Save Polesia and Stop E40

Green-Blue future for connecting the Baltic and Black Seas

Position paper in relation to the suggested E40 inland waterway

2018

KEY FACTS

- The E40 inland waterway would impact 392,949.08 km2, which is inhabited by 28 690 834 people.
- Cost
- Threat to human health in Chernobyl
- Impacted size of protected areas
- Impacted habitat types / biodiversity
- Climate change & Ecosystem services
- E40 promises vs our vision
- Our demands

POLESIA

Polesia is a cross-border region located in Central and Eastern Europe. There are different criteria and approaches to define the boundaries of Polesia used by various disciplines.

In this document, Polesia is defined according to the physiographic zones and corresponds to the Polesia physiographic subprovince (code 845 in the European Decimal Classification), which therefore appears to be a southern part of the Baltic-Belarusian lowland. Thus, Polesia consists of (moving from the West clockwise) South Podlashie lowland, North Podlashie lowland, Subpodlashie, Dnieper, Central Russian Upland, Sumy, Poltava and Dnieper lowlands, along with Dnieper, Lublin, Volynian and Podolian Uplands.

The physiographic region of Polesia extends over a length more than 900 km from the West to the East and reaches over 300 km at its widest point. The total area covers more than 186 000 km^2. The largest parts are located in Ukraine (over 94 000 km^2) and Belarus (over 62 000 km^2). 7 000 km^2 of Polesia (Lublin and parts of the Volynian Polesia) are located in Poland. Bryansk-Zhizdrinsky Polesia is situated in the Russian Federation and occupies an area of around 23 000 km^2.

Within the framework of administrative-territorial divisions, Polesia belongs to four different states: Belarus (southern districts of Brest and Homiel Regions; separate parts of Minsk and Mogilev Regions), Poland (eastern counties of Lublin Voievodeship), the Russian Federation (west Bryansk, Oryol and Kaluga regions) and Ukraine (northern districts of Sumy, Rivne, Zhytomyr, Kyiv, Chernigiv and Volyn regions).

Map 1: The location of Polesia

THE E40 INLAND WATERWAY

The E40 inland waterway (E40 IWW) is a transnational initiative aimed at establishing an approximately 2,200 km long navigable connection[1] between the Baltic and the Black Sea. Based on the E40 IWW feasibility study (FS) written by a consortium led by the Maritime Institute of

[1] class IV inland waterway with the minimum dimensions of vessels 80 m * 9,5 m, depth of 2,5 m https://www.unece.org/fileadmin/DAM/trans/conventn/agn.pdf

Gdańsk[2], the construction works will impact the following European rivers: the Vistula, the Bug, the Pina, the Pripyat and the Dnieper.

Country	Length (km)	Variants (km)	Note
Poland	439	I. 208 II. 196 III. 160	The variants are completely new shipping channels and additions to the 439 km!
Belarus	651		457 km cover Pripyat river between Pinsk and BY/UA border
Ukraine	970		
Total (depending on the selected variant)		**I. 2268** **II. 2256** **III. 2220**	

Table 1: Overview of total length of the proposed E40 waterway

Map 2: The outline map of the proposed E40 waterway with the indication of river basin based on the implementation of EU Water Framework Directive

[2] Restoration of Inland Waterway E40 Dnieper – Vistula: from Strategy to Planning, Final Feasibility Study Report, Gdansk, December 2015
http://czech.mfa.gov.by/docs/e40restoration_feasibility_study_en.pdf

The impacted area covers 392,949.08 km^2, which is inhabited by 28 690 834 people. It is important to note that the cost of building the E40 IWW was calculated between 9,5 and 11,9 Billion EUR in 2015 (depending on the variant), while the total revenue of Poland's state budget in the same year was roughly 67,9 Billion EUR[3].

The Royal Canal (Kanał Królewski in Polish, currently known as Dneprovo-Bugski Canal), which links the Bug and Pripyat rivers was built between 1775 and 1784. This channel was originally initiated in the 17th century when waterway played a more significant role in the transportation of goods. This canal is currently used as a justification that the E40 IWW would only be a restoration of former connection between the Baltic and Black Sea.

However, the development of E40 IWW is NOT a restoration project. The suggested navigation route has never functioned as its proponents suggest nowadays. The construction of E40 IWW would impact the untrammelled Bug and Pripyat rivers, and significantly change the hydro-morphology of Vistula and Dnipro rivers and their surrounding natural habitats. Thereby the E40 – if implemented – will lead to loss of biodiversity, habitat degradation, and decrease of ecosystem services.

