

IRREGULARITIES DURING THE CONSTRUCTION OF MINI HYDRO POWER PLANTS ON CRNJA, LJUBUSTICA AND CRNI POTOK RIVERS

Increased number of pipes, enlargement of pipes diameter and endangered species forgotten about

According to project documents of accepted Elaborate, based upon which the construction permit had been issued on 9 December 2011 and regarding the pipeline (going from water intake to mechanical building for “Crni Potok”), a Mini Hydro Plant, had originally planned the use of pipes with 56 cm in diameter. Pipeline on the construction site itself was 81 cm in diameter and same pipes had been installed throughout the water streams. However, during the inspection supervisory control, where the local community members claimed that the official and authorized inspector had visited the water intake area only, it was concluded that 50 cm pipes were installed (used for temporary water drain from water intake), so the construction works could carry on and continue without obstructions and interrupting.

Author: Vuk VUJISIĆ

For almost three months, local community members from Bara Kraljska, accompanied by environmental protection activists, have been protesting against the construction of mini hydro power plants (mHE) on Crnja, Ljubustica and Crni Potok Rivers.

The text on the official construction board, placed some three kilometers from the construction site of “Crni potok” mini hydro power plant, stated that the construction works had commenced on 16 December 2011 and that the deadline for completion of works was 30 November 2016. Crni potok” mini hydro power plant was however not completed even four years after this particular deadline. The works re-commenced and were intensified around July 2020, but, after the complaint and protests organized by local community members, works had been terminated on July 26, only six days after they had begun and they haven’t continued ever since. There were though attempts by the construction company to carry on just before the election of the new Government but the members of the local community were firm to stop further construction works although they faced high pressure from NKT (National Coordination Body established to fight the Corona epidemics) and police.

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Members of a local community every week have been outlining numerous irregularities and discrepancies regarding this particular case and they have already informed representatives of the new Government with the issues and we shall reveal and release the most crucial ones further down this article.



Construction site photo Source: PCNEN Photo: Vuk Vujisić

Čestogaz

“Crni potok”, water intake (hydroelectric dam) whose construction had started, according to a decade old project (again deriving from the Elaborate) based on the evaluation of the impact on the environment, should have been constructed at 1 206 meters altitude (quota) where it should have accumulated water from Crni Potok River which again, according to members of local

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community, flows into Cestogaz which further flows into Ljubastica (confluence of Crnja River). This basically means that commenced water intake would not gather water from Crni Potok River only (as it clearly states in the Elaborate), but also from even larger Cestogaz stream which flows into Ljubastica with Crni Potok River being its confluence. Local community members therefore reckon that Cestogaz (which is not mentioned in the project documents as Ljubastica confluence at all) is being ripped off”

- Crni potok is indeed mentioned in project documents, while Čestogaz is not mentioned anywhere. We all know that Crni Potok River flows into Čestogaz (not the other way around) and with this constellation we could conclude that the state budget is clearly being damaged and plundered. - claims **Vladimir Novović, a member of a local community.**

Pipe diameter

According to project documents of accepted Elaborate, based upon which the construction permit had been issued on 9 December 2011 and regarding the pipeline going from water intake to mechanical plant for “Crni Potok”, a mini hydro power plant, had originally planned pipes with 558.8mm (56 cm) in diameter. Pipeline on the construction site itself was 81 cm in diameter and same pipes had been installed throughout the water streams. However, during the inspection supervisory control, where the local population claimed that the official and authorized inspector had visited the water intake area only, it was concluded that 50 cm pipes were installed, used for temporary water drain from water intake, so the construction works could carry on and continue without obstructions and interrupting.

“Construction site was first visited by an inspector for water issues, shortly followed by construction inspection officials. They appeared without further notice and we were already there. It was then no surprise that 50 cm pipes were registered into the Report book, bearing in mind that the inspector only visited the water intake site, claimed Novovic. He also added that the inspection have not replied, responded and sent their decisions yet.

