

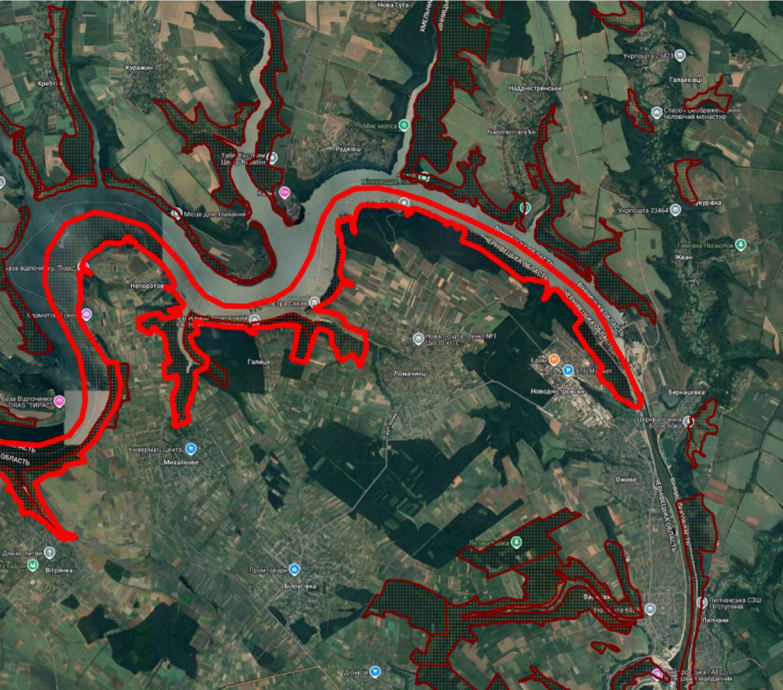
PECI PUBLIC CONSULTATION: **RECEIVED COMMENTS** (listed in order of receipt)

Centre of Environmental Initiatives

"Ecoaction" / Екодія

Our only comment on the MD-UA (E15) project would be that there are Khotyn National Nature Park (see attached, E15 Nature Park) and territories of the Emerald Network (see attached, E15 Emerald Network) on the Ukrainian side.

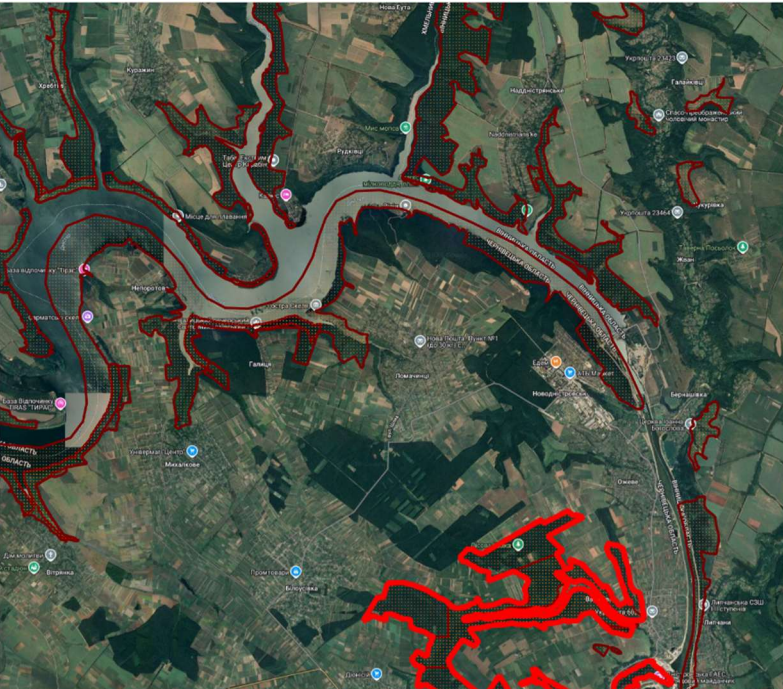
So any construction shouldn't be done there.



Identify Results

Feature	Value
WDPA_WDOECM_Mar2026_Public_UKR_shp-polygons	Khotynskiy National Nature Park
NAME_ENG	Khotynskiy National Nature Park
(Derived)	
(Actions)	
SITE_ID	555719479
SITE_PID	555719479
SITE_TYPE	PA
NAME_ENG	Khotynskiy National Nature Park
NAME	Khotynskiy National Nature Park
DESIG	Emerald Network
DESIG_ENG	Emerald Network
DESIG_TYPE	Regional
IUCN_CAT	Not Reported
INT_CRIT	Not Applicable
REALM	Terrestrial
REP_M_AREA	0
GIS_M_AREA	0
REP_AREA	94.85999999999999
GIS_AREA	94.395153085076201
NO_TAKE	Not Applicable
NO_TK_AREA	0
STATUS	Designated
STATUS_YR	0
GOV_TYPE	Federal or national ministry or agency
GOVSUBTYPE	Not Applicable
OWN_TYPE	State
OWNSUBTYPE	Not Applicable
MANG_AUTH	Administration of the Khotynskiy NNP
MANG_PLAN	Not Reported
VERIF	State Verified
METADATAID	2004
PRNT_ISO3	UKR
ISO3	UKR
SUPP_INFO	Not Applicable
CONS_ORI	Not Applicable
INLND_WTRS	Not Reported
OECM_ASMT	Not Applicable