THE PURPOSE OF THE DOCUMENT

This position paper identifies the most important environmental and sustainability challenges linked to the proposed E40 IWW and explains what alternative vision and solutions exist.

While promoters of E40 IWW claim the project to establish a new commercial highway between the ports of Gdansk, Poland and Kherson, Ukraine, which will attract investments and create new jobs, our consortium believes in another vision, which extends beyond the simple short-term economic calculation. Our partnership proposes:

- the 3 national governments to enforce the existing protected areas along the impacted rivers, and
- potential donors to fund a blue and green regional development based on natural solutions offered by ecosystem services.

ENVIRONMENTAL AND SUSTAINABILITY CHALLENGES

According to our partnership, the E40 IWW should not be implemented and promoted in the future because of the following points:

- It impacts 1) **protected areas** negatively and thus directly causes 2) **biodiversity loss and wetland habitats degradation**
- It is not aligned with 3) **existing policies** including various international convention
- It does not take 4) **sustainable development goals** into account with special attention on economic justification and human health, for instance downstream from the Chernobyl exclusion zone, along its 2,200 km length
- Its economic calculation ignores the concept of 5) **ecosystem services** for instance natural solutions for flood and climate change mitigation
- Considering the impact of climate change on 6) **weather anomalies**, Its core purpose, the inland navigation, does not offer a sustainable solution for transport

[3] https://www.mf.gov.pl/documents/764034/3397368/20160603_state_budget_revenue_XII_2015.pdf

Item 1 – Creating an effective network of Protected areas

The E40 IWW impacts protected areas of various designation actually almost throughout its total length. The affected areas include nationally designated protected areas from IUCN Categories[4] Ia (wilderness) to V (landscape protected areas)[5], Natura 2000 sites in Poland[6], Emerald Network sites in Belarus and Ukraine[7], Important Bird Areas[8] and Ramsar sites[9].

The total size of impacted Natura 2000 sites[10], and Emerald Network sites[11], is more than 25,400 km^2, which is slightly larger than Macedonia. There are also 17 Ramsar sites covering almost 3200 km^2 that are wetland sites designated of their international importance under the Convention on Wetlands[12], known as the Ramsar Convention, which is an intergovernmental environmental treaty established in 1971 by UNESCO, and coming into force in 1975.

These sites are recognized also based on the definition of protected areas of the Convention on Biological Diversity (CBD)[13]. This definition describes protected area as "a geographically defined area, which is designated or regulated and managed to achieve specific conservation objectives". All three countries are parties of the CBD and therefore made concrete commitment to conserve biological diversity and contribute to the Aichi Target 11, which aims at protecting 17% of the terrestrial area globally.

The implementation of E40 IWW would seriously threaten the effective preservation of those species and habitats (see item 2) that are conserved through the protected areas. Therefore, the three countries would face a challenge to deliver their commitments toward the CBD, Ramsar Convention and Bern Convention.

The FS suggests 3 alternative variants between Vistula and Terespol / Brest in order to not affect the Bug river valley which is entirely protected within the framework of EU Habitats and Bird Directives (Natura 2000 sites). However, the suggested variants will still have an effect on the Bug valley as the newly constructed channel will likely be filled with water which likely reduce water quality in the Bug river as well.

Item 2 – Halting Biodiversity loss & preserving Wetland Habitats

Based on the first-ever Global Wetland Outlook "35 per cent of the world's wetlands were lost between 1970-2015 with annual rates of loss accelerating from 2000"[14]. According to the FS and also the UNECE maps of European waterways[15], the E40 IWW would impact at least 2 rivers which are considered free flowing rivers in natural conditions: Bug river in Poland and the Pripyat river in Belarus and Ukraine.

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[4] https://www.iucn.org/theme/protected-areas/about/protected-area-categories
[5] www.protectedplanet.net
[6] designated based on the EU Birds and Habitats Directive http://natura2000.eea.europa.eu/
[7] designated based on the Bern Convention http://emerald.eea.europa.eu/
[8] https://www.birdlife.org/worldwide/programme-additional-info/important-bird-and-biodiversity-areas-ibas
[9] https://rsis.ramsar.org/
[10] http://ec.europa.eu/environment/nature/index_en.htm
[11] https://www.coe.int/en/web/bern-convention
[12] https://www.ramsar.org/
[13] https://www.cbd.int/
[14] http://www.unwater.org/the-global-wetland-outlook/
[15] https://www.unece.org/fileadmin/DAM/trans/main/sc3/European_inland_waterways_-_2012.pdf

These rivers but also those that have been modified host species and habitats that hold European and global importance.

