

# **Komarnica canyon, the screaming silence of untouched nature under threat**

The battle for its preservation from hydroelectric power

Jelena Popović and Andrijana Mićanović - Montenegrin Ecologists Society  
Groningen, 15 April 2024



# Komarnica canyon - Timeless beauty of pristine landscapes

**Nature Park**

**Monument of nature**

**Emerald candidate site**

**Future Natura 2000 site**

**Important Plant Area - IPA**

**Key Biodiversity Area - KBA**

**UNESCO site (could be)**





## Refuge of LIFE and biodiversity hotspot



# HYDROPOWER PLANT "KOMARNICA"



**Approximately 7% of total energy production at best**

- Annual production - 213 GWh
- Installed power - 171.9 MW
- Dam height - 171 m
- Dam volume - 313,256 m<sup>3</sup>
- The largest length of the reservoir (along the Pridvorica branch, tributary) - 17.6 km.
- The average width at full accumulation - about 150-200 m.
- In March 2022, Electric Power Company of Montenegro (EPCG) received a concession for the project.
- Predicted costs (2019) <300 million
- Not even half of the network losses

# The actual situation and needs for electricity - Montenegro

Based on: Energy Balance of Montenegro for the Year 2024

Diagram 1: Planned Available Power Plant Capacities in Montenegro for the Year 2023 (MW)

