

Letter: Urgent call to ask for an extension of the scrutiny period for delegated act C/2024/5129 final in order to allow proper assessment of cross-border renewable energy projects

To:
Coordinators of the ITRE Committee of the European Parliament
Members of the ITRE Committee, Greens/EFA and S&D political groups

Brussels, 12 September 2024

Dear Member of the European Parliament,

We, the undersigned environmental organizations, are writing to you with the request to **urgently address a high threat imposed by a new transboundary hydropower project on the Lower Danube**, listed by the European Commission on 24 July as a **Renewable Energy Cross-border Project (CB RES list)** under the **Connecting Europe Facility for Energy (CEF Energy)** and therefore made eligible for EU funding. This so-called “TMNHSA (BG-RO) Project - The Turnu Magurele-Nikopol Hydraulic Structures Assembly”, located downstream of the Romanian town of Turnu-Magurele and the Bulgarian town of Nikopol, on the (still) undammed 836 rkm long Lower Danube, would create considerable risks of landslides and threaten critical infrastructure, settlements and arable land. Its economic viability is questionable given the rising costs of hydropower and the increasing frequency of low water levels of the Danube.

This project was submitted by the European Commission for the European Parliament and Council’s scrutiny through a delegated act¹ according to the EU CEF Regulation 2021/1153, at the end of July although the European Parliament was not yet in full working order. This is disrespectful of the European Parliament’s democratic control, and **we therefore ask you to request an extension of the scrutiny period** by two months to allow for sufficient reflection, analysis and discussions with all concerned parties – governments, scientists, environmental NGOs, civil society organisations, intergovernmental networks working on the Danube region, and other relevant bodies and sectors.

Economic viability is questionable. As the run-of-the-river technology used for his project is weather-dependent, the planned facility will not be able to balance the intermittent production of wind and solar. The availability of water resources in Romania is approximately half of the EU average and is very close to the water stress threshold. This is why the operating profit of Hidroelectrica (Romania’s largest hydropower company) dropped by 34% in 2023-

¹ Delegated regulation C/2024/5129 final, available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=pi_com%3AC%282024%295129

2024. The project also implies hundreds of km of new dikes that need to be maintained, as well as dozens of energy intensive water pumping stations, keeping operating costs high.

The project would not only seriously jeopardize the ecological integrity and ecosystem services of the Lower Danube, but also pose risks to people and economic sectors. Among the anticipated negative impacts are the following:

- The Bulgarian bank of the Danube River will be **destabilized, landslides** activated.
- As a high groundwater head would be maintained all year round, soils will salinise with **severe implications for agriculture.**
- Over **100 cities and villages are likely to be impacted** involving e.g. flooding of **ports and houses** in the 280 km inundation area, degradation of agricultural land and fisheries, lowered climate resilience;
- Alterations in the river flow regime and sediment transport will directly affect the status of hundreds of **Natura 2000 sites and several UNESCO and RAMSAR sites** along the Lower Danube and in the Danube Delta; **55 Danube islands will be submerged / destroyed; migratory fish**, especially shad and highly threatened sturgeon species protected under EU law will lose access to their last known spawning grounds;
- Commercial **fisheries** will be seriously impacted;
- **Past and planned restoration projects**, aiming at mitigating the impact of climate change and biodiversity deterioration will be **made obsolete**, thus **wasting huge sums of EU money.**

The project is thus clearly in contraction to EU policies, laws (Water Framework Directive, Habitats Directive) and international commitments.

If the official CB RES status of the Project will not be challenged by the European Parliament and the Council, the proposed project will be eligible for financial support for studies and works under the CEF Energy Programme. It will also benefit from higher visibility, increased investor certainty, and stronger support from Member States. **As this project is in conflict with the EU's water management and sustainable development policies, it should not benefit from such privileges.**

Thus, we strongly believe that the above-mentioned project should be excluded from the CB RES list and call on you to take the necessary steps. Instead, efforts should focus on ramping up investment in sustainable alternatives for hydropower generation, in particular wind and solar, for which potential is high.