One of the flagship species of the region is the Aquatic warbler (Acrocephalus paludicola), which is the rarest and only globally threatened passerine bird in mainland Europe (world population: 10-14,000 males). Once widespread on fen mires and wet meadow, it has disappeared from most of its former range due to habitat loss and degradation. Nowadays, its world population of only 9,000-14,000 vocalising males is confined to fewer than 40 regularly occupied breeding sites in only five countries, covering together only less than 400 km2 (area of occupancy) with four sites supporting over 80% of the global population.

The Aquatic Warbler regularly breeds in Belarus, Lithuania, Poland and Ukraine (irregularly in Germany and Hungary; populations in West Siberia and Latvia are probably extinct), with major populations in Belarus, Ukraine and Poland. 75% of the global population is located at the area impacted by the E40 IWW. Within the framework of the Convention on Migratory Species (CMS) the Aquatic Warbler Memorandum of Understanding (MOU) was concluded in Minsk, Belarus, under the auspices of the Convention on Migratory Species (CMS) and became effective on 30 April 2003 with the aim to safeguard the species.[16]

Image 1: Aquatic warbler

Other important species which are located within the impacted area include the following:

- Black stork Cyconia nigra
- Greater spotted eagle Aquila clanga

[16] https://www.cms.int/en/legalinstrument/aquatic-warbler

- Lesser white-fronted goose Anser erythropus
- Black-tailed godwit Limosa limosa
- Ruff Philomachus pugnax
- European eel Anguilla Anguilla
- Sterlet Acipenser ruthenus
- Western capercaillie Tetrao urogallus
- Wolf Canis lupus
- Otter Lutra lutra
- Eurasian lynx Lynx lynx

The area between the Baltic and the Black sea is clearly a biodiversity hotspot. One of the potential threats to the native species would be the potential disperse of invasive species.

The freshwaters of Europe comprise 26 habitats mainly dominated by plants that are strictly aquatic, emergent or amphibious, or by grasses or herbs that are adapted to occasional floods and able to develop during dry periods. More than 40% of European freshwater habitats are threatened[17].

One of the key habitat types is the so-called Riparian mixed forests of Quercus robur, Ulmus laevis and Ulmus minor, Fraxinus excelsior or Fraxinus angustifolia, along the great rivers (Ulmenion minoris). This habitat are forests from the river meadow, on alluvial soil, subject of flooding and composed from hardwood species such as oak (Quercus robur), narrow-leafed ash (Fraxinus angustifolia), and common ash (F.excelsior), various elmd and different percentage of some softwood species. This habitat type is important because its stabilizes the landscape of floodplains provides high biological diversity, but also recreational services.

Image 2: Riparian habitat types are the most endangered in Europe

[17] http://ec.europa.eu/environment/nature/knowledge/pdf/terrestrial_EU_red_list_report.pdf

The most important threats for Freshwater habitats in Europe are all related to human activities: hydrological changes (25%), climate change (25%), water pollution, invasive species. 3 out of the 4 most common threat is going to happen in case the E40 IWW is implemented. The first is change in the hydraulic conditions of water bodies, among which direct effects can stem from the constructions of dykes or artificial banks along the watercourses, water abstraction and alteration of the water level of lakes, ponds and rivers for fishing, agriculture and energy production.

Perhaps more slowly destructive, but also important and widespread threats are the introduction of alien, invasive species and climate change. The former can involve any category of organism, from microorganisms to vascular plants and animals. Alien species are responsible for long-term changes in the biotic and abiotic components of the habitats and ecosystems, affecting trophic chains and successional processes, transforming the natural characteristics and functionalities of habitats and altering the natural dynamic of the ecosystems.

The risk of pollution is also relatively high linked to the transportation. Leakage from ships, incidents might pose a threat to habitats and species diversity.

On the given stage of the feasibility study, a waterway variant least harmful to the environment cannot be pointed unequivocally. The least valuable in terms of nature seems to be variant II. It should be noted, however, that the degree and nature of the negative impacts will depend largely on the scope of the transformation of riverbeds, the choice of technology works and methods of mitigating environmental conflicts, which does not exclude variant III, which proved to be optimal in other aspects.