Novovic outlined that this issue represented yet another subtle “theft and robbery”, because water pipes with bigger diameter were to be installed which we had clearly witnessed. By visiting the site we have seen that construction works would commence with 81 cm water pipes.

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Water pipes on stock at Bara Kraljska construction site

Permit expired

Decision issued on 9 December 2011 clearly stated that the investor shall terminate with construction works pursuant to previously issued permit, unless the construction works commence within the period of two years starting from the date of permit issuance – Article 97 of the Law on Spatial Planning and Construction of Structures. Members of a local community claimed that the investor commenced with construction works in 2017 and that the permit must have been canceled accordingly.

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- This permit should have been cancelled since we witnessed that the construction works did commence in 2017 only by the mechanical plant and construction plan table and that the construction works stopped afterwards. However, yet another manipulation emerged claiming that the investor had started with works in 2012 which is not true as we all knew. Furthermore, most inspection reports have been falsified and forged and someone should be held responsible for that, emphasized **Milovan Labovic**, president of Bare Kraljske local community council.

Local community members demanded the cancellation of construction permit and ceasing of concession contracts. With the help and legal aid assistance provided by the CGO (Center for Civic Education), local community council filed in a request to Montenegro Government official authorities. However Ministry of Sustainable Development and Tourism (*hereinafter* MORT) have brought a decision claiming that local community council's complaint had no legal foundations and that disputable permits had been legally issued and were therefore valid. After receiving this decision, the CGO had, on behalf of local community, pressed charges to Montenegro Administrative Court.

- We reckon that the issued construction permits contained various irregularities. We submitted the recommendation to Montenegro Government official authorities demanding the cancellation of issued permits. However the MORT brought a decision rejecting our proposal. MORT official refusal did not contain a single valid reason causing the rejection of our proposal, which was exactly why we decided to press charges against them with the Montenegro Administrative Court. There were countless irregularities and we therefore invited the Montenegrin Government official authorities to accept the claims of local community members and cancel the contracts, claimed **Snežana Kaluđerović**, a senior legal expert at the CGO.

Construction site works did not follow elaborate instructions

During the visits of construction site (during the period of first few months), the water flow at the water intake was mainly going through temporary 50 cm water pipes with water falling from two meters height. Locals claimed that this water flow endangered fish passage, since river fish were unable to move around the water undisturbed. Additionally, this type of construction works was, according to elaborate instructions, completely forbidden.

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But, after severe rainfalls, the temporary channel (which re-directed water flow into the water pipes) collapsed and Cestogaz now flows over water intake without any obstructions. Couple of days ago, locals recorded a stream trout at the water intake area. Consequently, we asked **Omar Basic**, president of Fishing Association of Montenegro how mini hydro power plants could make an impact on fish fauna.

- Total quantity of water, that is, water level in riverbeds has the biggest impact (both negative and positive), on fish fauna, lives and movement (including other water creatures). Mini hydro power plants, along with their water intakes that are built within riverbeds; re-direct large water quantity from riverbeds that further, through water pipelines, flows into mechanical plants”, Mr. Basic explained.

According to his words, during the minimum water level period, there have been a limited number of concessionary parties, that is, the entrepreneurs that obey legal regulations in regard with providing and ensuring a water level during the minimum of natural and biological water regime.

He added that mini hydro power plants entrepreneurs are mostly concerned about every single drop of water so they could produce more kW of electric power. In some rivers we could see completely dried out riverbeds and fish and other water creatures can simply not survive in these rivers.

