dams and the loss of free-flowing rivers are among the primary drivers of population decline in migratory freshwater fish. According to Deinet et al. (2024), more than 40% of European freshwater fish species are threatened. The Living Planet Index further reports that European migratory freshwater fish populations have declined by an average of 75% between 1970 and 2020. These figures represent some of the highest threat levels recorded for any major vertebrate group in Europe (Freyhof & Brooks, 2011). In the light of such devastating developments, the UDB as an exceptional biodiversity hotspot on a continental level should be in the spotlight as one of the last strongholds for riverine ecosystems holding highly threatened species.

Given that a central HPP project in the region — the “Buk Bijela” project with a dam height of 55 m and a reservoir length of more than 11 km — was already flagged for further analyses within the Drina River Basin - Roof Top report (World Bank Group WBIF, 2017), and considering that its last environmental impact assessment in 2012 was rejected (Riverwatch, 2019), it remains highly questionable whether the current evaluation methods adequately reflect the relevant evaluation criteria. Foreseeable irreversible alterations to the riverine regime of the UDB, especially those associated with hydropower development and its well-documented ecological impacts (He et al. 2024), require rigorous scrutiny under the precautionary principle.

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## THE UPPER DRINA

### Ecological intactness as a prerequisite for preserving a unique aquatic core habitat

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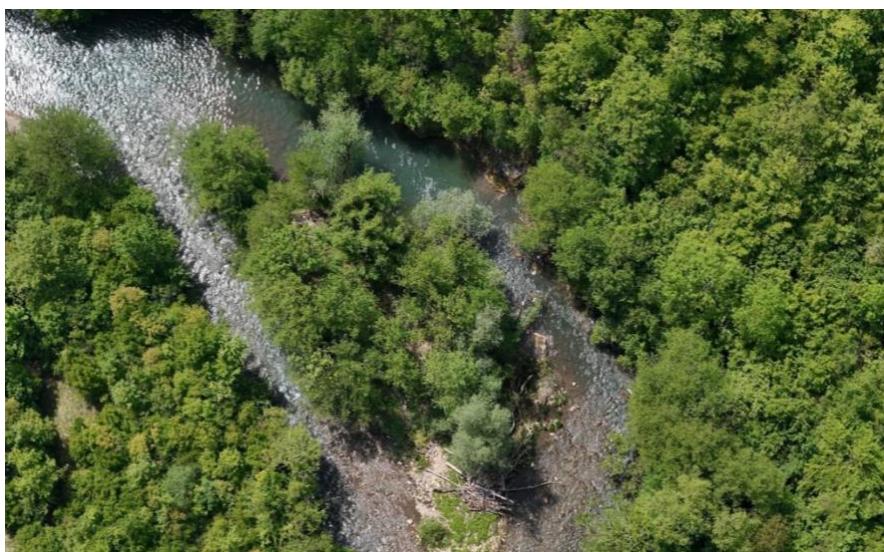
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#### The Upper Drina as a recognized Balkan Biodiversity Hotspot

Despite its outstanding ecological value, only about 5% of the Drina River Basin is currently under protection - well below European averages - underscoring the urgent need to preserve remaining intact habitats, including designated Natura 2000 areas (World Bank Group WBIF, 2017). Aquatic biodiversity, in particular, receives limited attention in current protection strategies. It is therefore necessary to emphasize that of the 22 fish species listed for the Upper Drina Basin (Weiss et al. 2018), many are subject to strict conservation requirements: 13 species — including the pigo (*Rutilus pigus*), souffia (*Telestes souffia*), and grayling (*Thymallus thymallus*) — are protected under the Bern Convention and/or the EU Habitats Directive. In addition to the Danube salmon, the pigo and the ecologically important species nase (*Chondrostoma nasus*) are classified as endangered or near threatened by the IUCN. Thus, future management must prioritize the conservation of remaining ecologically intact river sections, including existing and potential Natura 2000 sites (World Bank Group WBIF, 2017; Obradović & Vulević, 2023).

**Fig.2.** Structural diversity and natural dynamics, as seen here on the Čehotina River, form the basis for the rich aquatic life of the Upper Drina Basin, including over 20 fish species. The planned construction of 9 hydropower plants would destroy this habitat and eliminate the huchen's core range of at least 25 km.