Item 3: Alignment with existing policies with particular attention to CBD

As states in earlier items, the E40 IWW would create a huge challenge for the three countries to fulfil their obligations and commitments made towards various international convention.

For instance, Ukraine states in its 5th national report to the CBD the decrease of wetland habitats. According to the document, the natural habitats are being deteriorated as a result of artificial drainage or watering of areas, industrial, residential and suburban construction and other anthropogenic effect[18]. Therefore, Ukraine set up a target to ensure regulation and fishing for all stocks of fish and other aquatic resources in a sustainable way, legally and with the use of the ecosystem approach in order to avoid overfishing; preventing significant negative impact on species endangered and vulnerable ecological systems by 2020.

In its National Action Plan for the Conservation and Sustainable Use of Biological Diversity for 2016-2020[19] Belarus recognized the degradation of natural ecological systems (rivers, lakes, mires, forests) as a result of disruption of the natural hydrological regime due to impact of adjacent drained areas, drainage melioration and hydrotechnical construction as a main problem to tackle. The building of E40 would further increase this problem and Belarus will unlikely be able to deliver its target 8 to ensure the protection and sustainable use of natural and near-natural ecological systems most important for landscape and biological diversity conservation (on the territory with the area of at least 22% of the Republic's territory) by means of optimization of the specially protected areas system (at least 8% of the Belarus' territory) and natural areas subject to peculiar protection.

[18] https://www.cbd.int/doc/world/ua/ua-nr-05-en.pdf
[19] https://www.cbd.int/doc/world/by/by-nbsap-v2-p2-en.pdf

In its fifth national report to CDB, Poland recognized that Wetland birds (31 species) are a group facing the most severe decline[20]. The same report states that unsuitable water management (an increasing number of activities related to the regulation and development of rivers, barrages and levees, as well as activities related to agricultural drainage systems). With reference to these the country defined that is among the most important measures from viewpoint of habitat protection.

While recent reports call for a Paris agreement like international target on biodiversity protection, the E40 IWW will make more difficult for the 3 countries to meet the CBD targets and their own commitments to biodiversity protection

Item 4: Sustainability including risking human health downstream of Chernobyl

According to the UN sustainable development goals[21] (SDGs), countries should Invest in the well-being of the citizens living along the suggested E40 IWW through sustainable development that respects the ecological limits to growth. Based on the feasibility study, various targets of the SDGs are challenged through the development of E40.

I relation to good health and well-being (SDG 3.), the E40 FS does not provide a clear analysis of the potential impact of E40 IWW on the radioactive contaminated silt in the Chernobyl exclusion zone. As the waterway crosses this area, the E40 poses serious challenge on human health and well-being downstream in Ukraine and threatens the access to safe drinking water of the citizens of Kyiv. This impact is against the SDG target 3.9, which aims to reduce the number of deaths and illnesses linked to hazardous chemicals by 2030 (indicator Mortality rate attributed to unsafe water).

The SDG 6. covers the issue of clean water and sanitation and aims to providing the access to drinking water. Its target 6.1. states the importance to achieve universal and equitable access to safe and affordable drinking water for all by 2030. At the same time target 6.6. require countries to protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes by 2020.

While SDG 13. Recognizes the important of strengthening resilience and adaptive capacity to climate-related hazards and natural disasters in all countries (target 13.1), this aspect of the natural ecosystems is ignored in the feasibility study.

Finally, the UN SDG 15. (Life on land) highlights that national governments should ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements such as the CBD by 2020. This request would hardly be fulfilled in case of implementing the E40 IWW.

None of the above targets of SDGs are considered within the E40 IWW feasibility study. However, the study lacks proper justification of financial sustainability and economic soundness for the E40 IWW. The study does not cover the issue of ecosystem services and the potential natural solutions to flood and climate change mitigation. Based on an economic analysis of the feasibility study by experts of University of Warszaw, the report did not take the investment costs into account when calculating the economic benefits of E40 IWW. The project will result in a heavy burden on tax payers while financially benefiting only a few private investors.[22]

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[20] https://www.cbd.int/doc/world/pl/pl-nr-05-en.pdf

[21] https://sustainabledevelopment.un.org/?menu=1300

[22] Reference to https://stope40.org/en/articles/economic-mistakes

Another economic analysis of the feasibility study highlights the lack of proper risk assessment linked to the potential return on investment of E40 IWW[23].