Looking thoroughly at this particular issue, all mini hydro power plants have negative impact on fish fauna and other water creatures, particularly in parts of water intakes that have been “bypassed” by water pipelines from water intake areas to re – direction of water to riverbeds, behind mechanical plants. It is not unusual that same water flows downwards towards new intakes and water pipelines to next mechanical plants, thus endangering the entire ecosystem throughout the whole year. In these river parts, animal life is indeed endangered or has already faded away. Mr. Basic replies to the question on how fish passage can solve this problem:

- Technical solutions concerning fish passage are mostly useful, however, they would be useful only if fish passages and downstream of further river flow has had sufficient water quantity in riverbeds and in fish passages as well, so river fish could therefore move in undisturbed way and without any obstructions. However, entrepreneurs on one hand, build fish passages only to drain away extra quantity of water during the period of vast

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water - level, while on the other hand, during the period of medium or minimum water – level, fish passages are not used what they are built for, because during their building, entrepreneurs cautiously paid attention to having as much water as possible directed into drain channels and water pipelines, rather than being directed into fish passages. Constructed fish passages represent merely a “smoked screen” and serve as pure formalities, in terms of meeting legal requirements, as far as mini hydro power plants procedures are concerned, because the truth does not flow and fish cannot move upwards, claimed Basic.

He also claimed that fish passages were in most cases completely useless.

“Also, most fish passages have sloped wise elevations which makes it difficult for smaller fish species to travel and move, and it especially makes for other water creatures more difficult to move, taking into consideration that only water flows through these passages. Also, no fish passage has been built so local fish and other water creatures could actually resemble natural and genuine riverbed and surrounding that would actually make fish and similar water creatures move without fear and travel freely, Mr. Basic highlighted.

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Čestogaz and Ljubaštica Rivers joint

Elaborate discrepancies

Despite the fact that the Elaborate (although it had by then been old for over a decade) had been returned for further re-corrections, expert reckoned that it contained numerous discrepancies, due to the fact that it did not go thoroughly through required details, including zero situation analysis and detailed and précised testing.

Vuk Ikoivic, a biologist with the KOD organization stated that allowing and permitting such construction works, at the same time represented sever violation of legal regulations regarding

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sustainable management of natural resources and preserving of flora and fauna (animal life) both at state and international level. If the Environmental Agency had obeyed state legal regulations, no permit concerning the construction of derivation – based small hydro power plants would have ever been issued.

In any state where legal regulations are obeyed and followed, this particular elaborate would have been withdrawn and all entities involved in its creation would have legally been processed. At the end, why do citizens of Montenegro pay the taxes through which inspection and judiciary official authorities get paid, when they often fail to respond and react to such criminal deeds, Ikoćić wanders and reminds that the Elaborate must contain zero situation, which was obviously omitted and that it must comprise of serious studies, rather than speculations and unprofessional presumptions.

Darko Saveljić, also a biologist shares similar opinion

“I reckon that mini hydro power plants in Bare Kraljske should not be constructed based on the existing documents, because key documents that permitted the commencement of construction works (namely the Elaborate of impact on the environment) was not created and tailored in accordance with the existing law. Furthermore, it had been returned to its original creators twice for re-corrections and re-conformation and it has still been considered as very poor quality document”, Saveljic estimated.

“Estimation assignment regarding the impact on the environment was to create a zero animal life situation, including fauna (plants), mushrooms, state and soil condition, climate, water, air, etc. It should have evaluated the impact of the investment in relation with the above listed priorities, as far as zero state is concerned. In this Elaborate, a biodiversity of planned future nature park has been analyzed on merely two pages, without mentioning of amphibians, mammals, crawlers and birds, while flora also took one of the two pages”, Saveljic added.

Protected species forgotten

“During the site visiting at the very edge of water intake we recorded s salamander on our camera (*Salamandra Salamandra*), an endangered and protected animal species. This would have not seemed as usual occurrence, but this very and rather rare animal sort was indeed mentioned in Elaborate, which additionally opened room for yet another issue concerning other

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protected animal species whose lives may have been subject to impact resulted and caused by the construction of mini hydro power plants. This has indeed displayed a serious oversight in document creation”, scientists claimed.



“Small hydro power plants cause the disappearance or decimation of salamanders. These projects primarily have negative impact on animal life whose life habits are bound to water life and who spend most of their lives, including their activities, in local waters. This is exactly the case with local salamander types”, explained Ikovic.