Mode: Current Layer
View: Tree



Identify Results

Feature	Value
WDPA_WDOECM_Mar2026_Public_UKR_shp-polygons	Vasylivski i Rozkopynski gullies
NAME_ENG	Vasylivski i Rozkopynski gullies
(Derived)	
(Actions)	
SITE_ID	555720068
SITE_PID	555720068
SITE_TYPE	PA
NAME_ENG	Vasylivski i Rozkopynski gullies
NAME	Vasylivski i Rozkopynski gullies
DESIG	Emerald Network
DESIG_ENG	Emerald Network
DESIG_TYPE	Regional
IUCN_CAT	Not Reported
INT_CRIT	Not Applicable
REALM	Terrestrial
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GIS_M_AREA	0
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GIS_AREA	20.196965175338701
NO_TAKE	Not Applicable
NO_TK_AREA	0
STATUS	Designated
STATUS_YR	0
GOV_TYPE	Federal or national ministry or agency
GOVSUBTYPE	Not Applicable
OWN_TYPE	State
OWNSUBTYPE	Not Applicable
MANG_AUTH	Chemivski Regional State Administration
MANG_PLAN	Not Reported
VERIF	State Verified
METADATAID	2004
PRNT_ISO3	UKR
ISO3	UKR
SUPP_INFO	Not Applicable
CONS_ORI	Not Applicable
INLND_WTRS	Not Reported
OECM_ASMT	Not Applicable

Mode: Current Layer
View: Tree

PECI 2026 – Comments

English draft for submission together with the existing Bankwatch comments and annex package

Projects: E01 Gacko–Brezna and E03 Brezna–Sarajevo 20 / Piva's Mountain

Submission note. This addendum is intended to accompany, not replace, the existing Bankwatch comments. It sharpens the PECI objection around SS Brezna as the weak node, the absence of public consultation, geological and geotechnical unsuitability, lack of alternatives, lack of a credible risk assessment, and failure to demonstrate a robust long-term cost-benefit case.

Prepared by Civic Initiative "Save Brezna" and the local communities located along the Montenegro route of the 400 kV Brezna–Sarajevo transmission line

Cross-cutting Objection Applicable to Both E01 and E03: SS Brezna 400 kV as an Unproven and Unlawful Enabling Node

The central problem with both E01 Gacko–Brezna and E03 Brezna–Sarajevo / Piva's Mountain is not limited to the transmission lines themselves. The central problem is that both projects rely on SS Brezna 400 kV as a key node, endpoint and enabling hub, while the sustainability, legality, safety and suitability of that node have not been demonstrated.

This is a critical point in the present PECI process. Based on the official Energy Community documentation reviewed, SS Brezna 400 kV does not appear as a separate standalone PECI project, yet it is embedded in the current PECI logic through the interconnectors. In the 2026 public consultation, E01 is presented as a new 400 kV interconnection between Gacko and Brezna, while E03 is presented as a new 400 kV interconnection between Brezna and Sarajevo 20, including the construction of SS Piva's Mountain and, in the promoter's own project sheet, a phased configuration linked to the location of Buk Bijela. In substance, this means that the PECI process is being used to advance and legitimise a node whose own viability has not been independently proven.

That matters because the adapted TEN-E / PECI framework does not allow Projects of Energy Community Interest to be endorsed on the basis of abstract infrastructure narratives alone. The applicable Regulation requires that "the potential overall benefits of the project ... outweigh its costs, including in the longer term," and for electricity transmission projects it requires a contribution to security of supply, including "secure and reliable system operation." It also makes clear that the highest possible priority does not apply to projects that "have not reached a sufficient degree of maturity to provide a project-specific cost-benefit analysis." Where the key enabling node remains legally, geologically and socially unresolved, those conditions are not met.

The key question is not whether additional transmission can in theory enable renewable integration. The key question is whether, in this concrete corridor and at this concrete node, the projects likely to occupy that capacity are the least harmful, sufficiently mature, and publicly justifiable projects. On the present record, that has not been demonstrated. This is especially

important because the PECO framework itself requires **sensitivity analyses**, proper treatment of **interdependencies with other projects**, and comparison with **other solutions which do not require new infrastructures**. None of those requirements can be treated as marginal where both interconnectors depend on a disputed node and on a wider package of controversial, uncertain or insufficiently mature linked projects.

The legal and factual deficiencies around SS Brezna are serious. As set out in the annexes, the node was fixed many years ago without a comprehensive independent regional geological/geotechnical suitability study, without a credible risk assessment, without genuine alternatives analysis, and with **no public consultation at all** for SS Brezna itself. The baseline around the site was materially minimised in project documentation, despite the presence of a living settlement with homes, tourism activity and agricultural use. These are not side issues. They go directly to whether the PECO process is being asked to validate, through E01 and E03, a node whose own preconditions for lawful and credible development were never met.