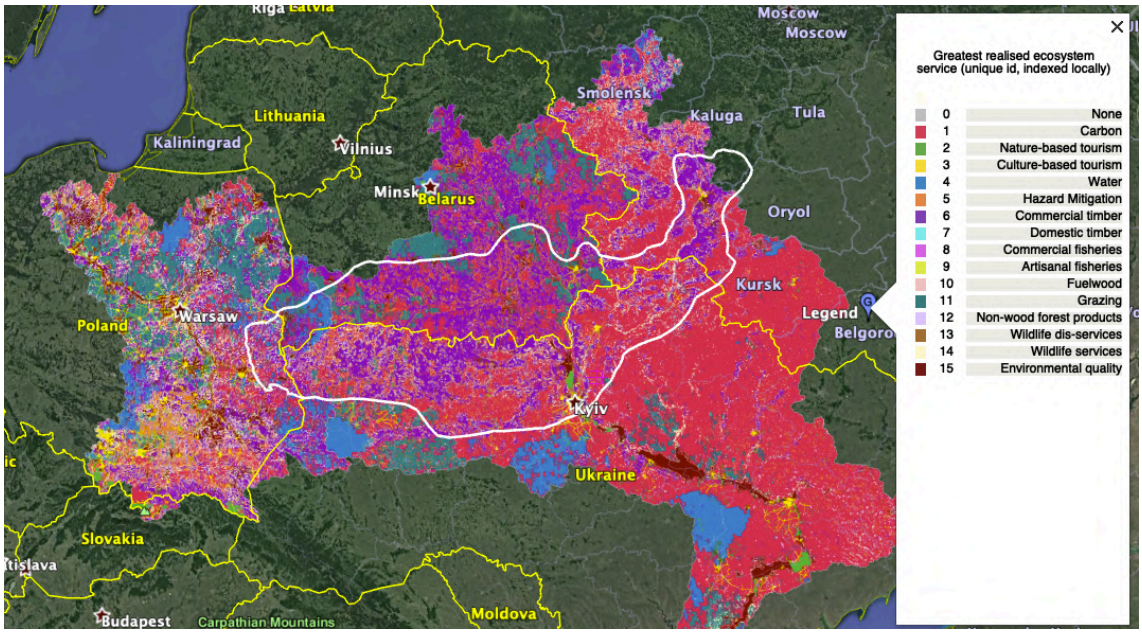
Item 5: Taking Ecosystem services into account

As part of Item 1 and 2, the importance of wetland habitats was explained from biodiversity point of view. Wetlands including riverine habitats are essential biocorridors and harbours of high biodiversity. However, these habitat types provide other essential services to the communities living along the rivers and beyond.

Supporting services	Provisioning services	Regulating services	Cultural services
Nutrient recycling Primary production Soil formation	Raw materials including timber to local population Access to clean water Genetic resources	Carbon sequestration Climate regulation Water purification Flood mitigation	Historic values Recreational services Science and education

Table 2: Ecosystem services provided by wetland habitats

These services, the importance of which is also recognized through international treaties, include hydrological services such as water retention, self-purification and groundwater supply. Floodplain habitats provide natural solutions to give safe access to drinking water. These services are also recognized through the implementation of the EU Water Framework Directive (WFD)[24], which is adopted in Poland and is currently being implemented in Belarus and Ukraine through the EU Water Initiative +East (EUWI+East) project[25].



Map 3: The Greatest realised ecosystem services in Polesia and on the basin of Dnipro and Vistula rivers

[23] https://stope40.org/en/articles/negative-economics
[24] http://ec.europa.eu/environment/water/water-framework/index_en.html
[25] http://euwipluseast.eu/en/

Apart from such essential benefit, riverine habitats stabilises the landscape of floodplains through reducing bank erosion and decreasing catastrophic effects of floods. The flood mitigation potential of natural ecosystems is getting more important as the frequency of floods – including flash floods – increases due to the climate change[26].

Wetlands mitigate the impact of climate change and store large amount of carbon. In case of changing hydrological conditions, the carbon storage capacity of mires for instance would decrease significantly[27].

Last but not least wetlands provide unique cultural services such as recreational opportunities, infrastructure to green / ecotourism, aesthetic and education services.

