



SUMMARY of the Review of Environmental Impact Assessments for hydropower plants in Valbona Valley National Park, Albania

The objective of an environmental impact assessment (EIA) is to identify and assess possible impacts that a project may have on the environment (either from its construction or operation), before any decision is taken to allow such a project to proceed. This process needs to ensure the participation of environmental authorities and the public in the decision-making procedures. In particular, members of the public concerned must be given the opportunity to comment on any proposal while all options are still open. When approving a project, the competent authority is required to take into consideration the results of consultations and to inform the public, notably on the measures envisaged to avoid, reduce or compensate for environmental impacts. The public must be informed of the development decision and can challenge it before the courts¹.

The aim of the Review² was to analyse whether the Environmental Impact Assessment Reports for hydropower plants on Valbona River and on the Dragobia Cascade adhere to basic principles of good EIA practice³ when claiming to have achieved the following:

- Identification of the real impacts of proposed activity on human setting;
- Analysis of all positive and negative environmental factors;
- Recommendations for mitigation measures and minimization of negative impacts on the environment.

The Review concludes that EIAs are clearly sub-standard and should not have been used as the basis for approving any development, particularly in a National Park category of protected area. They fail to follow good EIA principles in the following categories of assessment:

- **Focus.** Process does not concentrate on environmental effects and issues.
- **Credibility.** Process was not carried out with professionalism, rigor or objectivity. Independent verifications were insufficient.
- **Integration.** Process failed to address social, economic and biological interrelationships.
- **Participation.** Process did not demonstrate involvement of interested public, or include public input.
- **Systematic Approach.** Process did not consider all relevant information regarding all aspects of environment, nor consider alternatives, nor consider monitoring of effects.
- **Transparency.** Process did not include clear requirements for EIA content, ensure public access to information or acknowledge limitations and difficulties.

¹ European Commission. Interpretation of definitions of project categories of annex I and annex II of EIA Directive (2015).

² The Review was conducted by Integra Consulting and subsequently summarized by WWF Adria and TOKA, for easier reading. For further information or access to full reviews please contact either Petra Remeta (premeta@wwfadria.org) or Catherine Bohne (catherine@journeytovalbona.com).

³ Based on the European Commission Guidance on Review of Environmental Impact Statements (2001) as well as the International Association for Impact Assessment (IAIA) principles (2016).

Failure of the EIAs to adhere to the above principles is demonstrated through the overall failure to appropriately tackle the following basic aspects of a satisfactory impact assessment.

Professional standards. EIAs **do not document sources** for any information (hydrology, environmental or biological) on which all statements are based. No authors, research citations or references are given, and it is **impossible to tell** whether any experts were in fact consulted at all, at what point in time, with what qualifications.

Scope of assessment. EIAs focus only on the plant construction area and **do not include** the entire impact area which must be considered. Specific design plans are not given (e.g. tunnel, powerhouse design, access roads, power lines), thus **no assessment** is made of their impact (which may be significant, as it may potentially affect a much larger area than the plants themselves). There is **no consideration of alternative options**, including the baseline “no development” option. Thus no assessment has been made of whether this is the best possible project and design. Also, no reasons are given for the choices made in project design.

Biodiversity. The description of habitats, fauna and flora are **completely inadequate**. They lack focus and depth, and do not use an established standard terminology that is normally used in any professional report by experts educated in fields related to biology or ecology. Effects on fauna, flora and habitats are **not described or quantified**. However, when references are made to possible effects then such statements contradict each other.

Water. Effects on hydrology and water quality are **not described or quantified**. Contradictory statements are made (e.g. removing majority of water from 3km of riverbed will not have any effect, as water is ultimately returned to the riverbed is later contradicted by saying that water environment may be negatively affected). Minimum flow to be maintained is defined as 15-22%, but it is **unclear** whether this is average annual flow or dry season flow. In any case, the effect on the environment of the “significantly reduced river flows” is **not assessed**, including potential impact on the “outstanding cultural and tourism values” of Valbona Valley.

Local communities. EIAs **do not provide a proper record of consultation** with all relevant stakeholders, including local communities. Only a basic assessment of local employment is made (“a lot of unemployed persons will be employed”), but **no figures or predictions** are given beyond general statements. There is no information on potential adverse impacts on local tourism employment caused by the reduced natural status of the area.

Monitoring and mitigation. There is **no study of the baseline environment**, thus no way of monitoring ongoing impact. A simplistic and inadequate list of potential impacts is missing crucial information on the “geographic extent, duration, frequency, reversibility and probability of occurrence”. Proposed plans to monitor and manage residual impacts on fauna and water ecosystems are **deficient** (e.g. necessity to “re-populate the environment with animals and birds” is later contradicted by denying any negative impacts on fauna). **No commitment** is made to mitigate significant adverse effects on key aspects of environment, as not even any adverse effects are identified.