The deficiencies are even clearer in light of the public participation standard under the adapted TEN-E / PECO framework. The Regulation requires **at least one public consultation** before the final application file is submitted, and Annex VI requires that affected stakeholders, including **landowners and citizens living in the vicinity**, be **“extensively informed and consulted at an early stage, in an inclusive manner ... and in an open and transparent manner.”** It also requires information on **alternative routes considered**. Yet the record submitted by the affected communities for the 19 February 2026 Brezna–Crkvičko Polje–Sarajevo consultation documents late notice, missing technical and environmental documentation, and the fact that CGES had already announced that an **“optimal solution, i.e. transmission line corridor”** had been selected before the supposed first scoping consultation. That is not early and open participation while options remain open.

The geological issue is equally fundamental. If the ground continues to reopen despite repeated remediation attempts, then the problem has not been solved; it has **only been temporarily covered over**. In those circumstances, it is only a matter of time and place before renewed subsidence, a sinkhole or another ground failure affects the substation, the line route or related infrastructure. For a proposed **international node linked toward Italy** through the Montenegrin transmission system and submarine cable architecture, toward Bosnia and Herzegovina, and toward wider regional flows, that is not a local inconvenience but a direct question of **location suitability, system security and critical-infrastructure resilience**. The broader EU critical-entities resilience framework and NATO resilience logic reinforce that conclusion, even though the primary legal test here remains the PECO/TEN-E and EIA framework.

For all of these reasons, the Energy Community should not allow **E01 and E03** to function as **vehicles for laundering SS Brezna** into de facto acceptance as a lawful and suitable strategic node.

If Montenegro is advancing Brezna as the key enabling node **without adequate impact and risk assessment**, with **no public consultation at all**, on the basis of a materially minimised baseline and without genuine alternatives analysis, then Montenegro is not complying with the standards that the Energy Community framework itself requires for projects seeking PECO legitimacy. The proper consequence is not endorsement, but rejection of PECO status for E01 and E03 in their present form.

E01: Construction of the new interconnection, OHL 400 kV Gacko (BA) – Brezna (ME)

1. **DISPUTED – E01 stands or falls with SS Brezna 400 kV.** The official 2026 PECE page states that E01 would connect SS Gacko (B&H) with SS Brezna (MNE), that its current phase is “Consideration phase, before prefeasibility study”, and that “EIA [is] planned in 2027”. The project is therefore both immature and dependent on SS Brezna as its enabling node. PECE status should not be granted on the assumption that this node is viable when that has not been demonstrated.
2. **DISPUTED – PECE status requires more than an abstract claim that more transmission can support renewables.** The applicable PECE framework requires that “the potential overall benefits of the project ... outweigh its costs, including in the longer term” and, for electricity transmission projects, that the project contributes to sustainability and to “security of supply, including through ... secure and reliable system operation”. It also expressly says that the highest priority does not apply to projects that “have not reached a sufficient degree of maturity to provide a project-specific cost-benefit analysis”.
3. **DISPUTED – The key question is not whether additional transmission can in theory enable renewable integration.** The key question is whether, in this concrete corridor and at this concrete node, the projects likely to occupy that capacity are the least harmful, sufficiently mature, and publicly justifiable projects. On the present record, that has not been demonstrated. The PECE framework requires each cost-benefit analysis to include “sensitivity analyses” and the relevant “interdependencies with other projects”, while also enabling comparison with “other solutions which do not require new infrastructures”.
4. **DISPUTED – SS Brezna was fixed as a 400 kV node long before the area became a densely inhabited tourism-agriculture region, and without the studies required for such a critical node.** SS Brezna was designated around fifteen years ago as a 400 kV node location without any comprehensive state-level strategic justification for that specific location, without an independent regional geological/geotechnical suitability study, without a credible risk assessment, without any public consultation at all, without a genuine alternatives analysis, and without cumulative-effects assessment for a node intended to connect a very large cluster of generation projects. In the meantime, the surrounding area became a living settlement and a rural tourism and agricultural zone.

Annex 1 - [IPAM registration](#)

5. **DISPUTED – There is no public consultation at all for SS Brezna.** This is not a minor procedural complaint. The adapted TEN-E/PECE framework requires that, where not already required at equal or higher standards under national law, the project promoter shall carry out “at least one public consultation” before submitting the final application file. That consultation must take place “at an early stage” and help identify the “most suitable location, trajectory or technology”. Annex VI further requires that affected stakeholders, including “landowners and citizens living in the vicinity”, be “extensively informed and consulted at an early stage, in an inclusive manner ... and in an open and transparent manner”. It also requires that the information leaflet cover “alternative routes considered”.

Annex 2 - [Testimonies&tourism-agriculture region - english title \(VIDEO\)](#)

Annex 1: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/case-registry/CGES-SS-Brezna.html#Request-summary>

Annex 2: <https://www.youtube.com/watch?v=AfePYapmB1k&t=56s>

6. **DISPUTED** – The baseline around SS Brezna is materially inaccurate. Our annexes show that official project documentation presented the area around SS Brezna as having no houses or business objects within 2 km, while the actual setting is a living rural settlement with homes, tourism facilities and business activity. The PECEI process cannot lawfully assess benefits, impacts, alternatives, public participation or social acceptability on the basis of a materially minimised baseline.

