



“Balkanka” Association, Sofia, Bulgaria
“Nature has all the time in the world, we do not”.

POSITION

SUBJECT: ENERGY SECTOR STRATEGY
DEVELOPER: EBRD
STAGE: DRAFT SEPTEMBER 2018

We welcome the Energy sector strategy of the EBRD draft September 2018, focused on transition away from coal and all other efforts aiming to achieve the climate goals. However, having huge experience with hydropower in particular, we have some general notes we would like to share with the bank's decision makers:

1. **In the Key sector drivers** of the Strategy not only the concerns about air quality must be taken into consideration. Another big issue of a great importance is the quality of water. In this context the policy of further hydropower development should be reconsidered, especially when drinking water sources are possibly affected, because in Bulgaria we have several such cases. In line with EU water policy, pure drinking water is The Key Issue that will encourage people to use tap water instead of bottled water, thus reducing plastic use and garbage on the road to low carbon economy. Plastic waste is actually another big problem equivalent to air pollution or maybe even worse.
2. In this context, as acknowledged on page 9 of the ESS, access to affordable clean energy is an issue alright, but it should not be achieved at the expense of losing pure water sources any further.
3. **As far as climate change is another recognized key driver**, it should also be taken into account that climate change will only increase the river runoff irregularity all over the world, therefore hydropower will become less and less reliable energy source. There is on page 13 a recommendation only for hydropower dominated systems/regions to be enhanced by introducing wind and solar which is good, but the same is applicable to regions that are not dominated by hydropower yet - when they become dominated then it will be too late.
4. It must be acknowledged that for the sake of hydropower dried up to the bottom riverbeds are not of any help to mitigate the climate change effects, but on the contrary. Natural running rivers are part of the Planet's cooling system therefore the contracts must hold severe precautionary measures to be undertaken against those hydro developers who would not comply with the Residual flow requirements. Options for precise measurement and control of the Residual flow must be another key issue to be guaranteed as well.
5. At the same time, with the advent of climate change riverine ecosystems will become more and more vulnerable to higher water temperature along with the reduced natural river flow. Thus all requirements on the Residual flow that has to be released below water catchments need thorough revision and further disruption of river bio corridors must be abandoned.
6. In line with *Hydropower and Natura 2000 Good practice guide* of the EU, in protected areas within the boundaries of the Natura 2000 network hosting priority habitat types and priority species listed in *Annex 2* of the EU Habitats Directive, and in the Emerald

sites outside the EU as well, decommissioning of old and obsolete hydro units with proven adverse impact on nature must be encouraged and the EBRD is very welcome to do that.

7. **As far as air quality is concerned:** in the ESS fugitive greenhouse gas emissions are addressed in the context of oil and gas extraction. However, hydropower dams are other proven big emitters of methane. The older the dam, the more the emissions, especially if water is polluted and contaminated due to other industrial activities upriver. Therefore, new hydropower developed in river sections with polluted water must be avoided by all means. Series of dams totally eliminate the river self cleaning ability and turn the rivers into chains of swamps, therefore cascades should not be allowed at all. In this context the EBRD itself has done its own mishap in Bulgaria with the VEC Svoge investment, a mistake that shouldn't be repeated and must not be multiplied elsewhere.
8. Based on the above, the Key efforts concerning hydropower throughout Europe must be focused on reconstruction and modernization of existing old and obsolete hydro units thus improving their performance, instead of commissioning new ones.
9. Finally, many old hydropower dams all over Europe currently are ticking ecological bombs with delayed detonation due to accumulation of more or less toxic silt deposits that will need to be properly disposed of somewhere some day, sooner or later, but not too long from now. Obviously water quality improvement in line with EU WFD will require all kind of river restoration measures including decommissioning of old hydropower dams the EBRD is also very welcome to support.

There are two main factors life on Earth depends on - air quality and water quality. Therefore we hope that the Water Quality issue will be addressed as a Key driver in the ESS as well, and that at least some of our notes will be included in the Strategy Section 1.3 *Implementation of previous strategy - lessons learned*.

Specific issues concerning hydropower development and practice in Bulgaria, proving that the whole territory of the country should be considered *No Go zone* for further hydropower development in the future, supported by the most respectful scientific institutions in the country, are described in a separate document.

Thank you for your kind understanding and cooperation.

"Nature has all the time in the world, we do not".

Place, date and signature of representative:

Sofia, Bulgaria
16.10.2018



/dipl.eng.Dimitar Koumanov/

IDENTITY AND CONTACT DETAILS

1. Name:

“**Balkanka**” Association, Sofia, Bulgaria

2. Sector / field of activity and location(s) where active:

" Balkanka " Association is a non-profit, non-government organization, registered in Bulgaria for action in public benefit, on 07 August 2013, company file 203/2013 of the Sofia City Court, UIC 176566443. The main objectives of “Balkanka” are protection and conservation of river biodiversity, with a focus on conservation and restoration of indigenous Balkan brown trout */salmo trutta/* populations in Bulgarian rivers.

3. ADDRESS OR REGISTERED OFFICE

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