



POSITION  
PAPER

APRIL

2016

The Organization to Konserve the Albanian Alps

T O K A *valbonë*



# Hydropower development in Valbona National Park, Albania

National parks are extremely valuable nature areas and structures such as dams and reservoirs for hydropower, which would in any way compromise natural values, should not be allowed in these areas. In Albania this is often ignored and hydropower generation capacities are planned and developed regardless of the protection status of an area or conservation value of a river. Valbona National Park is one such case.

Furthermore this National Park is also the latest example of unsustainable hydropower development practices in Albania. Non-transparent decision making and disregard for local communities' well-being are manifested in the environmental impact assessment's procedure and content, including inadequate public consultation, lack of comprehensive biodiversity assessment and complete disregard of the fact that the development is occurring in a protected area.

# DESCRIPTION OF THE PROJECT AND VALBONA NATIONAL PARK

Valbona National Park comprises 8,000 ha located in northern Albania and has been an IUCN Level II protected area since 1996. The entire area is part of the Emerald Network, the ecological network made up of Areas of Special Conservation Interest designated under the Bern Convention. In January 2016 application was made to UNESCO for recognition of the virgin European Beech Forest of upper Gashi Valley as a World Heritage Forest. Valbona NP is planned to be designated as Natura 2000 site and legislation is currently being drafted to make it part of the new 86,000 ha “National Park of the Albanian Alps”. This park will share borders with Montenegro's Prokletije National Park and Kosovo's Bjeshket e Namuna National Park thus creating one of the largest cross-border protected areas in the Balkans<sup>1</sup>.

This protected area, which is also a significant eco-tourism destination<sup>2</sup> and is one of the top 3 tourism attractions in Albania, is currently threatened by



hydropower development. It is extremely difficult to determine the exact number of HPP licenses that have been granted in Valbona NP. A construction of a small 4 MW plant “Valbona HPP” has begun in 2013. In January 2016 the local population learned of plans to begin construction of 2 cascade plants (Cerem and Dragobi, which together are referred to as Dragobia

Cascades) which will total 27 MW. In February 2016, it became known that this project is part of a bigger 4 HPP/51 MW scheme concession. In March 2016 (after being assured by NEA that there were no further projects) the locals learned of the “Valbona Project Company” which holds a license for an additional 9



HPP on Valbona River, 3 of which are wholly within the protected area. News of additional companies has come to light (“Hydro-Valbona” and “Wonder”) but no information has been obtained to date regarding planned activities.

<sup>1</sup>Ministry of Environment of the Republic of Albania. Draft Management Plan for National Park of the Alps. 2015-16. Not available online.

<sup>2</sup><http://www.journeytovalbona.com/>

# ACTUAL SITUATION AND CONCERNS

After analysing environmental impact assessment available for the Dragobia Cascades project, independent experts<sup>3</sup> indicate the following problems:

- **Poor project design and planning.** Project design is based on river discharge of 12.66 m<sup>3</sup>/s, but elsewhere the developer reports that the river maximum flow is only 7 m<sup>3</sup>/s and around 3 m<sup>3</sup>/s during dry months. Hydrology data is out of date and although power lines and roads are drawn in licensing maps, no description of their construction parameters or impacts is made.
- **Biodiversity not properly assessed.** EIA offers no detailed analysis of species and habitats in the area; moreover, species regularly seen in the NP are not even mentioned. EIA doesn't refer to the area's "protected" status, and doesn't mention the conformity with Bern or Espoo Conventions nor with EU Habitats and Bird Directives.
- **Development did not meet legal deadlines.** The EIA was based on the outdated legal requirement from 2003 instead on the new Law No. 10440 that has already been in effect. Furthermore, the project missed the 2 year deadline to start construction works, so the environmental license should automatically be invalidated and the process of the new EIA started.
- **Public consultation inadequate and ineffective.** A page with 20 signatures from one small village was submitted as evidence of EIA public consultation (valley is a home to over 1.000 people), implying that the potentially affected persons were not adequately consulted. Importantly, the petition among locals against the HPP development, gathered 94 signatures as of 08 March.
- **No consultation with the neighbouring countries.** EIA makes reference to the "creation of roads through virgin territories" to Montenegro, which is not part of licensing documents. The intent to construct a major road route to Montenegro, delivering increased auto traffic to Prokletije National Park, implies transboundary impact and requires consultation with Montenegro under the Espoo Convention.



<sup>3</sup> Prof. Dr. Ferdinand Bego (zoologist), Dr. Abdulla Diku (forestry expert), Dr. Ermelinda Mahmutaj (biologist), Msc. Olsi Nika, Prof. Dr. Anila Paporisto (invertebrate zoologist), Prof. Dr. Lulëzim Shuka (botanist), Prof. Dr. Spase Shumka (ichthyologist)

# RECOMMENDATIONS

During the period 2005-2013 more than 435 concessions for small HPP projects were awarded on pristine rivers and inside protected areas, even when they have negative socio-economic and environmental impacts. At the same time, Albania is identified as the Balkan country **most at risk by climate change**, with predictions that HPP production may fall by as much as 60% due to the reduction of rainfall and water tables, thus making **hydropower extremely unreliable source of energy in the future**<sup>4</sup>.

Protected areas, and especially **national parks, are extremely valuable conservation areas**, set aside to protect large-scale ecological processes, species and ecosystems characteristic of the area, which also provide a foundation for sustainable development. Structures such as **dams and reservoirs for hydropower** and other purposes which would in any way compromise the purpose of a protected area **should not be allowed in national parks**<sup>5</sup>.

## WWF and TOKA ask the Government of Albania to:

- (1) **Immediately stop all hydropower construction** in Valbona National Park;
- (2) **Nullify existing licenses** for all hydropower development in Valbona National Park, as this IUCN category II protected area is designated in order to protect large-scale ecological processes, species and ecosystems, which will be destroyed if hydropower development proceeds;
- (3) **Align and improve national regulatory framework** with all the EU's standards and rules, in accordance with the accession process.

## WWF and TOKA ask the international community present in Albania to:

- (1) **Provide support to the process of aligning Albanian legal framework** and development practices with EU directives and international conventions;
- (2) **Demand full and proper implementation** and inter-sectorial coordination to ensure that proposed development does not compromise objectives of and activities put in place for nature protection.



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<sup>4</sup> World Bank Group, The Climate Challenge for the Western Balkans, 2014 / UNEP, Climate Change in the West Balkans, 2012.

<sup>5</sup> First World Conference on National Parks in 1962 (Ravenel and Redford, 2001).