Lack of public participation in decision-making processes and disatisfactory quality of environmental impact assessments led to numerous problems

In order that citizens have a clear overview of the current situation with Small Hydro Power Plants they should be informed that up to now almost 60 SHPP projects have been approved, both through tender procedures and through the energy permitting procedure for SHPs up to 1 MW of installed power. The total installed power of the approved SHPP is over 100 MW and the planned annual production is over 300 GWh. Taking into account the size of our country we can all agree this is a significant number of energy projects.

Numerous problems arised from the unsustainable planning of SHPPs but in recent months, they have emerged on the surface. We are witnessing protests and reaction of local people in whose villages or communities these energy projects are being constructed. On the first place the locals are complaining on unconcious concessionaires who are devastating their rivers, roads, leaving them without water for water supply and arrigation. Its we all know that in most cases these people are living from agriculture and water supply problems are a threat for their existence.

The key problem and omission made by the Ministry of Economy, as the competent authority for planning and awarding concessions is inadequate public information of local population mentioned before.

Public participation and consultations are conducted under legal minimum requrements, while efforts to implement different consultative methods and enable continuous inclusion and quality exchange of information, ideas and solutions are an exception rather than a rule.

At the planing stage of concession awarding it was neccesary to establish a participatory processes, including the participation and engagement of the local population which are likely to be most affected by the impact of construction.

Considering the fact that the construction of SHP inevitably leads to a certain disturbance of the landscape, ecological and memorial values, we consider that the local population should have a much more important role in the planning process as well as in deciding on the construction of small hydropower plants in order to be sustainable and usefull

both for the state and Concessionaires and on the other side for the local population of all municipalities in which the construction of small hydropower plants is planned.

NGO Green Home during public consultations demanded from the Ministry of Economy to involve local communities in the planing proces but its obviously that the decision makers didnâ€™t take it into account. Amo ng many others , this is certainly one of the biggest ommisions that has led to this current situation.
The construction of SHP also leads to changes or disruptions of the environment. This occurs as a result of the unconciounable work of concessionaires, poor Elaborates on impact assessment and equally poor implementation of measures to prevent and eliminate negative impacts as well as poor supervision by the competent inspection. Political commitment to protecting the environment is very high on "paper" while we have a different situation in practice.

The content quality of Elaborate on Environmental Impact Assessment is at an unsatisfactory level, while the procedures are being implemented more to satisfy the form rather then substantially analyze the problems and determine solutions which will guarantee the best outcomes for the environment. The main disadvantage of project assessments is the generalistaion of the baseline, presenting irrelevant data that are not focused on the project area. This is a consequence of poor existing databases, while the obligation to collect additional data to ensure a reliable assessment is not prescribed by law. This makes more difficult to assess the environmental impact and later on to define the measures to prevent, reduce or eliminate adverse impacts which in most cases are general, inappropriate or are not given enough attention.

Also, public participation in the project impact assessment in Montenegro is still far from the outcome of the EIA Directive. Public consultations are often characterized by misunderstanding and distrust, very distant attitudes and confrontations.

Furthermore, the capacities of professional companies in charge of preparation for Elaborate on Impact Assessment are insufficient and in the absence of adequate stimulating mechanisms for improvement of their work are prevailing pragmatic approaches and efforts to meet only the minimum requirements in the elaboration of the project with minimum engagement of the company's resources.

It is almost absurd that Strategic Impact Assessment does not apply to concession plans or concession acts for water and forest exploitation. The construction of small hydropower plants in Montenegro is ongoing, while the cumulative impacts of these projects on the environment have not been adequately assessed.

With large droughts and record low water leve we are witnessing the impact of climate change on our rivers. In the Elaborates the climate change impacts on the Montenegrin river's in most cases are not adequately analyzed, ie they are analyzed in a way to only respect the form, but not fundamentally, and anticipate possible solve the problems. It should be dedicaated particular attention to these issues, which are becoming more and more evident, and create a quality strategy with all the necessary measures for adaptation and mitigation. It is crucial that these problems must be considered in the development of the economy, as they will have a significant impact on the population and the business sector.