As the above-mentioned ecosystem services were not taken into account in the feasibility study, it is assumed that they were not included in the calculation of costs and benefits at all. In the lack of proper research and scientific information, the promotors of E40 IWW must take the precautionary principle into account (see the section with Our demands).

In order to avoid the challenges and environmental threats, the E40 IWW should not be built. Our partnership believes that there is an alternative sustainable development scenario for the impacted regions, which can be coupled with the necessary investment from funding available for developing Green Economy in Europe.

Item 6: Weather anomalies and inland navigation

An exceptionally dry summer in 2018 has caused havoc across Europe. The year was the fourth-driest and by far the hottest year since records began in 1881. According to the research conducted by the Potsdam Institute for Climate Impact Research, there will be an increasing instability in relation to weather conditions, and extremes will occur more frequently. According to the German Weather Service (DWD), climate change means not only an increase in average temperatures, but also an increase in the frequency of weather anomalies. The summer of 2018 was exceptional with its intensive drought and prolonged heat, but the likeliness of such extreme periods is expected to increase in the future.

Over time, more frequent low water events will make inland water navigation increasingly unstable and unsustainable. Due to low water levels inland shipping was partially discontinued on the majority of European rivers in 2018. Rivers such as the Elbe, Rhine, Oder and Danube carried so little water that navigation was restricted or discontinued. The drought in 2018 skyrocketed freight prices, and some costs are already being felt by consumers, with higher prices for petrol and home heating oil.

The shipping lane could be deepened, but this would take years, if not decades, and would cost millions. Even if that were to succeed, it would remove only one bottleneck on a river that is just starting to show how many trouble-spots it has. The increasing frequency of weather anomalies also contributes to developing new inland waterways, such as the E40 unreasonable, uneconomic and not sustainable.

[26] http://science.sciencemag.org/content/357/6351/588
[27] Rob Field et al, TESSA analysis of Polesia

OUR VISION

We want the national governments to enforce the protection of riverine habitats and match it with a sustainable regional development scenario between the Baltic and the Black Seas

The Polesia, spanning more than 186.000 km2 (about half the size of Germany), hosts one of Europe's largest almost natural floodplain, characterised by pristine forests and wetlands. The heart of Polesia is the Pripyat river, which extends some 700 kilometres. Its countless meanders, tributaries and oxbows shape the region into a true labyrinth of water, islands, swamps, wetlands, and alluvial forests. Despite major impacts on nature during the Soviet period, large expanses have remained completely undisturbed by humans. The extensive forests offer large mammals, such as brown bears, wolves, lynx and European bisons, refuge in the wetlands of the Pripyat river. Numerous bird species, among them globally endangered species such as the aquatic warbler and the greater spotted eagle, roost in the wetlands of the Pripyat river. The flood plains are a key resting place for millions of migratory birds during the spring and fall. Polesia's wild and pristine rivers and landscape support the economies of at least 4 European countries through ecosystem services such as water retention, flood mitigation, clean air and carbon storage.

The plan of E40 inland waterway, to link the Black Sea with the Baltic Sea, will irreversibly destroy ecosystem functions and forever change this landscape, cutting through key habitats and critical refuges and impacting on the resilience of the ecosystems to provide the services such as water retention, flood mitigation, clean air and carbon storage.

In addition, the planned waterway E40 will put the citizens downstream at great risk by releasing currently fixed radioactive sediments caused by the Chernobyl disaster, which will then pollute the drinking water of millions of people for centuries to come. In times where railroads offer better and more economic alternatives and climate change puts river navigation at huge risks, this development must be reconsidered in the context that exists today and consideration given to the various critical functions that this European Amazon delivers to the region and its citizens.

A partnership of national and international civil society organisatons from conservation to business sectors strives to keep the universal values of the Polesia for the citizens and future generations of Belarus, Poland and Ukraine and the wider Europe through repealing the destructive proposal of E40 navigation waterway.

OUR PROPOSAL

The socio-economic circumstances and environmental conditions, which might have justified navigation opportunity between the North and South in the 18th century, changed (eg. acceleration of climate change) by the 21st century.

- There are roads and railway connections, which provide quicker and more economic alternative transportation means.
- The value of free flowing, non-modified rivers has increased in the eyes of contemporary society as they offer natural solutions to flood protection, drinking water purification and climate change mitigation.