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#### The Ecological Integrity of the Upper Drina River System

While the Upper Drina has experienced some downstream hydrological modification due to hydropoeaking from a large dam on the lower Piva River, most of its channel and habitat structure – especially in its tributaries – remains remarkably intact (Pinter & Gruber, 2024). This integrity underpins a diverse mosaic of habitat types – spawning grounds, refuge areas, and juvenile development zones – that are essential for the survival of the occurring fish fauna. However, these habitat features are highly vulnerable to alteration through hydropower development (He et al., 2024). Their ecological function depends not only on their presence but on sustained connectivity across both space and time. It is this connectivity – linking habitats longitudinally, laterally, and across seasonal cycles – that enables the full expression of life-history strategies within the aquatic community. Disruption of these linkages through river fragmentation, altered flow- and sediment regimes, as well as the habitat loss due to the construction of reservoirs would fundamentally compromise these processes, destroying the ecological integrity of the entire aquatic assemblage.

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#### The Upper Drina River Basin: A Critical Stronghold for the Danube Salmon

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A total of 769 km of Danube salmon habitat are found in the Drina basin alone – amounting to 42% of all remaining Balkan habitat for this species and nearly one-third of the species' global distribution (Freyhof et al., 2015). This is not merely a river segment of importance – it is a cornerstone of the species' survival. The proposed Buk Bijela dam and reservoir, along with planned hydropower plants in the surrounding tributaries, would fragment the core of this ecological cornerstone and erase habitat that is demonstrably still functional. For species such as the Danube salmon, longitudinal connectivity — both upstream and downstream — between the Drina and its tributaries is essential for accessing critical spawning, feeding, and refuge habitats. Conservation action must therefore prioritize maintaining the ecological functionality of existing systems rather than relying on post-impact restoration.

**Fig.3.** The UDB is one of the Danube salmon's last strongholds, holding nearly one-third of its global habitat. Planned dams like Buk Bijela threaten to fragment this vital ecosystem and disrupt key migration routes.

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#### Connectivity: A Functional Imperative for the Danube Salmon & its accompanying species

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The Danube salmon, along with the broader fish community of the region, relies on a network of interconnected river habitats that remain accessible both spatially and seasonally throughout the year. In the UDB, spawning migrations into tributaries such as the Čehotina, Sutjeska and Bistrica rivers were documented during field surveys in 2024, supported by direct observations, redd counts, and local knowledge from fisheries authorities (Pinter & Gruber, 2024). These movements are timed to specific thermal and hydrological cues, underscoring the sensitivity of the Danube salmon to flow regulation. Temperature and flow interruptions caused by hydropeaking operations – already observed due to the Piva Dam – can directly affect spawning activity, egg and juvenile fish survival. Recent findings from Danube tributaries clearly illustrate that fragmentation leads to missing age classes and low juvenile recruitment despite the presence of adult fish (Pinter et al. 2024). This suggests that ecological connectivity as well as intact hydrological and sediment dynamics - not just habitat availability - are essential for a functionally reproducing population. For the organisms of the Drina River, especially migratory fish species such as the Danube salmon, free upstream and downstream migration as well as lateral connectivity (accessibility of tributaries) is essential, as they depend on intact migratory corridors between spawning, feeding, and overwintering habitats.

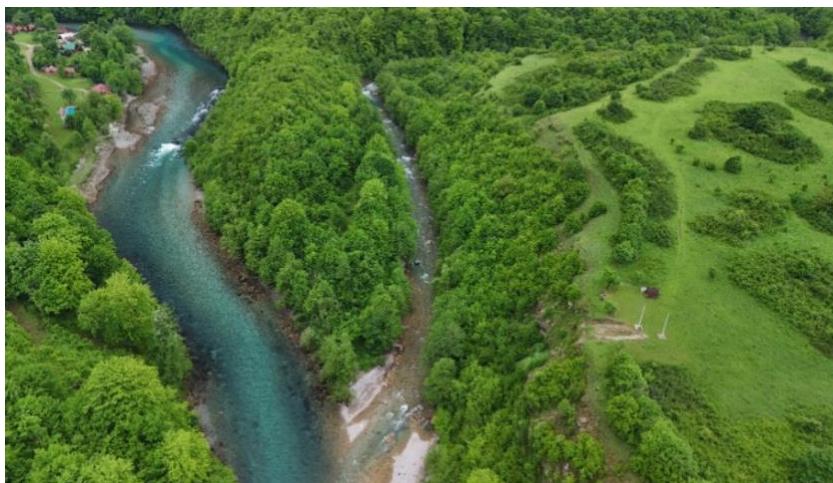
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**Fig. 4.** Free-flowing corridors like the confluence of the Sutjeska and Drina rivers are vital for native fish to complete their life cycle. This site will be submerged by the planned Buk Bijela reservoir.

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**Fig.5.** Construction site Bistrica B2-a during the spawning period of Danube salmon in Spring 2023.

