



NATIONAL ECOLOGICAL CENTRE OF UKRAINE

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To: Mr Alistair Clark, Corporate Director, Environment and Sustainability, EBRD
Ms Nandita Parshad, Director, Power and Energy Utilities, EBRD

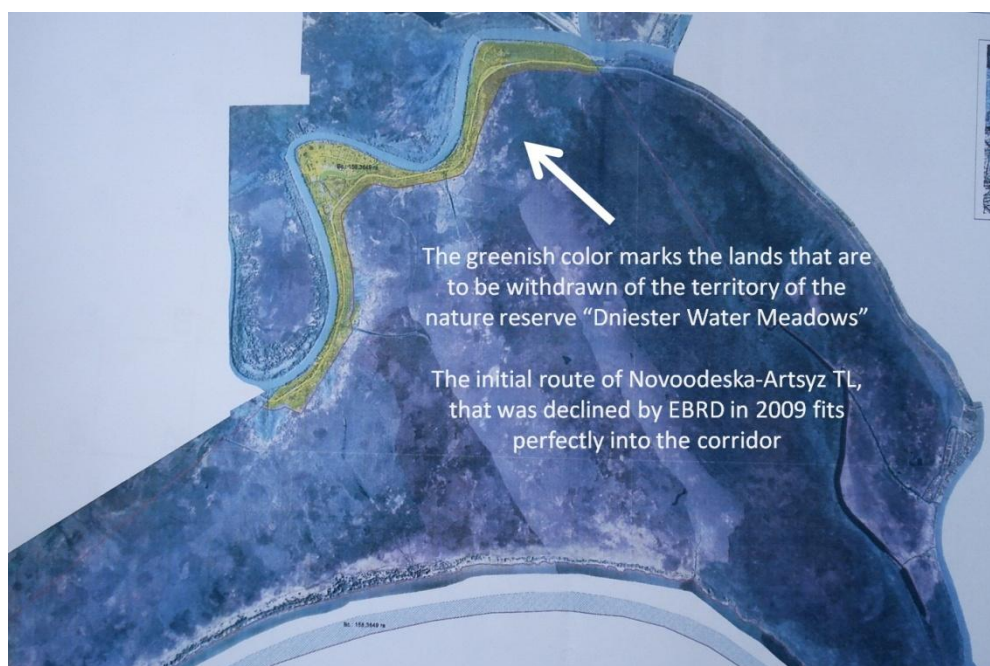
Dear Mr Clark, Dear Ms Parshad,

We, the undersigned public environmental organisations of Ukraine, hereby express our concerns with the planned construction of 330 kV Novoodeska – Artsyz overhead transmission line by the National power company Ukrenergo. Ukrenergo is considering constructing the transmission line through the wetlands of the Dniester Delta, a sensitive nature site protected by nationalⁱ and internationalⁱⁱ environmental legislation.

It is expected that the project is to be supported by the EBRD. Back in May 2009 twenty five Ukrainian NGOs protested against the plans of Ukrenergo to start construction of the transmission line through the wetlandsⁱⁱⁱ, at that time the EBRD required the project sponsor to develop an alternative routing before it would further consider the project.

However, instead of concentrating on finding more environmentally sustainable alternatives, Ukrenergo preferred to focus its efforts on eradicating the obstacles in the way of the project – namely the status of protected area of the wetlands. In February 2013 the Council of the Odessa region announced a decision to change the borders of the regional natural reserve “Dniester Water Meadows”^{iv}, the core area of the Lower Dniester National Park.

Despite the fact that Ukrenergo's name does not appear in the documents, it cannot be a coincidence that the territory withdrawn from the nature reserve forms a corridor where the initial route of Novoodeskaya-Artsyz that was declined by the EBRD fits perfectly (please see the picture).