Please find a **Briefing Paper** attached with more detailed information.

We remain open for a transparent dialogue with you (including a meeting in person), in the spirit of the European Union's principles and values, and we count on your continuous commitment to secure a safe and resilient Europe for our future generations!

Thank you in advance for considering our views and call to action.

Sincerely,





Levegő Munkacsoport



INTERNATIONAL MIRE
CONSERVATION GROUP



Agrolink Association - Svetla Nikolova, Chairperson (Bulgaria)

Asociatia Ecolegal - Cătălina Rădulescu, President (Romania)

Asociatia Declic - Roxana Pencea-Brădăţan, President (Romania)

Association of Parks in Bulgaria - Simeon Arangelov, Chairman of the Management Board (Bulgaria)

Balkanka Association Sofia - Ivan Pandukov, Chairman (Bulgaria)

Balkani Wildlife Society - Petko Tzvetkov, Chairman (Bulgaria)

Bankwatch Romania Association – Ioana Ciută, President (Romania)

Buglife - The Invertebrate Conservation Trust - Craig Macadam, Conservation Director (UK)

Clean Air Action Group - András Lukács, President (Hungary)

CEE Bankwatch Network - Mark Martin, Executive Director (Central and Eastern Europe)

CEEweb for Biodiversity – Csaba Mezei, General Secretary (Europe)

Danube Sturgeon Task Force – Peter Gammeltoft, Chairman (Europe)

EcoAlbania - Olsi Nika, Executive Director (Albania)

Ecological Movement „Ibar“ Kraljevo (ECOIBAR) - Miroslav Pavlovic, Director (Serbia)

Environmental Association Za Zemiata/Friends of the Earth Bulgaria - Iva Dimitrova, Board Member (Bulgaria)

European Environmental Bureau – EEB - Patrick ten Brink, Secretary General (Europe)

European Anglers Alliance - Mark Owen, Director (Europe)

European Rivers Network - Roberto Epple, President (Europe)

EuroNatur - Gabriel Schwaderer, Executive Director (Europe)

Federatia Coalitia Natura 2000 (18 Members) - George Kudor, Director (Romania)

Foundation Atelier for Community Transformation – ACT - Lejla Kusturica, Director (Bosnia & Herzegovina)

Friends of the Earth Europe - Jagoda Munić, Director (Europe)

Grupo de Estudos de Ordenamento do Território e Ambiente – GEOTA - Helder Careto, Executive Secretary (Portugal)

Greenpeace CEE - Marina Barbalata, Programme Director; Magda Stoczkiewicz, Greenpeace EU Unit Program Director (Central and Eastern Europe)

Genç Düşünce Enstitüsü - Muratcan Işıldak, Head of Institute (Turkey)

International Mire Conservation Group – Prof. dr. Rudy van Diggelen on behalf of Dr Rob Stoneman, Chair of IMCG (Global)

Perangua Association - Maite Vroom, Secretary (Spain)

Pro Natura – Friends of the Earth Switzerland - Friedrich Wulf, Head, International Biodiversity Policy (Switzerland)

Recourse - Duncan Pruett, Executive Director (Global)

Rivers without Boundaries Public Fund - Alexander Kolotov, Director (Global)

RiverWatch - Ulrich Eichelmann, CEO (Austria - Balkans)

Societas Europaea Herpetologica – SHE - Andreas Maletzky, President (European)

Sturgeon Specialist Group (IUCN) - Arne Ludwig, Chair (Global)

Stichting Reptile Amphibian Conservation Europe - Dr Ronald Zollinger, Chair (The Netherlands)

Wetlands International Europe - Chris Baker, Director (Europe)

World Sturgeon Conservation Society – WSCS - Paolo Bronzi, President (Global)

Women Engage for a Common Future - Sascha Gabizon, Executive Director WECF International (Global)

WWF European Policy Office - Ester Asin, Director (Europe)

WWF Central and Eastern Europe - Andreas Beckmann, CEO (Central and Eastern Europe)