According to his words throughout Montenegro and due to numerous impacts, centers for salamander egg laying have also disappeared.

“Snow is melting faster than before, falls emerge unexpectedly and are unbalanced, water entities often dry out and the occurrence of land drying has become more frequent due to

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urbanization processes. Consequently, the number of these particular animal species has decreased during the period of last 50 years. Small hydro power plants have made additional impact on their decline and have therefore increased their vanishing. As the opulence of a human local community directly depends on eco system and its species so the loss of fauna (animal world) would reflect on local economy as well, Ikovic continued.

He added that salamanders cannot survive on planned economic minimum of 10% of water flow and that Environmental Agency for Protection of Flora and Animal life should take full responsibility, as far as this sensitive issue is concerned.

“Out of 845 protected species in Montenegro, the elaborate creators outlined one animal sort only; namely leech. Zero state has not been created and clearly specified in elaborate and we shall therefore have absolutely no knowledge concerning the impact of this specific project on fauna and animal life”, Saveljic warned.

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7.5.1.2. Uticaj na endemične i zaštićene vrste u zoni direktnog uticaja planiranog zahvata izgradnje hidroelektrana u slivu rijeke Crnje

Na području koje će biti izloženo direktnom uticaju nema endemičnih vrsta koje su stenoendemične za dato područje (odnosno, da žive samo u rijeci Crnji) i koje su opisane sa ovog mikrolokaliteta. Međutim na području zahvata mogu se naći sledeće endemične vrste:

Vrste *Partnunia naprintua* Gerecke i *Partnunia puritana* Gerecke – locus typicus za obe vrste je Trešnjevik i vrsta *Partnunia naprintua* se može naći u rijeci Crnji. Obje vrste preferiraju reohelokrene izvore bogate sa pijeskom i mahovinom (vidi Pešić i sar. 2010) tako da planirani zahvat neće značajnije uticati na njihove populacije.

Vrata Dina minuoculata, jedna od najkrupnijih Evropskih pijavica, endemična vrsta opisana od strane Prof. Grosser i Prof. Pešić, u svoj areal uključuje i područje Komova. Ova vrsta neće biti izložena negativnom uticaju planiranog zahvata jer je ekologijom vezana za ekoton.

Od vrsta koje su zaštićene zakonom (Uredba o stavljanju određenih biljnih i životinjskih vrsta pod zaštitu rješenjem Republički zavod za zaštitu prirode, Službeni glasnik RCG br 76/06a) a koje mogu biti izložene eventualnom uticaju treba posebno spomenuti vrstu *Dina lineata* (endemična podvrsta *Dina lineata montana* je opisana sa područja Komova). *Dina lineata* se može naći u rijeci Crnji u zoni izloženoj direktnom uticaju. Ova vrsta po svoj prilici neće pretrpjeti značajniji uticaj koji bi doveo do značajnog ugrožavanja njene populacije jer je ekologijom vezana za ekoton, a može preživeti i u lentičkom planinskom staništu.

Od ostalih vrsta koje se eventualno mogu naći u zoni izložena direktnom uticaju je vrsta *Atractides longisetus* opisana od strane Pešić (2002). Ova vrsta je vezana za gornje djelove potoka (bliže izvorišnom dijelu) tako da se može očekivati da neće pretrpjeti značajan uticaj.

7.5.2 Gubitak i oštećenje geoloških, paleontoloških i geomorfoloških osobina

U toku izvođenja i eksploatacije projekta neće doći do gubitka i oštećenja geoloških, paleontoloških i geomorfoloških osobina. Lokacija objekta ne pokriva nalazišta minerala, paleontoloških i mineraloških pojava koje su ili bi trebalo biti zaštićene.

Podgorica, januar, 2011.god.