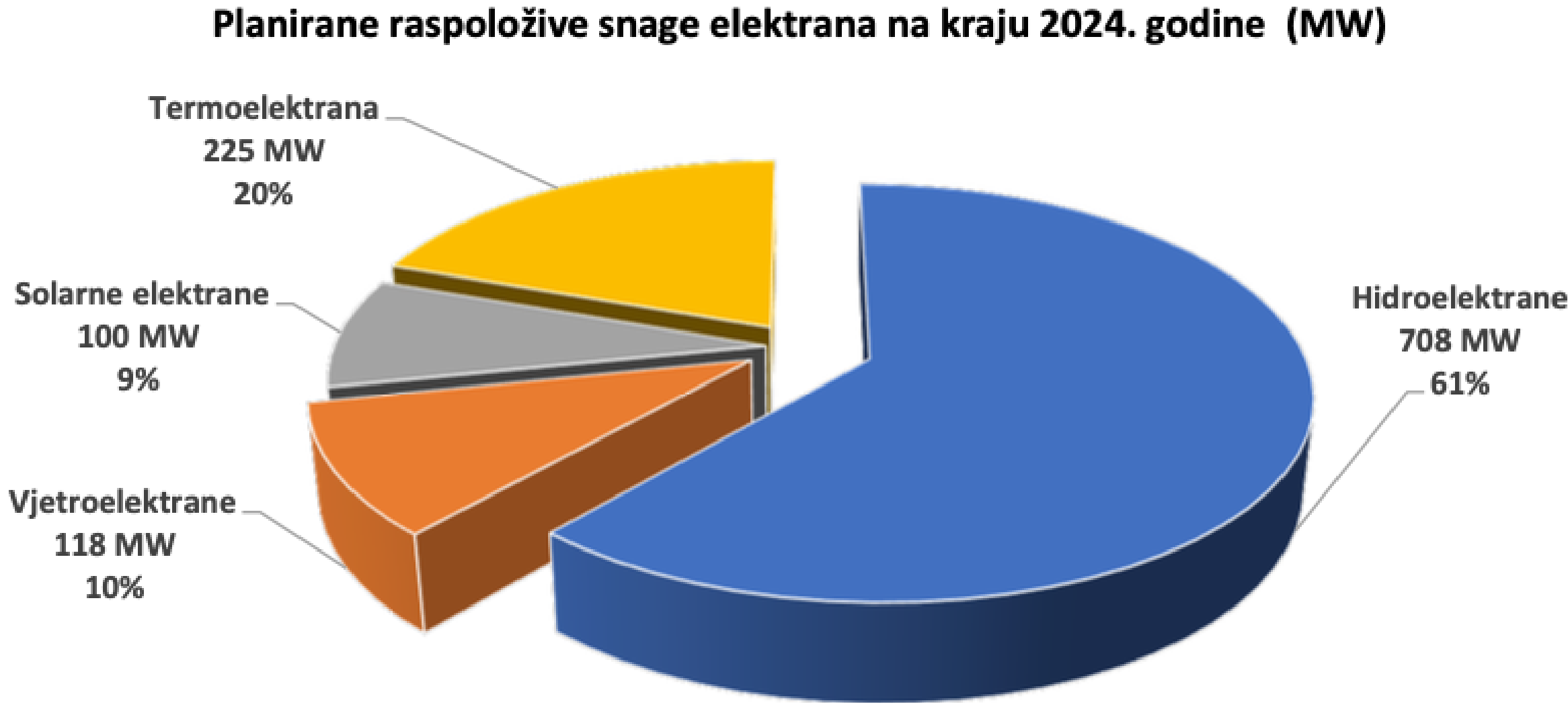


Diagram 3: Structure of Electricity Production in the Year 2024

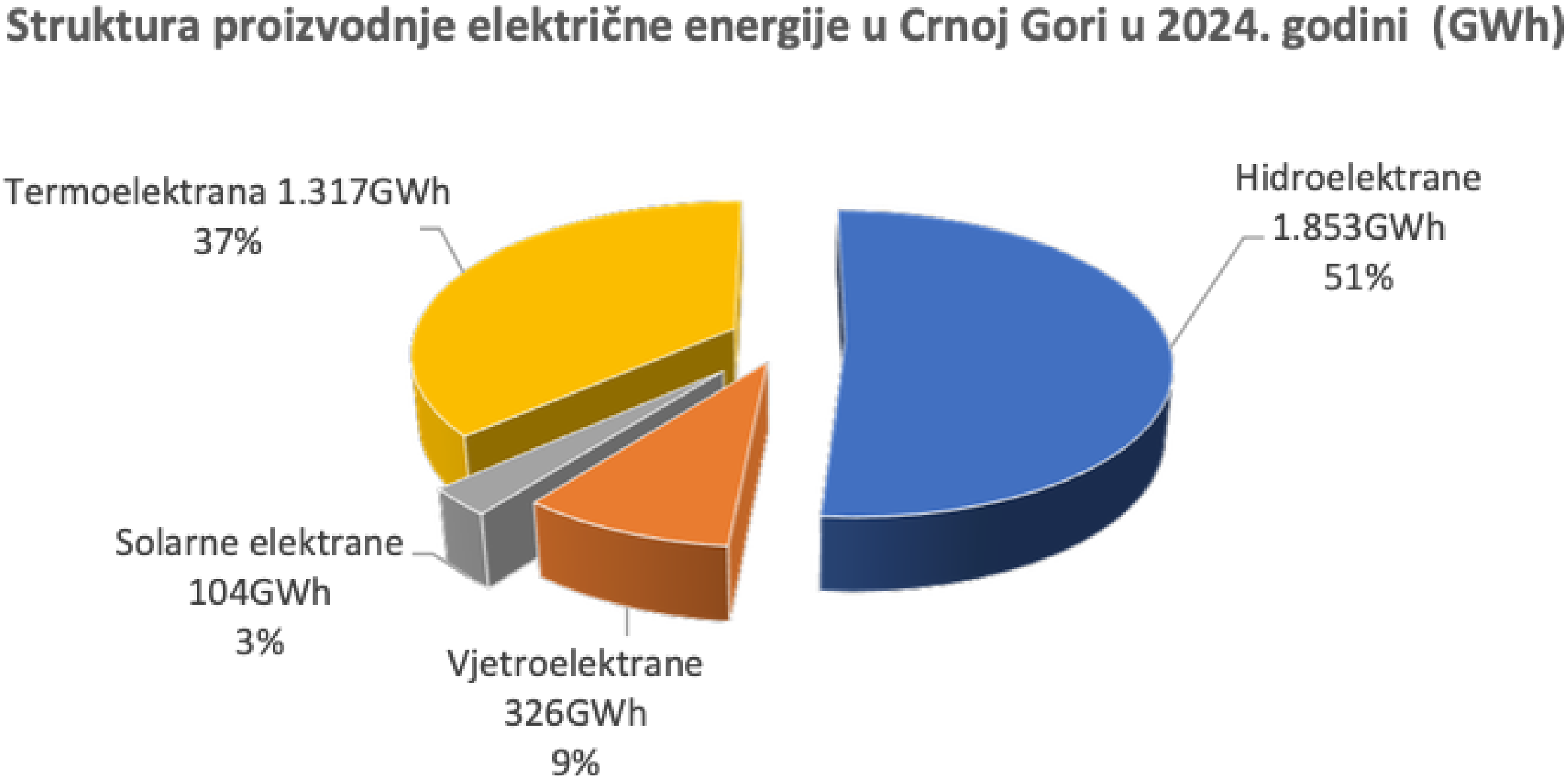


Table 2. Total Electricity Production, Demand and Balance (Imports/Exports)

ENERGETSKI BILANS	2022.			2023.			2024
	Planirano	Ostvareno	Realizacija plana	Planirano	Ostvareno*	Realizacija plana	Planirano
	GWh		%	GWh		%	GWh
Proizvodnja u Cmoj Gori	3.493,50	3.235,07	92,60	3.598,26	3.984,22	110,73	3.600,00
Potrebe	3.559,97	3.096,92	86,99	3.111,24	3.165,88	101,76	3.117,00
<b>Saldo (Proizvodnja–Potrebe)</b>	<b>-66,47</b>	<b>138,15</b>	<b>/</b>	<b>487,02</b>	<b>818,34</b>	<b>/</b>	<b>482,00</b>

Table 13. Planned and actual grid losses for 2022, 2023, and predictions for 2024, expressed in GWh

ELEMENTI BILANSA	2022			2023			2024
	Planirano	Ostvareno	Realizacija plana	Planirano	Ostvareno *	Realizacija plana	Planirano
	GWh		%	GWh		%	GWh
<b>Gubici ukupno</b>	<b>494,14</b>	<b>477,21</b>	<b>96,57</b>	<b>463,36</b>	<b>470,30</b>	<b>101,50</b>	<b>445,08</b>
