



23.12.2019

м. Київ

Statement of the National Ecological Center of Ukraine concerning a gross violation of environmental legislation by “Ukrainian Sea Ports Authority” during the tender for dredging operations on the Pripyat River

On December 16, 2019, Dredging Fleet Branch of State Enterprise “Ukrainian Sea Port Authority” completed a tender for dredging operations of the Pripyat River with an expected value of UAH 10 million. The winner of the auction was limited liability company "Sobi".

Official title of the work: “Services for the current repair of the navigable river inland waterway of the public use on the Ukrainian site of the river Prypiat”.

In accordance with the general technical requirements for the execution of works, the section of the Pripyat River in the territory of Ukraine, which requires operational repair drawdown has a total length of 18.0 km. Guaranteed dimensions of the ship on this section: depth - 160 cm; width - 35 m; radius of rounding - 300 m. The layer of sediments, approximately from 20 to 90 centimeters, will be removed.

To maintain the guaranteed dimensions of the waterways on the Pripyat River from the border with the Republic of Belarus km 64,5 to km 46,5 it is necessary to carry out the repair for a total of 100 thousand m^{3.1}

The general technical requirements of the tender do not include the requirements for carrying out the environmental impact assessment, as the planned activity is defined as "operational repair drawdown" and does not take into account the potential threat of the spread of radiation contamination from disturbed bottom deposits and carrying out such works on the territory of the *Chernobyl Radiation and Ecological Biosphere Reserve*.

The dredging works as preparatory activities for the construction of the international waterway E40 are called “operational repair drawdown”, without observing the requirements of environmental legislation of Ukraine, the European Union and a number of international conventions to which Ukraine is a contracting party, are inadmissible.

Dredging operations in the specified area of the Pripyat River cannot be classified as “maintenance repair drawings” because no one has performed regular navigation through the Pripyat River for 33 years after the Chornobyl disaster. According to sub-paragraph 10, paragraph 3, Article 3 of the Law of Ukraine "On Environmental Impact Assessment" works: " the construction of deep-water vessels, including in natural river beds, special canals on land and in shallow marine areas suitable for passage of ships, as well as canals for flood purposes and hydraulic structures” shall be subject to environmental impact assessment.

We believe that this tender that has been declared with a flagrant violation of environmental laws, both national and European, should be canceled, and further planning should be carried out if there is an appropriate project for dredging and making the requirements for mandatory environmental impact assessment.

One of the most important studies for such an assessment should be to study the radionuclide content of the Prypiat River sediments, as well as the impact of dredging waste shoreline on the quality of water in the Prypiat River, radionuclide migration, and hydrologic regime change.

We would like to remind that the Pripyat River is a transboundary watercourse and dredging works, the directions should ensure compliance with the provisions of the Convention on the Protection and Use of Transboundary Watercourses and International Lakes.

We also would like to remind that in accordance with the requirements of the current Ukrainian legislation, European directives and provisions of the Aarhus Convention, to which Ukraine is a Contracting Party, the works and projects of such planned activity are subject to mandatory public discussion.

¹ <https://prozorro.gov.ua/tender/UA-2019-10-25-000325-b>

We believe that any dredging works on the Prypiat River should be agreed with the Prypiat Basin Council and discussed with the public in the discussion of the environmental impact assessment of the planned works!

Ukraine is a Contracting Party to the Berne Convention, which protects the wildlife and its inhabitants, and the wellhead area of the Ukrainian Prypiat belongs to the Emerald Network (Chernobyl Radiation and Ecological Biosphere Reserve, UA0000046).

The deepening of the river will change the hydrology of the area, in particular the river beds and floodplains. And this area contains important populations of 66 species and contains 25 special habitats for living creatures. Dredging in such areas is unacceptable!

It should be noted separately that the operation of the E40 Water Way will require a considerable amount of additional surface water. According to preliminary estimates, the water demand of the Dnipro-Bug Canal will increase several times. At the same time, Ukraine will not be able to provide any additional cubic meter of water to the volume already supplied through the Viziv water intake. On the contrary, the supply of water through this water intake should be reduced to a minimum and increase the flow of water into the main channel of the Prypiat River, since its upper channel is already overgrown with neritic plants and degraded.

In view of the aforementioned and major threats posed by the E40 project to the environment, we call on the Government of Ukraine to provide a comprehensive environmental impact assessment of the E40 Water Way project and wide public discussion at national level.

We would like to emphasize that the division of the E40 International Water Way project into individual fragments is inadmissible.

The European Commission has not included the E40 project in the EU's priority infrastructure projects precisely because of the high environmental threats of the project, so the implementation of the dredging of the river Prypiat is a waste of public funds.

The National Ecological Center of Ukraine considers water resources, first of all, as a natural resource, without which life on Earth is impossible.

In the face of global climate change, the conservation of fresh water in its natural state and protecting it from pollution is a direct responsibility of the Government of Ukraine.