

## Head of the EU Delegation to Ukraine

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### Statement

Of the Working Groups #3 “Environment, energy security and climate change” National platforms of Ukraine and the Republic of Belarus of the Civil society forum of the Eastern partnership  
(approved in September 2019)

### **To stop the ecologically and economically inexpedient project of the continental waterway E-40 Gdańsk - Kherson.**

The National Platforms of Ukraine and the Republic of Belarus of the Eastern Partnership Civil Society Forum consider it necessary to draw the attention of the governments of the Republic of Belarus and Ukraine, European partners and the public that activities related to the E-40 Gdansk-Kherson continental waterway project are carried out in violation of not only national legislation, but also international treaties of both countries.

In the absence of a developed E-40 project (there is only the feasibility study), international agreements are concluded both at the government level and at the regional level, as well as at the level of companies for the development of fragments of the E-40 river track infrastructure, as if the project was already approved by all interested parties and supported by the public. At the same time, the Ministry of Infrastructure and the Ministry of Natural Resources of Ukraine confirmed that the E-40 Project has not yet been developed.

A striking example of such decisions is the signing by the Minister of Infrastructure of Ukraine and the Minister of Transport and Communications of the Republic of Belarus, on December 5, 2017 of the Roadmap for Improving Navigation on the Pripyat and Dniro Rivers within the framework of the E40 international waterway project, which also provides for searching for potential users of the new route.

In 2017, a Memorandum of Cooperation was signed between the Kherson Regional State Administration, the Gomel Regional Executive Committee and the NIBULON Company to fulfill certain tasks of the E40 project.

In the framework of the First Forum of the Regions of the Republic of Belarus and Ukraine, on October 25-26, 2018, a round table was held in the town of Mozyr on the development of river navigation between the Republic of Belarus and Ukraine. Ukraine presented its project “Water Gate of Ukraine” as a fragment of the E-40 project. During this event, it was announced that the investor of JV NIBULON LLC began the implementation of the project. The Kherson State Administration on its website announces that the company JV NIBULON LLC is already starting prospecting in the protected areas between the villages of Aleksandrovka and Stanislav Belozersky district of the Kherson region for the construction of a new powerful port as part of the E-40 route. Meanwhile, the Ministry of Natural Resources of Ukraine confirmed that it did not provide LLC NIBULON JV with permission to carry out these works on the construction of a new port. It is worth remembering that the Dnieper estuary and the lands on its banks are included in the Emerald Network.

To implement the above roadmap, the Administration of the Seaports of Ukraine (AMPU) and the Belarusian company Beltopenergo signed a memorandum on the resumption of river

navigation between Ukraine and the Republic of Belarus in December 2018. An active search for funds to finance work is ongoing.

If implemented, the E-40 continental waterway project will have, as experts noted, devastating consequences for the ecosystems of the Republic of Belarus, Ukraine and the Republic of Poland. The project will cause not only a critical loss of biodiversity due to hydrological changes, such as an increase in water discharge, a deepening of the river bed and, possibly, a decrease in groundwater level, but will also be economically unsound. The project is based on an incomplete feasibility study that cannot prove the economic efficiency of the project and the general social benefits of its implementation. The implementation of the project will have a significant impact on protected areas, flora and fauna, valuable wetlands (including international and transboundary values), landscapes, forests and agricultural land. The E-40 continental waterway will affect the basins of the Vistula and Western Bug rivers in Poland, Pripjat and the Dnieper in Ukraine and all Polesie as a whole. These rivers are characterized by high biodiversity, unique ecosystems, which are key to the conservation of biodiversity in the Republic of Belarus and Ukraine and which are threatened by the construction of the E-40 navigation route. According to estimates compiled by Save Polesia - a project initiated by five civil society organizations from Belarus, Ukraine, Poland and Germany - the planned E-40 poses a threat to 4,558 sq km of Natura2000 Polish sites (more than 7%), 5,342 sq km of sites Belarusian Emerald Network (more than 25%) and 15 501 sq. km of sections of the Ukrainian Emerald Network (9%).

The construction and operation of the canal will lead to the loss of habitats and stopping places for migratory birds. Turovsky Meadow, located along Pripjat, is one of the most important places in Europe for migratory birds and is used as a stopping place for about 1.5 million spring migrants, including the endangered swivel warbler. Dehydration of wetlands is dangerous and can cause, among other things, fires. The annual smog in Kiev due to the fires surrounding drained peatlands is a convincing example of the threat posed by dried peatlands.

The E-40 project of the Gdansk-Kherson waterway also poses a threat of secondary radioactive pollution of the environment and human health as a result of activities in areas contaminated with radioactive isotopes after the 1986 accident at the Chernobyl nuclear power plant. Pripjat in Ukraine runs through the Chernobyl nuclear power plant exclusion zone, and during construction works radionuclide removal is possible: dredging works in the Kyiv reservoir can disturb sludge contaminated with the radioactive isotope cesium-137 and others, which will lead to pollution of the drinking water supply system for the capital of Ukraine and others cities downstream.

Moreover, the feasibility study of the project does not take into account the losses that third parties will incur against their will due to the implementation of the project. The project does not provide for possible compensation payments, and the main advantage is the reduction in the cost of cargo delivery. This cost reduction will benefit carriers, who are usually private companies, giving taxpayers the burden of financing the project, and citizens - to eliminate the consequences of environmental damage associated with loss of biodiversity. The feasibility study also does not take into account climate change and the growing frequency of weather anomalies, which can make the navigation of rivers more and more unstable, which makes new waterways, such as E40, unjustified and uneconomical. The analysis carried out by the Business Union of Entrepreneurs and Employers (BUEE) in Belarus of the feasibility study for the E40 project indicates a large project threats: significant capital expenditures, high investment risks, negative environmental consequences, which raise doubts about the viability of the E40.

Considering the above, the Working Groups of the 3 National Platforms of Ukraine and the Republic of Belarus of the Eastern Partnership Civil Society Forum consider it necessary:

1. Revise the feasibility study of the E-40 waterway project; The project should not be implemented without a comprehensive assessment of the impact of the E40 project on all countries. The concept of socio-economic well-being should be the basis of feasibility studies, which should include all costs associated with the project.

2. Conduct a strategic environmental assessment (SEA) of the project, taking into account its short-term and long-term environmental impacts;
3. Involvement of all interested parties in discussions of the E40 Gdansk - Kherson continental waterway project, including the general public at the national level in each partner country, as well as at the international level;
4. Conduct a study of the potential impact on the quality of drinking water supply systems in Kiev and other cities of Ukraine;
5. Consideration of alternative solutions for cargo transportation, including rail and road;
6. Preservation of Polesie in its natural state for future generations as a natural heritage of global significance;
7. Use the EP transport panel as a platform for international discussions on the E-40 waterway project.