



Prof. Dr. Fritz Schiemer,
University of Vienna, Center of Ecology
Althanstr. 14, 1090 Vienna, AUSTRIA
friedrich.schiemer@univie.ac.at

His Excellency Edi Rama
Prime Minister of the Republic of Albania
Bulevardi "Dëshmorët e Kombit" Nr.7
1000 Tirana
ALBANIA

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The Vjosa River – Poçëm hydropower project: “Profundal Environmental Impact Assessment Report” prepared by GR Albania consulting

Dear Prime Minister Edi Rama,

Our analysis of the recently presented “Profundal Environmental Impact Assessment Report” (EIA) on the Vjosa– Poçëm hydropower project has shown that **this EIA is far from complying with minimum standards** according to Albanian law no. 10440 "On Environmental Impact Assessment" dated 07.07.2011 as well as to EU legislation.

Our analysis found the following shortcomings of the Poçëm EIA report:

- No efforts were made to create a solid **database** on environmental and ecological conditions at the planned damming site as well as in the whole river system, which will be affected in multiple ways by dam construction. In particular, the document lacks a detailed pre-impact assessment on the hydrological, morphological and morphodynamic situation, as well as on the local flora and fauna, ecological processes and services.
- We were surprised to discover that the presented EIA has been produced (**plagiarized**) to a significant proportion (60%) by copy and paste of largely irrelevant material from other texts.
- The collated material does by no means allow a **professional examination of effects and risks**, especially during the operation phase of such a dam. Hence, the report **fails to meet the basic standards required for an EIA**, as e.g. documented in the *“Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programs on the environment”*
- Not only the immediate effects of such a dam, but also the **long-term negative environmental consequences** on hydrology, water quality, dwindling of groundwater resources in alluvial floodplains, and loss of biodiversity have not been seriously addressed.
- The chapter on **biological impacts** consists of only 10 text lines which do not even mention the dam’s impacts on biota during the operation phase. Any science-based prediction in regards to the effects on the Vjosa’s fauna and flora is missing.
- The usual phases of **project screening and scoping** (see e.g. *Guidance on EIA -Scoping*) are not documented. It thus seems that no attempt has been made to check alternative low-impact concepts of energy generation.

In **summary**, the presented document severely fails to meet Albanian juridical requirements which are increasingly based on technical EU standards, EU directives (e.g. EIA Directive, European Water Framework Directive, Natura 2000 Directives, EU Flood Risk Directive) or recent juridical decisions by the European Court of Justice (2015) on the protection from deterioration of rivers in the EU.

The **Memorandum** "*Research Requirements for a sustainable development in the Vjosa corridor*" (Sept. 2016), signed by 228 international experts, has highlighted the unique value of the river system due to its still intact river continuity. For this reason, the memorandum requested a min. 3-year moratorium on dam construction works in order to allow for an interdisciplinary pre-impact assessment program carried out by hydrologists, geomorphologists, ecologists and socio-economists.

Our analysis of the Poçem EIA stands in stark contrast with the summarizing statements of the EIA "*The positive and negative impacts of the proposed project are identified and calculated*" and "*The whole project is in full compliance with the best international standards, and this increases the safety work level during the operation process reasonable scale as possible*"

These conclusions of the Poçem EIA are completely unsubstantiated as are not based on any reliable data. Regrettably, the presented EIA does not meet any professional standards, and in its present form it represents rather a caricature of an EIA than a serious basis for decision.

Respectfully,



emer. o. Prof. Fritz Schiemer
University of Vienna

In cooperation with

PD Dr. Martin Pusch, *Leibniz-Institute of Freshwater Ecology and Inland Fisheries, Berlin, Germany*

Prof. Wolfram Graf, *University of Natural Resources and Life Sciences, Vienna, Austria*

Dr. Robert Konecny, *Environment Agency Austria*