Therefore, our partnership suggests a new approach to address transportation and regional development needs for the sake of enforcing nature conservation efforts done so far by the 3 national governments. This new approach would guarantee the continued protection of wetland

habitats, contribute to the countries' commitment to halt biodiversity loss, provide natural solution to climate and flood mitigation, while be a green economic alternative in the region.

The National Governments will have to invest in sustainable regional development through funding available at the European Union or the European Investment Bank's Natural Capital Financing Facility. The investment in green economy will make the territory between the Baltic and Black Sea a role model for other European regions.

OUR DEMANDS

Following upon the basic rights set up by the Aarhus Convention to access and receive information with regard to our environment, our partnership calls the authorities for the following points to enforce in relation to the further planning of E40 IWW

1. Environmental accountability

- The area which is impacted by the E40 IWW must clearly and transparently be defined. The process to delineate the territory should reflect hydro-morphological connection as well as migration routes of various species.
- There is a lack of scientific certainty in relation to the impact of E40 IWW in terms of hydrology, climate, biodiversity. Therefore, the precautionary principle must be considered in order to ensure the lack of evidences of not used to further the implementation of E40 IWW. As defined by the EU, the precautionary principle applies where scientific evidence is insufficient, inconclusive or uncertain and preliminary scientific evaluation indicates that there are reasonable grounds for concern that the potentially dangerous effects on the environment, human, animal or plant health may be inconsistent with the high level of protection chosen by the EU[28].
- The hydro-morphological classification of impacted rivers must be based on scientific evidences. The Pripyat for instance is considered as a free-flowing river in the UNECE documentations, which should be considered.

2. Public participation

The EU Water Framework Directive (WFD) requires a strong stakeholder involvement in the development and implementation of River Basin Management Plans[29] (RBMP). As WFD is adopted in Polish legislation and it is currently implemented through the Pripyat and Dnipro RBMPs in Belarus and Ukraine, citizens and civil society organizations should be able to actively participate in the discussion about the development of E40 IWW.

3. Transparency

The implementation of E40 IWW would require significant financial commitment from the 3 concerned countries. As the E40 would mean a heavy burden on tax payer, the financial transparency about planning is critically important. Therefore, our partnership calls the governments and private and public financial institutions to be fully transparent about any financial commitment in relation to this infrastructure development.

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28 http://ec.europa.eu/environment/integration/research/newsalert/pdf/precautionary_principle_decision_making_under_uncertainty_FB18_en.pdf

29 https://circabc.europa.eu/sd/a/0fc804ff-5fe6-4874-8e0d-de3e47637a63/Guidance%20No%208%20-%20Public%20participation%20%28WG%202.9%29.pdf

WHO WE ARE

Our coalition includes 5 organisations from 4 countries.

APB – BirdLife Belarus

APB is the Birdlife partner organization from Belarus, the mission of which is the conservation of biological diversity for the benefit of the present and future generations and involvement of people in active nature protection activities. The organisations key activities include the study and conservation of wild birds as well as participation in detecting, conservation and restoration of habitats important for birds

Bahna, Belarus

The aim of Bahna from Belarus is to prevent further degradation of the environment and to preserve natural habitats and biodiversity of our country. Our main goals for the forthcoming period include creating new wildlife preserves and expanding those already existing, increasing their efficiency; working on and promoting scientific methodological development in this field; improving legislative and regulatory systems concerning environmental policy as well as developing environmental management strategies. The organization coordinates the civil society actions against E40 IWW in Belarus.

Frankfurt Zoological Society, Germany

FZS invests in wilderness areas of global significance, in what we call “legacy landscapes” – areas of aesthetic and natural values, with pristine landscapes, important ecosystem processes (eg migrations) or ecosystem values and harbouring endemic and endangered species.

OTOP – Polish Society for the Protection of Birds

OTOP is the Birdlife partner organization from Poland with the mission of protecting birds and their habitats and establish and manage new bird reserves. The organization has strong educational work in order to increase public support for nature conservation.

NECU – National Ecological Centre of Ukraine

National Ecological Centre of Ukraine (NECU) is a non-governmental not-for-profit organization created in 1991 when Ukraine has obtained independence. NECU consolidates individuals for common action to protect the environment. Among NECU members are scientists, journalists, artists, students and other people who are willing to add their own effort to environmental protection. The organization has branches in a dozen of Ukrainian cities. NECU works to bring environmental consideration into the core of any decision making.