



NATIONAL ECOLOGICAL CENTER OF UKRAINE

P.O. box 306, Kyiv, 01032
info@necu.org.ua | www.necu.org.ua



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To:

Mr. Matti Maasikas
EU Ambassador, Head of the EU
Delegation to Ukraine
delegation-ukraine@eeas.europa.eu

*Environmental and social risks
of the project of Tashlyk HPSPP (Ukraine, Mykolaiv region)*

Dear Mr. Matti Maasikas,

First of all, let me to express my respect and gratitude for the steady and comprehensive support of Ukraine by the European Union in this difficult and yet decisive time for our country. We are extremely grateful that, despite the Russian military aggression in Ukraine and the constant threat of missile attacks, the EU delegation has returned to Kyiv and is playing an extremely important role in strengthening cooperation and interaction between the EU and Ukraine in this critically important period.

With this letter, we would like to draw your attention to the project of the Tashlyk Hydro Pumped Storage Power Plant (HPSPP), which, due to its environmental and social risks (please see the Annex), has long been become the most resonant environmental project after the Chernobyl disaster. For more than 30 years, the civil society of Ukraine has been opposing the implementation of this old-fashioned Soviet project, which has been gradually destroying a unique historical and natural place protected at both the national and international levels - Buzky Gard.

Only last year, the project to complete the Tashlyk HPSPP received a negative environmental impact assessment decision, and now, in the midst of the war, the National Nuclear Power Generating Company "Energoatom" is starting an environmental impact assessment again, apparently counting on the fact that the public's attention is focused on the war and the confrontation with Russia, and not on the project .

At the same time, we note that the implementation of such an economically dubious and financially expensive Project is impossible without European investments. That is why in 2020 the project was submitted for EIB financing to attract a loan of 176 million euros. The bank's website indicates that the project is still at the evaluation stage, although the Ukrainian public has repeatedly warned the EIB about all the risks associated with its implementation.

We ask you to take into account the position of the public regarding the Tashlyk HPSPP project, as well to assist Ukraine to avoid violating its international obligations under the Aarhus Convention regarding public participation in the decision-making process on the protection of the environment as well as cultural and natural heritage, and to prevent the possible financing by European banks of the implementation of the lifting the level of the Oleksandriv reservoir and the completion of the Tashlyk HPSPP.

We believe that the abandonment of Russian fossil energy resources and the green transition of both Ukraine and the EU can and should take place without harming the environment, as well as the cultural heritage of Ukraine and European civilization in general. Renewable energy sources, such as the sun and

wind, in combination with the latest technologies for energy storage and power management should replace dangerous hydropower projects, which in Ukraine's conditions are killing our rivers.

The appendix describes in more detail the dangers of the Tashlyk HPSPP extension project.

Yours sincerely,

Head of NECU

A handwritten signature in blue ink, appearing to read 'Ruslan Havryliuk', written in a cursive style.

Dr. Ruslan Havryliuk

Tashlyk Hydro Pumped Storage Power Plant

Tashlyk Hydro Pumped Storage Power Plant (Tashlyk HPSPP) is part of the South-Ukraine electric power-producing complex (EPPC), construction of which began in 1975. Initially, it was planned to build 4 reactors of the South Ukraine Nuclear Power Plant (NPP), Tashlyk HPSPP with a capacity of 1800 MW and three reservoirs. By the mid-1980s, two NPP reactors had been built and the construction of the Tashlyk HPSPP had begun. Given that the project involved the flooding of very valuable natural and historical areas, 200 thousand inhabitants of the Mykolaiv region put the signatures under the requirement to carry out environmental assessment of this project.

According to the results of the environmental assessment, the project was significantly reduced, in particular, instead of 10 Tashlyk HPSPP's units that were planned to build, only 3 were built. Protected areas have been created on the lands that were supposed to be flooded: During 1994-1999 the Regional Landscape Park "Granitno-Stepove Pobuzhzhya" (6266 ha) was created, in 2009 – National Nature Park Buzkyi Gard (6138 ha), in 2016 – eponymous site of Emerald Network - UA0000040 (6148 ha). Also, in 2006, an object of cultural heritage of the national level was created – the culture memory territory Historical landscape of the Center of Bugo-Gardivska Palanka of Zaporizhzhya Army (1305 ha).

Subsequently, the Tashlyk HPSPP project began to be renewed step by step. In 2006, the Mykolaiv regional power withdrew a part of very valuable lands from the area of the Regional Landscape Park "Granitno-Stepove Pobuzhzhya" and they were flooded because of raising the level of the Oleksandrivka reservoir to the FRL (full reservoir level) + 14.7 m compared to the natural level of the river. Despite the fact that the Supreme Administrative Court of Ukraine declared illegal and annulled the resolution of the Cabinet of Ministers of Ukraine of June 20, 2006 No. 841 "On providing land plots for permanent use"¹, valuable historical and natural lands still remain flooded. Moreover, in 2011 the level of the Oleksandrivka reservoir was raised to FRL + 16.0 m, and the current intentions to complete Tashlyk HPSPP's construction provide for an increase in the level to FRL +20.7 m.

In order to prevent the project in 2017, local communities collected 8,000 signatures against the project realization. However, construction is still underway at local facilities of the South Ukraine energy complex. In particular, the construction of the Tashlyk HPSPP is underway, the dam of the NPP divided cooling reservoir to increase the upper Tashlyk HPSPP's reservoir (the volume of the NPP cooling reservoir is reduced), construction of spray cooling ponds for cooling of NPP reactors, construction of pumping station for operation of spray cooling ponds. It is obvious that after the completion of the construction of all these facilities, the civil society of Ukraine will be faced with the need to raise the level of the Oleksandrivka reservoir to the FRL +20.7 m, which will mean the loss of particularly valuable nature reserves and cultural heritage, and will lead to further degradation of one of the largest rivers in Ukraine - Pivdennyi Buh (Southern Bug). Irreversible water losses under such a project increase sharply, which may exacerbate water shortages in the region.

