

WWF POSITION PAPER

ON CONSTRUCTION OF THE UPPER DNIESTER

CASCADE OF HYDROPOWER POWER PLANTS

Construction of the Upper Dniester cascade of hydropower power plants (HPPs), hereinafter referred to as the Project, is foreseen in the Program of hydropower development for the period until 2026, which was approved by Decree of the Cabinet of Ministers of Ukraine No. 552p, as of July 13, 2016 (hereinafter referred to as the Program 2026).

The Project envisages building a cascade of six runof-the-river/diversion type HPPs with total capacity of 390 MW (the Program).

- Run-of-the-river HPP is where the water head is created by the dam
- diversion HPP is where the water is delivered from the river course by pipe, channel, or duct

WWF believes that the Project will have a significant negative impact on the environment and create social tensions in the region.

The Project will have a detrimental effect on aquatic ecosystems and ecoservices; areas where there are settlements, archeological and architectural sites can be flooded; the dams will close the door to development of the popular type of water tourism today: the Dniester rafting.

The Ministry of Environment and Natural Resources of Ukraine (The Ministry of Environment) also disagrees with the Project (Letter No. 5/1-8/6360-16 as of 06.07.2016). According to the Ministry of Environment, the Project may have a significant impact on the natural complexes of "Dniester Canyon" National Nature Park, "Khotynsky" National Nature Park, Galician National Nature Park, and a number of other nature reserve sites of other categories.

In addition, the Project is planned to be implemented in those parts of the Dniester river, which are still unregulated. Every year, the number of natural unregulated rivers is decreasing in Ukraine, so they should be protected from destruction and development as much as possible.

Free-flowing rivers are the freshwater equivalent of wilderness areas. The natural flow variations of these rivers shape and form diverse riverine habitats, within and next to the river. In many places, connected, free-flowing rivers are crucial for carrying sediment downstream, bringing nutrients to floodplain soils, maintaining floodplains and deltas that protect against extreme weather events, and providing recreational opportunities or spiritual fulfilment. Almost everywhere that free-flowing rivers remain, they are home to vulnerable freshwater biodiversity. Dams and other infrastructure threaten these free-flowing rivers as they create barriers, causing fragmentation and alteration to flow regimes. Dams also affect longdistance migratory fishes by obstructing their migratory pathways, making it difficult or impossible to complete their life cycles.

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The Project will also have political impact. Moldova is concerned about Ukraine's plans to implement the Project that will restrict Moldova's access to water resources, especially during the dry-water period.

The public is totally against the Project.

WWF insists:

- Before developing plans to increase Ukraine's hydropower capacity, we need to take into account the goals of sustainable development and priorities for our nation.
- Compliance with international obligations should also be guaranteed.

June 7, 2017, Ukraine ratified the Treaty between the Cabinet of Ministers of Ukraine and the Government of the Republic of Moldova on cooperation in the field of protection and sustainable development of the Dniester River basin, concluded November 29, 2012 in Rome (the Treaty was ratified by Law No. 2086-VIII as of 07.06.2017)

- The social, environmental and energy needs of the region should be considered transparently and in detail. And special attention should be paid to the field of energy saving and improvement of energy efficiency.
- In order to reduce social tension in the region, which is related to plans to build a cascade of the Upper Dniester HPPs on the Dniester river, the opinion of local communities needs to be taken into account.
- The Program 2026 should be reviewed and approved transparently, and in accordance with the current legislation, be subject to strategic environmental assessment with involvement of all stakeholders and the public. The Project should be withdrawn from the Program 2026. Any Project implementation works should be terminated.

References:

Excerpts from the letter of the Ministry of Environment. Letter №5/ 1-8/6360-16 as of 06.07.2016:

"The Ministry of Environment and Natural Resources of Ukraine has considered the draft decree of the Cabinet of Ministers of Ukraine "On approval of the Hydroenergy Development Program until 2026", developed by the Ministry of Energy and Coal Industry, and informs the following:

.... we cannot agree to the plan to build the Upper Dniester HPP cascade envisaged in Section 5.8 of the draft Program....

In case this construction is implemented, all river course and adjacent natural complexes of "Dniester Canyon" National Nature Park, parts in the natural complexes of "Khotynsky" National Nature Park and Galician National Nature Park, and a number of other nature reserve fund sites of other categories will be destroyed.

Territories of the aforementioned national nature parks are planned to be included in the Emerald Network of Europe whose creation on the territory of Ukraine is provided by the Association Agreement between Ukraine and the European Union. Damaging the natural condition of these sites can lead to non-fulfillment of Ukraine's obligations to the EU ..."

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