

# Position Paper

## The Threats to nature conservation values in Shushica River: Water Supply Project of Himara Municipality

Prepared by EuroNatur and Riverwatch, 08 November 2023

### 1. Background Information

Although Albania is rich in water resources, the urban areas, especially the bigger cities suffer from poor infrastructure of the water supply systems. There are very few towns that have a 24/7 drinkable water supply.

The objective of the Strategy for Water 2020-2030 is to supply 90% of the territory with drinkable water 24/7. In the last 30 years several programs and projects have been prepared, but the problem largely remains due to multiple reasons.

The problem becomes particularly evident in the urban areas along the coastline during the summer months when the water resources are scarce, while the demand increases, especially due to the tourism boom. Thus, municipalities like Durrësi, Vlora, Himara or Saranda are facing significant challenges.

In this regard “Water 24/7” has been the latest initiative undertaken by the Albanian Government aiming to provide drinkable water to all 61 Municipalities at least in the urban areas in an uninterrupted service until 2025. The Program of the rehabilitation of the rural water supply systems comes also within the frame of the objective set in the Water Strategy 2020-2030.

### 2. Project Details

The Rural Water Supply IV program is applied in the municipalities of Himara and Orikum and for the development of tourism along the Albanian Riviera.

The project is supposed to supply over 80,000 residents and tourists with drinking water. According to the project developer ADF, this project will have a positive impact on the environment thanks to the construction of two small HPPs in Himara, contributing to the production of renewable energy and environmental protection.

The project consists of a 17.35 km pipeline with 500 mm diameter, that will divert the water from the headwaters of Shushica River towards Himara Municipality. In order to construct this pipeline, about 8.5 km new access roads have to be constructed.

**Timeline**

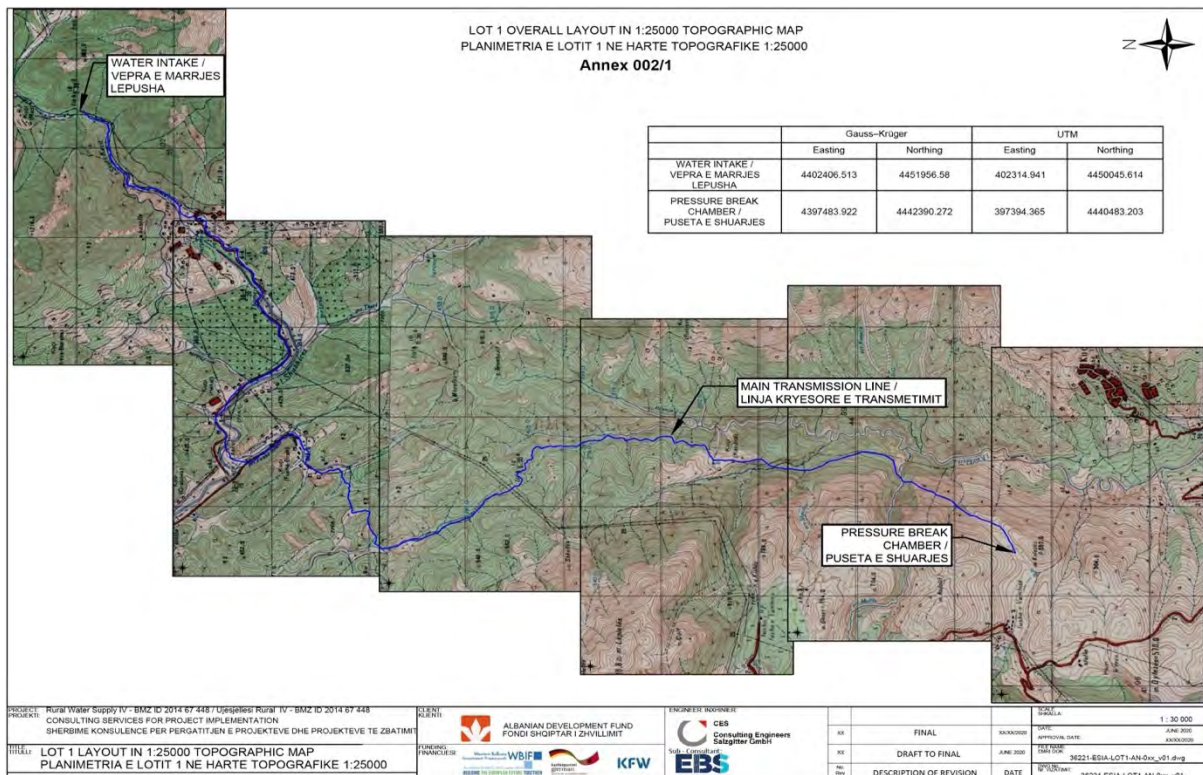
In 2019 the project started with the preparation of the feasibility study, followed by a series of closed consultation meetings. The first meeting took place in Tirana in the premises of NEA<sup>1</sup> on May 20<sup>th</sup>, 2020, with the EIA<sup>2</sup> experts of NEA, ADF<sup>3</sup> and CES Salzgitter GmbH Consultant.