The intentions of the European Investment Bank to provide a loan for the completion of Tashlyk HPSPP

European Investment Bank intends to allocate 176 million euros to complete construction of Tashlyk HPSPP with a capacity of 906 MW².

¹ https://ips.ligazakon.net/document/view/KP060841?ed=2006_06_20

² <https://www.eib.org/en/projects/pipelines/all/20180619>

Legislative aspects of Tashlyk HPSPP's completion

The project to complete the construction of Tashlyk HPSPP has not yet passed the procedure of national environmental impact assessment, and the commencement of this procedure³ in 2018 caused a wave of public protests. The publicly available register of EIA objections includes protests from the National Ecological Centre of Ukraine, the Cossack community of the shipping district, the Headquarters of flood resistance of the Bug Guard, Voznesensk ecological association "Green world", and also from the Mykolaiv mayor, 8000 citizens of Ukraine, as well as well-known Ukrainian scientists. The answers have not yet been received.

The project of completion of Tashlyk HPSPP as a part of hydraulic units 3-6 contains a number of technological solutions which will lead to significant environmental, social and cultural negative impacts. Completion of Tashlyk HPSPP will violate international and national legislation: Bern Convention, Water Code of Ukraine, Laws of Ukraine: "On Environmental Protection", "On Flora", "On Fauna", "On the Red Book of Ukraine", "On the Ecological Network of Ukraine", "On Protection of Cultural Heritage".

Bern Convention

The area to be flooded is part of the Emerald Network - Bugzkyi Gard National Nature Park - UA0000040. In March 2020, a number of Ukrainian scientists appealed to the Bern Convention Standing Committee with a complaint about the destruction (in the case of the completion of Tashlyk HPSPP) of very important habitats of the Emerald Network of Europe, significant damage to populations of the six species of flora and fauna included in the Resolution of the Bern Convention.

Problems of water supply and environmental quality of local communities

Raising the level of the Oleksandrivka reservoir by 20.7 m will increase in the regulation of the Southern Bug (Pivdennyi Bug) river by another 51 million m³. It should be noted that today the total volume of reservoirs of the Southern Bug has already exceeded the norms established by the Water Code of Ukraine. Irreversible evaporation water losses will increase by 1.5 million m³ of water per year, and surface water use by the South Ukraine Nuclear Power Plant will increase by additional 7 million m³ of water per year. This will happen now when the flow of the Southern Bug river, due to climate change, has been catastrophically decreasing.

The South-Ukraine electric power-producing complex, which includes the South Ukraine NPP, Tashlyk HPSPP and Oleksandrivka HPP, is the largest user of surface water - the only reliable source of water supply in the entire region. The expansion of the energy complex and intensifying of impacts such as defragmentation of river basin, decline of the current, will lead to a deepening of the water-ecological crisis.

In addition, the completion of the Tashlyk HPSPP, includes the construction of five cooling ponds to cool the reactors of South Ukraine NPP, each of which will consume 67.5 m³ of water per second, which is a critical resource for the region. The project envisages the reconstruction of the dam separating the cooling reservoir of the South Ukraine NPP from the upper reservoir of the Tashlyk HPSPP and the discharge of 10.59 million m³ of water from the cooling reservoir is threatening the entire ecosystem of the Southern Bug (Pivdennyi Bug) river.

Historic landscape under threat of flooding

The "Historical Landscape of the Center of the Bug-Guard Palanka of the Zaporozhian Army", which is a cultural heritage site of national importance (security number 140001 - H). This is the last authentic nature landscape connected with the history of the Zaporizhian Sich, which is significant both for Ukrainian and for European culture in general. In the case of an increase in the level of the Oleksandrivka reservoir to the FLR +20.7 m, a key part of it is flooded – Gardovy Ostriv (Guard Island).

³ <http://eia.menr.gov.ua/uk/case/id-564>

It is strange for the civil society of Ukraine to resume the next project of completion of Tashlyk HPSPP with raising the level of Oleksandrivka reservoir by 20.7 m. The inexpediency and impossibility of the project in recent decades has been substantiated a number of times by the public and scientists, confirmed by court decisions, as well as repeatedly expressed by the Ministry of Ecology and Natural Resources.

We hope that the European community will not take part in the completion of the Tashlyk HPSPP, which violates European environmental values and poses additional threats to the territorial integrity of Ukraine.

You can find more about actions against the Tashlyk HPSPP on national TV channels below the links:

ICTV: <https://youtu.be/HQooS1Aun7E?t=57>

Inter: https://youtu.be/_1kcU-bZDbc?t=646 (from 9.18 to 12.06 min)

On the Mykolaiv regional TV channel:

<https://www.facebook.com/trknis.tv/videos/257404288586478/?t=908>

Articles in the newspaper “Uriadovyi Kurier”(Governmental Courier) :

Save the river Buh. The Mykolaiv activists continue fight against raising the level of the Oleksandrivka reservoir and flooding of unique areas <https://ukurier.gov.ua/uk/articles/uryatuvati-richku-bog/>

The Mykolaiv activists oppose completion of the Tashlyk HPSPP

<https://ukurier.gov.ua/uk/news/mikolayivski-aktivisti-vistupayut-proti-dobudovi-t/>

Article on the Mykolaiv regional information portal:

Battle for water: what threatens to raise the level of the Oleksandrivka reservoir by 20.7 m?

<https://nikvesti.com/articles/188236>



The photo of action against the completion of Tashlyk HPSPP's construction, March 14, 2020