[Annex 3 – Project Summary Documents – Non Technical Summary NTS](#)

7. **DISPUTED** – No independent regional geological/geotechnical suitability study has been disclosed for a critical international energy node. The EIA framework incorporated into the Energy Community requires environmental assessment before consent for projects likely to have significant effects. The revised EIA approach highlights the “whole project”, reasonable alternatives, risks to human health, and the “risk of major accidents/disasters, including those caused by climate change”. A few small and questionable later studies cannot substitute for an independent, comprehensive regional geological/geotechnical study capable of answering the real question: whether this wider area is suitable at all for critical cross-border energy infrastructure and, if so, under what conditions.
8. **DISPUTED** – Repeated remediation attempts that failed to stabilise the ground point to a persistent and unpredictable hazard, not a solved technical issue. Our annexes and witness evidence indicate that CGES repeatedly attempted to remediate ground instability near the existing substation over a period of years, yet the ground repeatedly reopened. If the ground keeps reopening despite repeated remediation and concrete injection, then this is not a solved engineering problem but a persistent and unpredictable hazard. It means that the issue is not theoretical: it is only a question of time and place when a new collapse, sinkhole or further subsidence may affect the substation, the line route, or related infrastructure.

[Annex 4 – Video testimony of recent ground reopening in Brezna and evidence of recurring land instability across the wider region](#)

[Annex 5 – Written testimony by one of the oldest residents of Brezna regarding recurring ground instability in the area](#)

[Annex 6 – Corroborated Community Testimony on Geological Instability](#)

9. **DISPUTED** – The broader EU and NATO resilience logic cuts in the same direction. The European Commission’s critical-entities resilience framework treats energy as a core sector and states that the Directive aims to strengthen resilience against “natural hazards” and other threats; Member States and critical entities must carry out risk assessments and take resilience-enhancing measures. NATO’s resilience framework is built around continuity of essential services and support for the protection of critical energy infrastructure, including critical undersea infrastructure. These are not the primary legal tests under PECEI, but they are highly relevant standards for judging whether a proposed cross-border node linked to the Italy interconnector, to Bosnia and Herzegovina, and to wider regional flows has been shown to be resilient enough in the first place.
10. **DISPUTED** – No robust project-specific cost-benefit case has been shown for E01 as actually configured. There is no disclosed study showing the full scale of damage that the wider SS Brezna hub model could inflict on the local economy, tourism, agriculture, property and the survival of the community if the node is built out as planned and then used to anchor multiple new lines and associated infrastructure. On this record, the costs are not properly disclosed, the alternatives are not properly assessed, and the suitability of the location itself is not proved. For that reason, E01 should not be endorsed as a PECEI.

Annex 3: <https://www.ebrd.com/home/work-with-us/projects/psd/54749.html#customtab-c6f28c9728-item-c1e43886e6-tab>

Annex 4: <https://www.youtube.com/shorts/as57ghn3df0>

Annex 5, 6: at the end of this chapter

Source: Energy Community Secretariat, Public consultation on the 2026 candidate energy infrastructure projects (PECI), project fiche for E01 Gacko–Brezna; Regulation (EU) 2022/869 as adapted in the Energy Community framework; Energy Community overview of the EIA Directive and revised EIA framework; European Commission information on the Critical Entities Resilience Directive; NATO resilience and protection of critical energy infrastructure materials.

E03: New 400 kV interconnection between Montenegro and Bosnia and Herzegovina, 400 kV OHL Brezna–Sarajevo 20 with construction of 400/220 kV substation Piva’s Mountain

- 1. DISPUTED – E03 is not a neutral line. It is explicitly tied to SS Brezna and to the wider Piva/Buk Bijela configuration.** The official PECI page states that E03 would connect 400/110/35 kV substation Brezna with Sarajevo 20, with construction of 400/220 kV SS Piva’s Mountain. It also says the project is analysed in two phases, including Phase I with a new 400 kV OHL from SS Piva’s Mountain “to the location of Buk Bijela (BiH)” and Phase II with the line Brezna – SS Piva’s Mountain. The promoter’s own description therefore shows that E03 is not a standalone, abstract interconnection.
- 2. DISPUTED – One more 400 kV line cannot be anchored in a node whose geological and procedural viability is unresolved.** The adapted PECI framework requires that project benefits outweigh project costs in the long term and, for electricity transmission, that the project contributes to secure and reliable system operation. That standard is not met simply by declaring NTC or congestion benefits. It must also be demonstrated that the node at which those benefits are supposed to materialise is suitable, stable, resilient and lawfully justified. That has not been demonstrated for SS Brezna.
- 3. DISPUTED – The key question is not whether additional transmission can in theory enable renewable integration.** The key question is whether, in this concrete corridor and at this concrete node, the projects likely to occupy that capacity are the least harmful, sufficiently mature and publicly justifiable projects. On the present record, that has not been demonstrated. This is especially important for E03 because the project is expressly linked, in the official PECI description and in CGES planning documents, to Piva’s Mountain, the location of Buk Bijela, HPP Kruševo and the wider Brezna node.
- 4. DISPUTED – The official planning record itself links the Brezna node to Italy, Bosnia and Herzegovina, Serbia, Komarnica and Kruševo.** CGES’s Transmission System Development Plan states that the future commissioning of both poles of the HVDC link between Montenegro and Italy would further burden the Montenegrin transmission network; it also identifies 400 kV Brezna – Sarajevo 20 as a major prospective interconnection, notes that the connection towards Serbia depends on the western Serbia 400 kV buildout, states that HPP Komarnica is to connect to SS Brezna 400/110 kV, and that HPP Kruševo 120 MW is to connect to 400 kV OHL Sarajevo 20 (BA) – Brezna. In other words, the promoter’s own planning material confirms that this is not a small local asset but part of a larger cross-border and generation-enabling node with system-level implications.