During 2020, the EIA has been prepared and a “Stakeholder Engagement Plan” has been developed and the outcome of the EIA report has been consulted with the relevant stakeholders.

On May 5<sup>th</sup>, 2021 NEA issued the Environmental Permit based on the Preliminary EIA. This means that the project got a “green light” to continue with the development without a thorough EIA.

During 2022, all permits, including the Water Use Permit and Construction Permit have been issued. The construction has officially started on January 10<sup>th</sup>, 2023 and it is expected to last 18 months, so the project is expected to be finished in August 2024.

In early 2023 the construction has started and within the last 10 months it has advanced significantly. Construction is ongoing.



**Figure 1: The footprint of the Himara water Supply System © EIA Report of the Project**

<sup>1</sup> National Environment Agency  
<sup>2</sup> Environmental Impact Assessment  
<sup>3</sup> Albanian Development Fund

**Basic data**

- The project would directly impact the Vjosa Wild River National Park
- The water intake scheme and some other infrastructure is planned to be build inside the national park.
- The project is developed by CES Salzgitter GmbH Consultant
- It is financed by Albanian Government, KfW and WBIF
- The ADF is responsible for the project Implementation.
- The construction company is a joint venture of STRABAG AG and TREMA Engineering 2.
- Total Investment of the water supply is estimated around 9.5 Mio EUR while the entire program that includes the construction of the sewage water treatment is about 45 Mio. EUR.

**3. State of Affairs**

One of the 5 spots identified for the project as storage locations was built directly at the Shushica River in the spot known as Lasko Bridge between Kuç and Kallarar villages. A first check with coordinates showed that parts of the storage was built inside the national park.



**Figure 2:** Storage Location at Lasko Bridge at the Shushica, partly build inside the national park. © Google Earth 2023



Being fairly exposed by the river and by the main road, this station was the first source of information to local community of Shushica valley about the project. Prior to that, they had no information regarding the diversion of the water from Shushica.

The local community has never been informed or consulted about the project during the planning phase.

Around 30 villages are located in the Shushica valley. Half of them belong to Himara municipality, while the other half on the lower part of the river belongs to Selenica municipality.

It has to be emphasized that none of the citizens of these communities have ever been informed or consulted about this project.

Thus, it was only 5-6 months after the start of the construction, they realized that this project would divert the water from the Shushica main spring. In this context they raised their concerns in June-July 2023 by sending letters of concerns to Himara and Vlora municipalities as well as to their representative in the Parliament and other relevant authorities.

In early August 2023 the locals blocked the construction site of the intake, upstream of Kuç village, while a second protest took place in mid-August 2023 at Lasko Bridge where people temporarily blocked the main road.



**Figure 3:** Local community of Shushica river valley protesting against the diversion project, August 2023 © Riverwatch

Since the protests, the construction works at the intake have stopped, but they continue on the side of Himara and Kudhesi stream with the opening of the new access road and distribution of the pipeline.





**Figure 4:** The construction of the pipeline route in the middle of the oak forest © Riverwatch

Following the August protests, more than 2.000 people from the Shushica valley signed a petition to stop the diversion project in September 2023.



