

Rebecca Harms,
Member of the European Parliament
European Parliament
ASP 06 F356
Rue Wiertz 60
B- 1047 Brussels

Tel: +3224857695
Fax: + 32-2-28 - 49695
gesa.storz@europarl.europa.eu

www.rebecca-harms.de
www.rebecca-for-europe.eu

Dear Mrs. Rebecca Harms!

We are writing in order to bring an important issue of saving a unique natural ecosystem Polonyna Borzhava in the Ukrainian Carpathian Mountains to your attention, and hopefully with your kind help to the attention of the European community as well. **The intentions of Gurish company, based in Turkey, to build a 120-megawatt wind power plant on one of the highest and longest mountain ranges of the Ukrainian Carpathians – Polonyna Borzhava** - have caused a massive public outcry in Ukraine among ecologists and scientists as well as among tourists, sportsmen, nature enthusiasts, public activists and local population in general, who are deeply concerned with the dramatic changes to the environment resulting from the implementation of this project.

We support the development of all kinds of renewable energy industries in Ukraine, including wind power engineering. However, we strongly believe that construction of any industrial facilities must not conflict with environmental protection, environmental legislation of Ukraine, sustainable development of the region, the best interests of the local population and all Ukrainians as well as saving of Divine Creation – nature – in all its beauty. Nevertheless, the above mentioned project would result in ecological risks not limited to local significance, but influencing the whole region.

Polonyna Borzhava is a unique natural area, a part of **the Emerald Network of Europe** (register number UA0000263), a place of valuable habitats for flora and fauna species protected under Ukrainian legislation and international conventions. In particular, 31 plant species and 26 animal species listed in the Red Book of Ukraine, 96 animal species protected under international agreements and 6 Natura 2000 biotopes are documented in the area. A considerable part of valuable flora and fauna species, as well as habitats protected under legislation, are documented precisely on the plots of land allotted for construction. The intended construction works would lead to their direct and irrecoverable destruction.

Furthermore, international migration flyways of birds and bats pass through Polonyna Borzhava. Placing 34 wind turbines up to 180 meters tall on the mountain ridge would put the passing birds and bats, many of them listed in the Red Book of Ukraine and various environmental lists of European and universal significance, into serious danger.

What is more, a significant part of the flow of such rivers as Latoritsa and Borzhava, **the main influx of Tysza River**, is formed on the slopes of the Borzhava mountain range, where construction of the wind power plant is planned. Large-scale excavation work during construction of the wind power plant on Polonyna Borzhava will cover more than 20 km of its territory and will inevitably lead to: bedding displacement and change of the hydrological and geochemical regime of aquifers; intensification of the processes of planar soil flushing and linear erosion, landslides, which in turn will result in the flushing of a large volume of soil in the nearest watercourses leading to their blackening or drying out.

Polonyna Borzhava is also one of the most popular places for tourism and recreation in Ukraine. Ecological tourism is developing here, including ecological recreation, hiking, mountain biking and winter sports; in addition, international paragliding competitions are held in the area. Tourism is one of the major financial sources for local communities, and building it on the principles of sustainable development would increase ecological awareness of the local population. However, constructing a wind power plant on the narrow ridge would make a number of popular hiking trails impossible to use, put a stop to the development of winter sports and promote consumptive attitude to nature among the local population, who view the concept as a profit-oriented exploitation of nature rather than a power efficient project.

Certain decisions of public officers are especially disturbing, in particular the decisions regarding land allotment for construction as well as environment impact assessment which have been upheld against the best interest of the national and international community and in violation of the Ukrainian legislation. As for the local communities, they are often under pressure from central authorities. Considering the administrative pressure, the issue needs international attention and expert support. Numerous administrative decisions have potential for anticorruption investigations. Activists and public organizations have already prepared a number of legal actions and petitions to law enforcement authorities with the purpose of cancelling the decisions upheld in violation of the law.

Furthermore, construction of an industrial facility on the summit of one of the longest and most beautiful ridges of the Ukrainian Carpathians, on the territory of the Emerald Network and in a recreational area would entail violations of a number of international agreements and conventions ratified by Ukraine, namely:

- 1) The Framework Convention on the Protection and Sustainable Development of the Carpathians (dated May 22, 2003);
- 2) The Convention on the Conservation of European Wildlife and Natural Habitats, (Bern Convention, 1979);
- 3) The European Landscape Convention (2000);
- 4) The Convention on the Conservation of Migratory Species of Wild Animals, (Bonn Convention, 1979);
- 5) The Agreement on the Conservation of Populations of European Bats, 1999;
- 6) The Council Directive 2009/147/EC on the conservation of wild birds, Birds Directive;
- 7) The Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora, Habitats Directive.

A substantial part of the local population is adamantly opposed to the wind power plant construction and is ready to protect its interests by all possible lawful means including direct civil resistance. Public organizations and the Church are drawing the public attention to the risks of illegitimate and ecologically harmful construction.

All in all, building a wind power plant on Polonyna Borzhava would have more negative consequences for the environment and the society than positive effects as a renewable energy production facility. Unfortunately, projects such as this one promote the increasingly popular opinion that wind power plant technologies are only used by businesses in order to gain profit from reduced "green tariffs" while being harmful to the environment. We believe that a very poor choice of the location for wind power plant construction in this case would significantly damage the image of green energy as a whole, would negatively impact its currently growing trend and would slow down the development of renewable power sources in Ukraine, generally putting the values of sustainable development in the Transcarpathian region and in Ukraine at a disadvantage.

Finally, this issue has a significant public component since it is an opportunity for the public organizations to demonstrate their ability to efficiently protect the best interests of the region, as well as for the local communities and activists to protect the needs of the society on the principles of sustainable development in spite of individual business interests and administrative pressure.

The region is in urgent need of an example of successful and civilized protection of its social and ecological values with the support of European institutions, while the issue is already acquiring the characteristics of an open conflict.

We would be happy to provide detailed information and all documentation related to this issue, which our initiative group is trying to solve, on your first request.

Taking into account all of the above mentioned, we would like to kindly ask you to use your valuable experience and influence as a member of the European Parliament and an activist of the European green movement in order to contribute to the following:

- sharing this information with German, European and international organizations dealing with ecology and electric power industry;
- engaging reputed international experts and organizations to professionally inspect the issue;
- helping to organize a professional dialogue which could draw the attention of international and Ukrainian community to the harm that may be caused by construction and operation of the wind power plant;
- any advice or recommendations you could share with us from your vast experience in ecology protection and civil activities.

We are kindly asking you to contact the relevant authorities in Turkey, the European Union and Ukraine with a request to take into account the much needed protection of the natural and recreational value of Polonyna Borzhava and suggest relocating the intended construction of the 120 megawatt wind power plant to a less valuable area, as well as to use all means available to prevent massive anthropogenic intervention into the unique mountain area and to conserve Polonyna Borzhava in its natural state.

Sincerely yours,

Interreligious and environmental civil forum of Eastern Europe (IRCEF)

Bokotey Alexander

International institute of human and globalistics "Noosphaera"

Oleg Luksha

Agency of local development and information resources "Europolis"

Pavlo Ryabokon

NGO "Ecosphere"

Kateryna Stankiewicz-Koval

NGO "Kurortopolis-Svalyava"

Ivan Revtyi