Gubici distribucije	328,07	334,96	102,10	322,50	326,18	101,14	294,54
Gubici prenosa	166,07	142,25	85,66	140,86	144,12	102,32	150,54

# Save Komarnica Initiative



КОМАРНИЦА  
НЕМА  
ЦИЈЕНУ

TRUD JE  
UZALUDAN  
AKO  
SE  
PRIRODA  
PROTIVI

I DON'T WANT A DAM  
I DON'T GIVE A DAM

MRS

NO VOOU BRANI  
NA DOBROJ JE STRA

CUVAJMO  
OSTAVI  
KOMARNICU  
NAMA  
DUJEM

BITI NA VLASINU  
VODA

Kroz  
Lazane  
a NE  
BRANI

UJEDINJENI  
KOMARNICU

SPASIMO  
KOMARNICU

Prav  
na  
vodu

HE ULOG  
HE KOMARNICA  
HE BUK BUELA  
HE BASTRICA  
HE JADICI  
HE VRANCI

WOLNE RZEKI

HEKY BRANI



# Annual Protest-Educational Camps







Annual Protest-Educational Camps



# Podnijeta žalba Sekretarijatu Bernske konvencije zbog koncesije za HE Komarnica

Crnogorsko društvo ekologa, Društvo mladih ekologa Nikšić i organizacija KOD podnijeli su žalbu Sekretarijatu Bernske konvencije, povodom odluke Vlade da odobri koncesiju Elektroprivredi (EPCG) za izgradnju hidroelektrane (HE) Komarnica.