**Figure 5:** The pipes are already close to Kuc. Construction is ongoing © Riverwatch



The community expressed their opposition also during a consultation meeting for the preparation of the Vjosa Wild River National Park Management Plan in Vlora on September 9<sup>th</sup>, 2023.

In addition, the local communities and environmental groups are working towards initiating judicial proceedings in the Administrative Court to challenge this project legally as it is not in line with the environmental legislation as well as not in line with the public consultation legal framework.

However, until now the construction is ongoing on the side of Kudhesi stream, and it has stopped at the intake location since the last protest of the local community. Figure 7 shows the intake location where the intervention aside the Shushica headwaters has been dug a 5-6 meters deep channel that will serve as the intake well. This channel goes below the level of Shushica river, and it drains all the water to the right side, leaving the main river dry already for few hundred meters.



Figure 6: The construction of the intake scheme has been stopped due to protests. The intake is located inside the national park. © Riverwatch

#### 4. Main points of criticism

##### Environment

This project is a direct and significant interference in the recently proclaimed Vjosa Wild River National Park. The intake of the water is located inside the national park, diverting the water from the Shushica headwaters which would deteriorate the integrity of the national park, very likely along the whole valley. The planned diversion of 104 l/s from the Shushica springs, where the annual average waterflow is estimated to be 139 l/s, would abstract especially in summer all the water from the Shushica in the upper part.

The operation phase is expected to have a significant and irreversible impact on the Shushica waterflow and sediment regime and therefore on the ecological integrity of the Vjosa Wild River National Park. The diversion of 104 l/s, where the annual average waterflow is estimated to be 139 l/s, is expected to leave the riverbed dry during the entire summer.

Given the fact that Shushica River is flowing mostly on a karstic geological formation with its typical hydrology, any diversion of water will have a **significant impact in the longitudinal connectivity of the riverine ecosystem**. In this regard the diversion in the frame of the water supply system of Himara Municipality is expected to have a severe negative impact in the first 10-12 km of the river from the intake and downstream as well as in the last 10 km of the Shushica flow close to the confluence with Vjosa, from Peshkepia bridge and downstream.

Thus, the diversion project is likely to impact the functionality of the river and will reflect the negative impact in the aquatic and riparian flora and fauna of the river.

In addition, the construction and the operation are expected to have a severe negative impact on the areas landscape, which is part of the Protected Areas Network, namely the “Zerci Oak Forest, Nature Monument, category III”.

##### Public consultation

No public consultation has taken place in the affected area with the communities that live along the Shushica River valley (in all 30 villages). This means, that those people and communities who would face severe negative effects were not informed. This has caused an immediate and strong reaction of the local people in the villages from Kuç (far upstream) to Armen (downstream part of Shushica).

##### EIA Report

- Concludes that the project has no major negative issues as all the arguments covered within the report are supporting the construction of the project.
- Does not describe at all any potential threat or impact on the aquatic life along the Shushica.
- Contains a very poor mitigation measures plan. Almost no measure has been foreseen towards the negative impacts on the biodiversity especially on the aquatic and riparian flora and fauna.

- Is not referring at all to the fact that this river would potentially become part of the Vjosa Wild River National Park, a debate that has started already in 2019 when the Albanian Government (PM Edi Rama) made its first public announcement towards the establishment of the Vjosa National Park.
- Does not refer to the impact on the Zerci Oak Forest, Nature Monument, category III.
- Finally, in the Feasibility study as well as in the public announcement of the project, it is mentioned that integral part of the project is also the construction of 2 small hydro power plants (HPPs) close to Himara. However very limited information is provided in the EIA Report on these projects. It is unclear who will run this HPPs and what is their installed capacity.

## **5. Conclusions and Demands**

The decision to permit and fund this project was based on insufficient and false data, while the affected people in the Shushica valley were not consulted.

If this project would be finalized, it would not only deteriorate Europe's first Wild River National Park, it would also damage the trust of the local people in the par and it would damage the reputation of all involved organizations and persons.

This project can put the whole concept of the Wild River National park at risk.

Therefore, we demand to halt the project, to stop the construction work immediately. This would give time to:

- Prepare a proper EIA
- Consult with local communities
- Assess alternative water sources outside the national park with national and international experts .