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7.5.1.2 Impact on endemic and protected species in the zone of direct impact of planned project of the construction of hydro power plants at Crnja River watershed

In areas/sites that will directly be exposed to impact, there are no endemic species that are considered as steno-endemic species for this particular area (that is, that they live in the Crnja River area only) and that have been described and outlined in this specific micro – location. However, the following endemic species can be found in this specific area:

Species such as *Partnunia naprintua* Gerecke and *Partnunia puritana* Gerecke – locus, typical for both species is Tresnjevik and *Partnunia naprintua* can be located in Crnja River area. Both species prefer reocrenous sources rich in sand and moss (Pasic and associates, 2010), so the planned operations shall not make a significant impact on their population.

Vrata Dina mainuocolata, one of the most popular European leech types, endemic specie described by professors Grosser and Pesic, includes the area of Komovo, as part of its habitat. This type shall not be exposed to negative impact of planed operations because it is bound to ecotone thought ecology.

From all species protected by the Law (Provision on declaring certain plants and animal species under the protection – Decision passed by the Republic of Montenegro institute for protection of environment, Official Gazette RCG No. 76/06a) which can be exposed to eventual impact must be particularly outlined, *Dina lineata* (endemic subtype *Dina lineata montana* is described as the endemic type from Komova area) must be especially highlighted. *Dina lineata* can be found around Crnja River area in the zone directly exposed to impact. This type shall most probably not experience significant impact that would additionally cause more notable endangering of its population, because it is bound to ecotone thought ecology. It can also survive in lentic – mountain habitat.

Atractides longisetus has also been described as the other species type that may eventually be found in the zone exposed to direct impact. It was described by Pasic (2002). This particular animal sort is bound to upper areas around the stream (closer to stream source) so it is expected that it shall not experience significant impact.

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7.5.2 Loss and damage of geological, paleontological and geomorphologic characteristics

During the execution and exploiting of the project there shall be no losses and damages geological, paleontological and geomorphologic characteristics. Object site (location) does not cover the sites of mining, paleontological and mineralogical emersions (instances) that are or should be subjects to protection.

Podgorica, January 2011

Discrepancies and irregularities in Elaborate have best been displayed with two, rather relevant and expert – based addresses that decided not to express their expert opinions openly and in public, due to their relationships with elaborate creators, but also due to possible pressure they may eventually be imposed with.

Dr. Pesic claims that disrespect of measures from the Elaborate suggests corruption

One of the authors of the Elaborate on environmental impact assessment, Dr. Vladimir Pesic said for the PCNEN interview that the existing laws at the time did not require the study of a “zero state” and the Elaborate was done from the existing literature and he was compensated with few hundred euros.

The Elaborate was done in 2010. Why is it important when the study is done? Because at that time, the law did not require a study to be done beforehand, that is study of the so-called “zero state” of biodiversity. The obligation to do a zero state of biodiversity before an environmental impact assessment is done is of more recent date. At that time, I was hired by a company that was assessing the impact of the construction of small hydropower plants on the environment to do a survey of flora and fauna for some 250 or 300 euros, based on what is known from the scientific literature with special emphasis on endemic and relict species, explained Dr. Pesic.

Pesic believes that it is necessary to prepare a new Elaborate that the competent authorities are responsible for non-compliance with the measures from this existing one, which must ensure compliance with the measures and recommendations in order to avoid environmental damage.

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“I believe that there is a need to make a new Elaborate, first of all because then the Elaborate was not done, that is a “zero state” study of biodiversity. There is a great possibility that research, preceding such an intervention, would lead to data on the presence of certain protected and even endemic species, the protection of which would necessarily require proposing conservation measures for their protection, which, after all, is one of the goals of the impact assessment, ” Pesic said.

The officials from the Environmental Agency, including the MORT officials, claimed that everything was done pursuant to legal procedures and possibilities provided while new Government is investigating all irregularities and documents related to mini hydro plants cases in order to reach decision to terminate the concession.

One thing is certain, local community members sent a clear message that they will not give up and they will keep their local rivers intact, regardless to everything and no matter what the governing authorities would have to say and respond.

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