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**Fig. 6.** Heavy input of fine sediment into the Bistrica River during the spring spawning season of the Danube salmon – caused by hydropower construction – disrupts successful reproduction of the resident fish community.

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#### **Stocking as a Limited Tool: The Inadequacy of Hatcheries for Danube Salmon Conservation**

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The idea that artificial propagation and stocking can compensate for the decline of the Danube salmon population lacks scientific support and overlooks key ecological risks. Numerous studies have demonstrated that hatchery fish exhibit reduced survival, impaired fitness, and diminished reproductive success in the wild (e.g. Araki & Schmid, 2010; Christie, et al. 2012, Christie et al., 2014; McMillan et al., 2023). Moreover, stocked individuals often originate from genetically divergent lineages, resulting in genetic homogenization, outbreeding depression, and erosion of locally adapted traits (Einium & Fleming, 2001; Naish et al., 2007). In contrast, the Danube salmon's population in the Upper Drina continues to reproduce naturally in the wild. Introducing hatchery fish into this system would risk disrupting existing genetic structure and ecological dynamics and is not supported by conservation science as an effective or appropriate measure. We assert that stocking is not an alternative to habitat protection. Stocking must not be used as a mitigation tool to justify habitat destruction. In the case of the Upper Drina, any such proposal must be categorically rejected.

#### **Cumulative impacts of HPP development on the Upper Drina must be assessed based on actual available data and with regard to transnational effects**

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As stated in Obradovic & Vulevic (2023) management decisions should be grounded in the frame of a Joint Water Management Project of the Drina River Basin. While the Republic of Serbia, Bosnia and Herzegovina (the Republic of Srpska and Federation BiH), and Montenegro have recently started bilateral cooperation, all three countries are signatories to the most important multilateral agreements of water resources management, namely the Water Convention on the Protection and Use of Transboundary Watercourses and International Lakes (Helsinki, 1992), the Danube River Protection Convention (Sofia, 1994), the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991), the Aarhus Convention (1998), as well as the agreement on the Sava River basin (2002). The extent of the planned Buk Bijela reservoir up to the Montenegrin border, renders transboundary environmental impacts unavoidable, underscoring the need for coordinated international management. The same refers to the planned expansion of hydropower development on the Ćehotina River in Montenegro, which is also relevant for Bosnia and Herzegovina.

#### **Environmental Assessments must be based on recognized state-of-art Scientific Standards**

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Given the ecological sensitivity of the UDB and the conservation status of the Danube salmon, any infrastructure proposal must meet the highest scientific and legal standards for environmental assessment. To comply with international standards and the precautionary principle, assessments must be based on best-available science. Anything less renders approval processes invalid and in conflict with international conservation obligations, listed in the preceding paragraph.

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#### RECOMMENDATIONS FROM THE SCIENTIFIC COMMUNITY

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Further expansion of hydropower in the region is incompatible with the conservation needs of this ecologically valuable river system. The scientific community clearly advises against any further development, and at the very least, any proposed projects must undergo comprehensive Environmental Impact Assessments (EIAs). Baseline data for the Environmental Impact Assessment must be complemented through wide-ranging studies to fill up data gaps and strengthen base assumptions on species occurrence and distribution.

We argue that the following are non-negotiable prerequisites for any Environmental Impact Assessment (EIA) concerning this exceptional fish stronghold:

- 1. Full seasonal surveys of fish fauna, including all life stages of Danube salmon and other endangered fish species.**
- 2. High-resolution mapping of spawning and nursery habitats using drone, eDNA, and telemetry techniques.**
- 3. Full seasonal surveys of fish fauna, including all life stages of *Hucho hucho*.**
- 4. Quantitative modelling of hydrological, sedimentological, and thermal alterations that may be caused by the proposed reservoirs and hydropower operations.**
- 5. Cumulative impact analysis, addressing system-wide effects of multiple existing or planned hydropower plants.**
- 6. Explicit consideration of genetic population structure, connectivity, and the evolutionary significance of local adaptations of Danube salmon.**
- 7. Potential impacts on the population of Danube salmon and other Habitat Directive species living in the adjacent UNESCO site and National Parks, Sutjeska in BiH and Durmitor in Montenegro.**
- 8. Assessment of downstream and transboundary effects.**

A protection and management strategy for the Danube salmon and the aquatic habitats must be developed with the aim of sustainable and socio-economically valuable use of the landscape and its resources.

Efforts should be undertaken to remediate the current hydro- and thermal peaking load generated by the operating HPP on the Piva River, as it puts additional pressures on the fish species in the Upper Drina River.

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