## DRUŠTVO

# Ekološke NVO podnijele žalbu međunarodnoj organizaciji zbog odluke o gradnji hidroelektrane na Komarnici



TS 110/35 kV Pljevlja 1 (Židovići)	
TS 110/35 kV Tivat	
TS 110/35 kV Ulcinj	
TS 110/35 kV Vilusi	
TS 110/35 kV Virpazar	

<b>TS 220/X kV</b>	
TS 220/110/35 kV Mojkovac	
TS 220/110/35 kV PG1	

<b>TS 400/X kV – Postojeća</b>	<b>TS 400/X kV - Plan</b>
TS 400/110 kV PG2	TS Cevo 400/110
TS 400/110/35 kV Lastva	TS 400/110/35 kV – Brezna
TS 400/110/35kV Ribarevine	
TS 400/220/110 kV Pljevlja 2	

<b>Hidroelektrana (HE) – Postojeća</b>	<b>HE - Plan</b>
HE Perućica	HE Boka
HE Piva	HE Komarnica
	HE Kruševo

<b>Vjetroelektrana (VE) - Postojeća</b>	<b>Zone planiranih vjetroelektrana</b>
VE Krmovo	VE Brajci
VE Možura	VE Gvozd
	VE Korita
	VE Bijela

<b>Solarna elektrana (SE) - Plan</b>
SE Briska Gora
SE Dragalj
SE Prediš
SE Slano
SE Velje Brdo
SE Montečevo
SE Željezara
SE Krupac
SE Velstovo

proposed projects on the OUV of the property are assessed in line with the Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to taking any decision that would be difficult to reverse, as follows:

- a) the State Party of Bosnia and Herzegovina to confirm the status of the Buk Bijela HPP project and to ensure that potential impacts of the project on the OUV are assessed through an updated Environmental Impact Assessment (EIA), in close consultation with the State Party of Montenegro,
- b) the States Parties of Bosnia and Herzegovina and Serbia to ensure that the potential impacts of all planned HPP projects in the upper Drina catchment on the OUV are assessed, including cumulative impacts, through a Strategic Environmental Assessment, in collaboration with the State Party of Montenegro,
- c) the State Party of Montenegro to ensure that potential impacts of the Komarnica HPP on the OUV are assessed during the evaluation of the EIA, with specific considerations for the implications of this project on the potential future extension of the property into the Dragišnica and Komarnica Nature Park, and not to approve the project if it would result in negative impacts on the OUV,
- d) the States Parties of Montenegro, Bosnia and Herzegovina and Serbia to communicate updated information and documentation on the above to the World Heritage Centre, for review by IUCN;

is moreover the State Party to continue to monitor any downstream impacts inside the property following the completion of the Smokovac-Mateševo section of the Bar-Boljare railway, as well as the status of key species that are attributes of the OUV, in particular Atlantic Salmon;



**HE KOMARNICA**  
ELABORAT PROCJENE UTICAJA HE KOMARNICA NA ŽIVOTNU SREDINU



Naručilac:  
Elektroprivreda Crne Gore AD NIKŠIĆ 



A person with long hair is kayaking on a river. The kayak is loaded with gear, including a large black bag. The river is surrounded by lush green trees, and sunlight filters through the canopy, creating a dappled light effect on the water. The water is slightly rippled, and there are some ripples in the foreground.

# Scientific expeditions

**EU Biodiversity  
Survey  
2023, 2024**

**Taxon Expeditions  
2024**

**Biology student  
camps  
2024**







MONTENEGRIN ECOLOGISTS  
**SOCIETY**

**Thank you for your attention !**

**Questions?**

Montenegrin Ecologists Society;  
[drustvoekologa@gmail.com](mailto:drustvoekologa@gmail.com)  
[drustvoekologa.me](http://drustvoekologa.me)