

WWF POSITION PAPER

ON HYDROPOWER DEVELOPMENT IN UKRAINE

WWF believes that development of renewable energy sources in Ukraine is crucial for complying with the Paris Agreement. At the same time, the development of renewable energy sector in Ukraine should be done in a holistic way, be strategical and should aim at minimizing additional anthropogenic pressure on ecosystems.

This is particularly relevant for hydropower, which is a renewable energy source with at times dramatic negative impact on aquatic ecosystems and their services at local and river basin levels. Unfortunately, environmental mitigation and compensation measures, which are obligatory within the framework of hydropower projects, are not able to fully eliminate the loss of biodiversity and are often only half-heartedly applied.

Currently there is no clear and balanced governmental policy concerning development of hydropower (on large and small scales) in Ukraine. Instead, there is a range of legislative acts that regulates hydropower development in the country, which are not attuned to each other. Moreover, some of the documents require deep preliminary environmental and hydrological studies.

WWF in Ukraine states that development of hydropower as an industry with high environmental risks should be regulated by governmental policy which ensures transparent and balanced planning procedures and compatibility with international and national environmental legislation. The following principles should be applied:

- **1.** Before planning of the increase in hydropower production in Ukraine:
 - long-term goals and the priorities of the energy sector development should be carefully studied and analyzed and decided;
 - alternative scenarios should be evaluated, paying special attention to achieving climate and energy goals throughenergy efficiency and energy saving measures;
 - construction of new hydropower plants is justified only in case if increases of energy production are really needed and no environmental friendly option exists.
- 2. 2. Number of free-flowing rivers in natural state in Ukraine is decreasing day by day. That is why natural flow rivers should be conserved and protected from anthropogenic pressure. Areas of high conservation value should be defined, declared «no-go areas» and legally protected. Hydropower plants in these areas should be banned.

Free-flowing rivers in natural state are the freshwater equivalent of wilderness areas. The natural flow variations of these rivers shape and form diverse riverine habitats, within and next to the river. In many places, connected, free-flowing rivers are crucial for carrying sediment downstream, bringing nutrients to floodplain soils, maintaining floodplains and deltas that protect against extreme weather events, and providing recreational opportunities or spiritual fulfilment. Almost everywhere that free-flowing rivers remain, they are home to vulnerable freshwater biodiversity. Dams and other infrastructure threaten these free-flowing rivers as they create barriers, causing fragmentation and alteration to flow regimes. Dams also affect long distance migratory fishes by obstructing their migratory pathways, making it difficult or impossible to complete their life cycles.

- **3.** All of the hydropower development strategic documents should
 - a. be revised and rewritten in a coherent manner,
 - b. undergo strategic environmental assessment, including stakeholders involvement and genuine public participation,
 - c. be approved through clear transparent processes.
- 4. Each hydropower project should be subject of environmental impact assessment. Decision to start construction activities should be made only after positive EIA results.
- 5. Environmental mitigation and compensation measures (such as fish passes and habitat restoration etc) should be developed and implemented within the framework of hydropower projects on mandatory basis.

The Program of hydropower development for the period till 2026 was approved by Ukrainian government in July 13, 2016. Ministry of Ecology and Natural Resources of Ukraine did not agree with the majority of the projects considering in the Program (letter of Ministry of Ecology and Natural Resources of UkraineNº 03/15-6390 dated June 16, 2016):

- completion of Dniester Pumped Storage Power Station (PSPS)and construction of Kaniv PSPS–EIA was not conducted
- completion of Tashlyk PSPS–significant negative impact on the national park "Buzkiy Gard"
- construction of Verhnodnistrovskiy cascade HPPs-significant negative impact on national park "Dniester Canyon", national park "Hotynskij", national park "Halitskij".
- **6**. Perspectives of developmentofsmallhydropowersectorshouldbe critically analyzed. Currently,thereisnoclearvision, strategyorplanforsmallhydropower sectordevelopmentinUkraine. Process of small hydropower plans development should be comprehensive, transparent, open for all stakeholders' contribution and should involve environmental impacts analysis.

Large-scale uncontrolled construction of small hydro power stations is associated with high environmental risks, especially when cumulative impact on environment and tourism sector was not considered. It could lead to the unpredictable ecological consequences and increasing social tensions in the regions.

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- 7. Each small hydropower project should be implemented in accordance with the national environmental and urban planning legislation. Process of involvement of commercial organizations into the small hydropower projects should be transparent, should involve public participation and should be done on the tender basis. Any pressure on local communities should be banned!
- 8. The conditions for granting "green tariff" support to small hydropower plants should be revised due to their high anthropological impact on the environment.

Analysis of the majority small hydropower projects in Ukrainian Carpathian region shows that environmental damage created by construction and maintaining of hydropower plants is higher than economic benefits. Small hydropower projects are economically feasible for owners and investors only if "green tariff" is applied.

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