Annex 1a - Extract from the Amendments to the Spatial Plan of Plužine showing planned RES and other energy facilities linked to SS Brezna as the key node

Annex 1a: at the end of this chapter

Annex 2a – Media evidence - [Save Brezna Civic Initiative Warns CGES Shareholders: An International Energy Hub in Brezna Will Lead to Disaster](#)

5. **DISPUTED** – There is no public consultation at all for SS Brezna, and the February 2026 “consultation” on the Sarajevo corridor was not compliant with the PECEI standard. The annexed written statement for the record of 19 February 2026 documents that the so-called consultation in Pluzine was announced only nine days in advance, in winter, on a working day, with no publication of the full alternatives analysis, no ESIA scoping documentation, no EMF models, no noise/corona studies, no geotechnical or landslide assessments, no cumulative impact assessment, and no precise maps of tower locations. It also states that CGES’s own notice said that an “optimal solution, i.e. transmission line corridor” had already been selected before the consultation. That is not early public participation while options are still open.

Annex 3a - [Testimonies&tourism-agriculture region - english title \(VIDEO\)](#)

Annex 4a – Media evidence: [Residents of Brezna Walked Out of the Consultations: CGES Staged a Fake Public Hearing on the Transmission Line Project](#)

6. **DISPUTED** – This is in direct conflict with the adapted PECEI/TEN-E public participation rules. The applicable framework requires at least one public consultation before the final application file, requires that the public be informed and consulted at an early stage, and requires affected stakeholders to be extensively informed and consulted in an open, transparent and inclusive manner. It also requires the information leaflet to cover alternative routes considered, likely impacts and mitigation. The annexed record goes directly to those points.
7. **DISPUTED** – The E03 corridor intensifies dependence on a geologically disputed node, which raises a system-risk issue, not just a local impact issue. The EIA framework incorporated into the Energy Community requires that likely significant impacts be assessed before consent, and the revised EIA approach highlights whole-project assessment, alternatives, risks to human health, and the expected effects deriving from the project’s vulnerability to risks of major accidents and/or disasters. If repeated remediation of ground instability has not solved the problem at or around the existing Brezna substation site, then additional dependence on that node through another 400 kV line increases, rather than resolves, system vulnerability.
8. **DISPUTED** – If the ground repeatedly reopens after repeated remediation, the risk is persistent and unpredictable. If the ground continues to reopen despite repeated remediation attempts, then the problem has not been solved; it has only been temporarily covered over. In those circumstances, it is only a matter of time and place before new subsidence, a sinkhole or another ground failure affects the substation, the line route or related infrastructure. For a proposed international energy node and connected 400 kV interconnector, that is not a marginal issue. It goes directly to location suitability, system security and critical-infrastructure resilience.

Annex 4 – [Video testimony of recent ground reopening in Brezna and evidence of recurring land instability across the wider region](#)

Annex 5 – [Written testimony by one of the oldest residents of Brezna regarding recurring ground instability in the area](#)

Annex 6 – [Corroborated Community Testimony on Geological Instability](#)

9. **DISPUTED** – The wider EU and NATO resilience logic reinforces the same conclusion. The Commission’s critical-entities resilience framework explicitly covers the energy sector and requires

Annex 2a: <https://volimpodgoricu.me/biznis/save-brezna-civic-initiative-warns-cges-shareholders-an-international-energy-hub-in-brezna-will-lead-to-disaster>

Annex 3a: <https://www.youtube.com/watch?v=AfePYapmB1k&t=56s>

Annex 4a: <https://rtcg.me/vijesti/drustvo/814758/mjestani-brezana-napustili-konsultacije-cges-fingirao-javnu-raspravu-o-projektu->

delekovoda.html?fbclid=IwY2xjawRLnWdleHRuA2FlbQlxMABicmlkETBXR2M5SHI4RWpFbW5D
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FrDzYpx3EbVGXi-M2TqCDdpZUzqikgF_aem_U5QCTQdSzPBy1R6omOm7jA

Annex 4: <https://www.youtube.com/shorts/as57ghn3df0>

Annex 5, 6: at the end of this chapter

risk assessments and resilience-enhancing measures against natural hazards and other threats. NATO's resilience and energy-security framework likewise focuses on continuity of essential services, resilient energy supplies, and protection of critical energy infrastructure, including critical undersea infrastructure. These standards reinforce the weakness of building deeper regional dependence on a node whose geological suitability and disclosed risk profile remain unproven.

10. **DISPUTED** – No robust cost-benefit case has been shown for E03 as actually configured. The PECL framework requires sensitivity analyses, interdependencies with other projects, and a methodology robust enough to compare with solutions that do not require new infrastructure. No disclosed analysis shows the real economic and social cost to the affected tourism-agriculture community, to property, to rural business activity, or to long-term community survival if the wider Brezna hub is built out and then used as the anchor for additional transmission and associated battery-storage ambitions. On the present record, E03 should not be endorsed as a PECL.