The decision was based on a 'scientific justification'; apart from containing a number of inaccuracies (in numbers, names of objects, etc), the document's main rationale for withdrawing the natural reserve status is the already existing infrastructure (a road and an old transmission line) and the future harm from the planned transmission line.^v

We call on the EBRD not to support the Novoodeska-Artsyz transmission line in any form that foresees crossing of the Northern part of the Dniester Lyman along the road M-15 Odesa-Reni regardless of the status of the territory. An artificial change of the borders of natural reserve does not change the fact that this is a valuable and highly sensitive area that stays under protection of the Ramsar Convention.

We call on you to support the principle of fair play and not to close your eyes to Ukrenergo's attempts to undermine Ukraine's fragile environmental legislation.

Yaroslav Movchan,

Head of National Ecological Center of Ukraine

This letter is endorsed by (company name, representative's name and title):

1. Odesa Department of National Ecological Centre of Ukraine, Stanislav Tybatin, Member of Board.
2. International Environmental Association of River Keepers Eco-Tiras, Ivan Rusev, Member of Board.
3. International Environmental Association of River Keepers Eco-Tiras, Ihor Schegolev, expert.
4. Environment-People-Law, Olena Kravchenko, Executive Director.
5. All-Ukrainian Environmental League, Tetyana Tymochko, President.
6. Azov-Black Sea Ornithological Union, Anatoliy Korzyukov, President.
7. Environmental organization "Delta" (Mayaki town, Odessa region) Zhukov A.
8. Odessa Social-Environmental Union, Alla Shevchuk, Head.
9. "EcoClub" (Rivne), Andriy Martynyuk, Chairman of the Board.
10. All-Ukrainian Children's Union "Environmental Guard", Olena Pashchenko, Head of Council
11. Youth Department of National Ecological Centre of Ukraine, Zavorotna G.V., activist.
12. Environmental group "Pechenyg", Sergiy Shaparenko, Head of the Council.
13. Ukrainian Society for Birds Protection, Oleg Dudkin, Executive Director.
14. Odesa Department of Ukrainian Society for Birds Protection, Sehiy Kurochkin, expert.
15. Foundation "Nature Heritage" (Odesa), Ruseva T.
16. Environmental club "Kray" (Berezhany), Galyna Protsiv, Head of Board.
17. Society of Ukrainian Language "Prosvita" of T. Shevchenko National University of Kyiv, Mykola Protsiv, Board Member.
18. Hiking club "Khodak" (Berezhany), Mykhaylo Podufaly, Deputy Head.
19. Environmental and touristic union "Orlan" (Dniprodzerzhinsk), Petro Chegorka, Head of the Council.
20. Environmental Cultural Center of V.M. Gontarenko, Yulia Ternova, Head.
21. Environmental Union "Our city" (Ternopil), Lyubomyra Kachmarska, Head.
22. Regional Department of All Ukrainian Environmental League (Berezhany), Ihor Gavrylyshin, Deputy Head.
23. Local Department of All Ukrainian Environmental League (Berezhany), Nadia Volynets, Head.
24. Institute of Ecology (INECO), Non-Governmental Scientific Organization, Volodymyr Maltsev, Expert.

ⁱ In order to preserve these unique lands and biodiversity, in 1993 the district council of Odessa issued order #496 –XXI dated November 1 to establish the Dniester Water Meadows nature reserve, and on 13.11.2008 the Ukrainian President signed order #1033 to establish the Nizhnednestrovskiy (Low Dniester) National Nature Park in the Dniester delta covering 21,311.1 hectares.

ⁱⁱ Law of Ukraine “On Ukraine’s participation in the Convention on Wetlands of International Importance mostly as waterbird habitat”, dated 29.10.1996 #437/96-BP.

ⁱⁱⁱ http://necu.org.ua/wp-content/uploads/UkrNGO_Dniester_delta_letter_to_EBRD.pdf

^{iv} Decision on change of the territory of natural reserve "Dniester Water Meadows" in Belgorod-Dniester district of Odesa region <http://goo.gl/KAphU>

^v State Environmental Academy of Postgraduate Education and Management, 24.11.2012, Scientific justification for changing of the margins of natural reserve “Dniester Water Meadows” at the territory of Belgorod-Dnistrovsky district, #113.005/03