Source: Energy Community Secretariat, Public consultation on the 2026 candidate energy infrastructure projects (PECL), project fiche for E03 Brezna–Sarajevo 20 / Piva's Mountain; Regulation (EU) 2022/869 as adapted in the Energy Community framework; CGES Transmission System Development Plan of Montenegro by 2032; Written Statement for the Record submitted by the Citizens' Initiative "Spasimo Brezna" and affected local communities on 19 February 2026.

Key regulatory and standards references cited in this addendum

- Regulation (EU) 2022/869, as adapted in the Energy Community framework, especially Article 4 and Annex V/Annex VI.
- Energy Community Secretariat – Public consultation on the 2026 candidate energy infrastructure projects (PECL), including official project fiches for E01 and E03.
- CGES – Transmission System Development Plan of Montenegro by 2032.
- Energy Community – EIA Directive overview and revised EIA framework materials.
- European Commission – Critical Entities Resilience (CER) framework.
- NATO – resilience, continuity of essential services, and protection of critical energy infrastructure.

ANNEXES

Montenegrin Transmission System CGES
Podgorica

For the attention of the Executive Director, Mr Ivan Asanović

Date: 12 February 2026

Subject: Request for postponement of public consultations on 19/02/2026 and provision of complete documentation – 400 kV OHL Brezna–Crkvičko Polje–Sarajevo

Dear Sir,

On 11 February 2026 we learned by chance of the “Notice” published on 10 February 2026 on the CGES website, by which public consultations regarding the construction project of the 400 kV Brezna – Crkvičko Polje – Sarajevo transmission line were scheduled for 19 February 2026 in Plužine.

Prior to this “Notice”, none of the residents along the proposed transmission line route, who are directly affected by the project, had ever been informed about the project.

By reviewing the “Notice” published on 10 February 2026 on the websites of CGES and the Municipality of Plužine, which schedules the public consultations for 19 February 2026 at 11:00 in Plužine, we note the following:

1. The period of 9 days (of which 6 are working days), in the winter period, for a project of this size and importance, cannot be considered adequate, timely and substantive public participation.
2. The consultations are scheduled on a working day at 11:00, which in practice makes it impossible for the majority of employed citizens and property owners in the affected zones to attend.
3. The notice itself states that:
“The selection of the optimal solution, i.e. transmission line corridor, has been carried out...”
In this way, the public is invited to consultations after the key decision has already been made, which raises a serious question regarding the purpose and legality of such consultations.
4. The document that has been provided to the public represents a “short description of the project”, while:
 - the complete alternatives analysis with scoring matrices has not been published,
 - the ESIA Scoping Report has not been published,
 - EMF maps and models have not been published,
 - geotechnical and landslide assessments have not been published,
 - noise/corona effect studies have not been published,
 - maps of tower locations with precise coordinates have not been published.

5. The document uses the assumption that around 100 m is a “sufficient safety zone” for EMF and noise, without any presented modelling and measurements. Such an approach is not a substitute for the mandatory technical and health assessment.
 6. The project is financed by WBIF grant funds, within a mechanism that includes the EBRD, the EIB and the European Commission, which additionally implies high standards of early and effective participation.
-

For the reasons stated above, we request:

1. Postponement of the consultations scheduled for 19 February 2026.
2. Extension of the period for public disclosure to a minimum of 30 days.
3. Publication and provision of the complete documentation, including:
 - o the full alternatives analysis with criteria and scoring matrices,
 - o ESIA Scoping documentation,
 - o EMF modelling and exposure maps,
 - o noise and corona effect studies,
 - o geotechnical and landslide risk assessments,
 - o cumulative impact assessment,
 - o precise maps of the corridor and planned tower locations with coordinates.
4. Organisation of at least three public hearings with timely and meaningful invitation of the interested public, one in each of the directly affected zones/settlements.
5. Enabling the submission of written comments within a reasonable period after the publication of the full documentation.

We kindly ask that you provide us with a written response within 3 days of receipt of this request, via this email.

Our goal is to ensure a transparent procedure that will enable the interested public to participate in the decision-making process in an informed manner, in accordance with the laws, the Constitution and international conventions.

Sincerely,

Vesna Radojević
Coordinator
Citizens' Initiative “Spasimo Brezna”
on behalf of the affected local communities

Contact tel: +382 68 804 553

Montenegrin Transmission System AD (CGES)

Regarding the planned construction of the international 400 kV Brezna – Crkvičko Polje – Sarajevo transmission line

Public consultation – Plužine, 19 February 2026

STATEMENT FOR THE RECORD

on behalf of the Citizens' Initiative "Spasimo Brezna" and other local communities along the planned route

Dear Sir/Madam,

On behalf of the Citizens' Initiative "Spasimo Brezna" and the residents of the affected communities along the planned route of the international 400 kV Brezna – Crkvičko Polje – Sarajevo transmission line, we hereby submit this written statement for the record and for the information of all competent institutions and international partners.

1. On the manner in which this "public consultation" has been organised

We consider that the way in which today's "public consultation" has been organised is not in line with:

- the Constitution of Montenegro, which guarantees the right to a healthy environment and the right to timely and complete information on its state;
- the Aarhus Convention, which is an integral part of the Montenegrin legal order;
- the applicable laws on the environment and environmental impact assessment;
- nor with the standards of the European Union and WBIF (Western Balkans Investment Framework) regarding early, effective and inclusive public participation.

Specifically:

1. Timing and date

- The consultation notice was published on 10 February 2026, only **nine days in advance (six working days)**, for a project of exceptional size and importance – an international 400 kV transmission line with long-term consequences for people, property, the environment and the development of rural tourism.
- The consultation was scheduled for a **working day (Thursday) at 11:00**, in the middle of winter, in Plužine, even though many directly affected residents live kilometres away and face difficult and unpredictable travel conditions at this time of year.
- Such timing and scheduling in practice make it impossible for the majority of employed citizens, landowners and people engaged in tourism and agriculture to attend.

2. Lack of key documentation

The public was given access only to a **short project description**, while:

- o the full alternatives analysis (with criteria and scoring matrices) has not been published;
- o the ESIA Scoping documentation has not been published;
- o EMF models and exposure maps have not been published;
- o noise and corona effect studies have not been published;
- o geotechnical and landslide risk assessments have not been published;
- o cumulative impact assessments have not been published;
- o precise maps of the corridor and planned tower locations with coordinates have not been published.

Without these documents, citizens have no real possibility to understand the nature, scope and risks of the project, nor to provide informed comments. Public participation is thereby reduced to a mere formality.

3. Key decision already made before the consultation

In its own notice, CGES states that an “optimal solution, i.e. transmission line corridor” has already been selected. In other words, the **key decision on the routing** has effectively been taken, while today’s consultation is being held at a stage which CGES describes as the “first” step in the ESIA Scoping process, but:

- o after the “optimal” corridor has already been chosen;
- o without publication of the analyses on which that choice is based.

This is in direct contradiction with the basic principle of the Aarhus Convention and the EU EIA Directive, which require **early public participation, when all options are still open**.

4. Ignoring written requests of the local community

On 12 February 2026 we sent CGES a written request:

- o to postpone the consultation scheduled for 19 February;
- o to extend the public disclosure period to at least 30 days;
- o to publish and provide the complete project-technical and environmental/social documentation;
- o to organise additional public meetings in the directly affected villages;
- o to allow written comments to be submitted after the full documentation is published.

This letter received **no response whatsoever** until 16 February, when we sent an urgent reminder and copied the EU Delegation, the European Commission, WBIF, the Ministry of Ecology and the Environmental Protection Agency. Only then did CGES send a short email simply confirming that the 19 February consultation would go ahead, without addressing the substance of our requests.

This pattern – ignoring the local community until international institutions are involved – is deeply worrying in itself and shows a lack of respect for the principles of partnership and trust.

2. Breaches of domestic and international obligations

In our view, the manner in which these consultations have been organised is clearly in conflict with:

- the Constitution of Montenegro, which guarantees the right to a healthy environment, the right to information and the right to participate in decision-making on environmental matters and local development;
 - the Aarhus Convention (Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters), which has been ratified and has the force of law in Montenegro, and which requires:
 - timely and effective information of the public,
 - access to relevant information before decisions are taken,
 - public participation while all options are still open;
 - the laws of Montenegro in the field of environment and impact assessment, which are aligned with the EU acquis;
 - the standards of the EU and WBIF, particularly in light of the fact that the project is being prepared with WBIF grant support, within a framework that involves the EBRD, EIB and the European Commission, which implies high standards of transparency and early public participation.
-

3. Non-recognition of the legitimacy of this consultation and our requests

For all of the above reasons, we cannot regard this “public consultation” as properly conducted or legitimate in terms of the Aarhus Convention, EU law or Montenegrin legislation.

The presence of representatives of the local communities at today’s meeting, as well as the submission of this statement, does not mean that we accept that the process has been carried out in accordance with the law; on the contrary – it serves to ensure that our objections and requests are formally recorded.

We reiterate our key requests:

1. That this consultation not be treated as valid evidence of proper public participation.
2. Publication and provision of the complete project-technical and environmental/social documentation, including:
 - the full alternatives analysis with criteria and scoring matrices;
 - ESIA Scoping documentation;

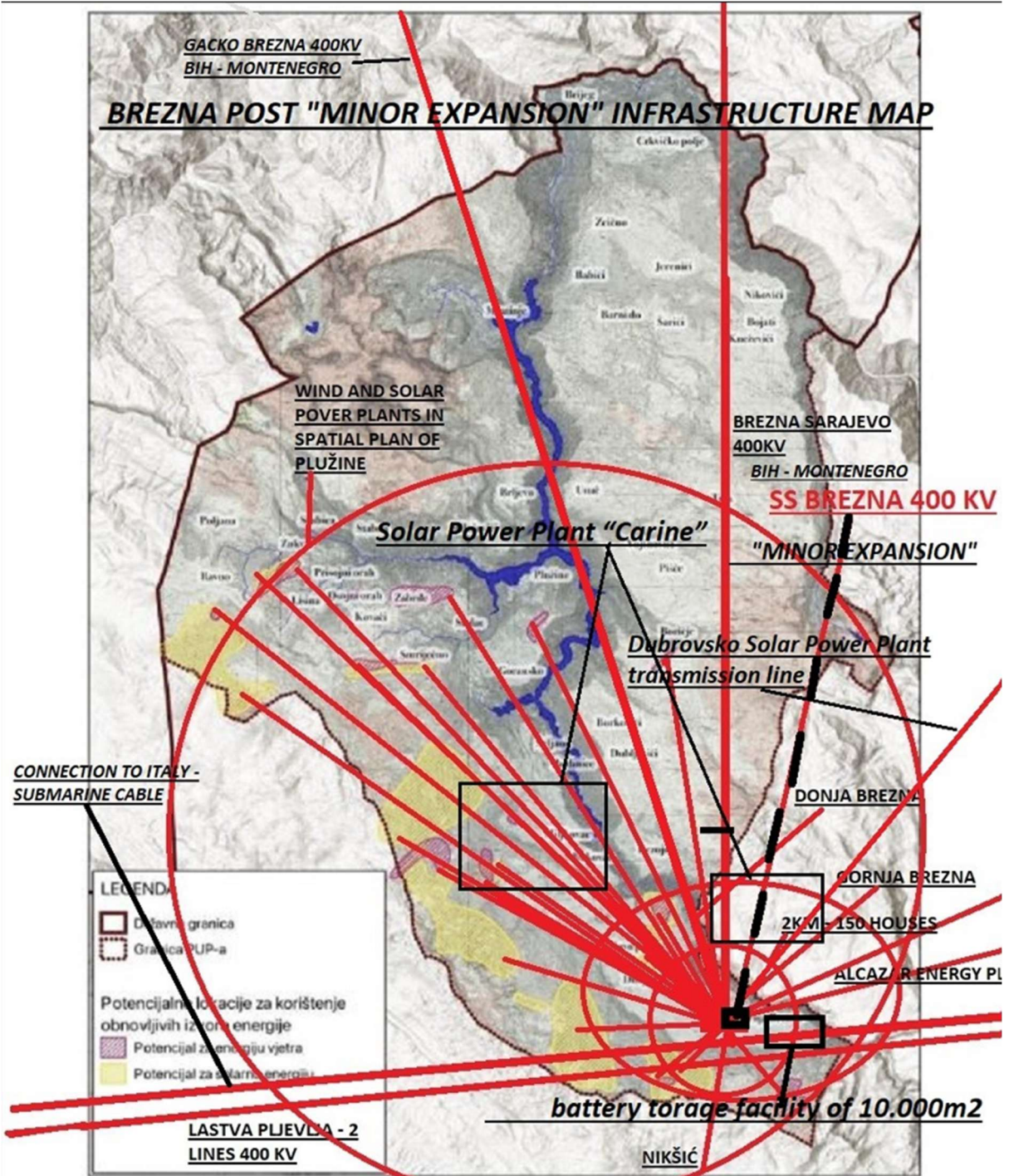
- EMF modelling and exposure maps;
 - noise and corona effect studies;
 - geotechnical and landslide risk assessments;
 - cumulative impact assessment;
 - precise maps of the corridor and planned tower locations with coordinates.
3. **Extension of the public disclosure period** to at least 30 days from the date of publication of the complete documentation.
 4. **Organisation of new public consultations** in accordance with the Aarhus Convention and domestic law, which means:
 - timely and direct notification of all residents living on or near the planned route;
 - holding meetings in directly affected villages and zones;
 - scheduling at dates and times agreed with the local communities, enabling the highest possible participation (outside strict working hours, at a time of year when travel conditions are realistically manageable).
 5. **Allowing the submission of written comments** within a reasonable period after the full documentation is published and made accessible.

Our goal is not to block development, but to ensure that decisions on the location and design of such critical infrastructure are taken transparently, in accordance with the Constitution, laws and international standards, and with genuine respect for the people who live here and who will bear the consequences of any decision taken.

We request that this written submission be **entered into the official minutes** of today's public consultation and that it be treated as an integral part of the official record regarding how public consultations for this project are being conducted.

Sincerely,

Vesna Radojević
Coordinator
Citizens' Initiative "Spasimo Brezna"
on behalf of the affected local communities along the planned route
Plužine, 19 February 2026



STATEMENT

- I, **Miodrag Šoro Radojević**, hereby declare, under full responsibility, the following facts and testimony concerning an event in which I was a direct participant.

In **July 1974**, while carrying out agricultural work on my property in **Gornja Brezna**, I experienced a serious incident. Due to the **porous and unstable ground**, while transporting hay, the soil collapsed and a fissure opened to a depth of more than **two metres**, into which one of the two oxen harnessed together fell.

At that moment, the oxen were unharnessed and were not carrying any load. While I was tying the hay with ropes, I attempted to assist by securing the ox with a rope in order to pull it out. Together with **more than 20 villagers** who had gathered to help, the ground beneath my feet suddenly gave way, and I fell into a **newly formed fissure** approximately **one to one and a half metres** deep.

On multiple occasions, as far as I can recall, ground subsidence and soil slippage have occurred at the **Poljana micro-location in Brezanski Lug**, several hundred metres from the **planned substation site**. Similar incidents have been recorded throughout the village, including at the **Zgrada and Todorovci** micro-locations, as well as within the village itself.

These ground collapses and sinkholes have reached depths ranging from **one metre up to seven or eight metres**, with diameters sometimes extending to **ten metres**.

Based on my lifelong experience and intimate knowledge of this terrain, having been born and lived here for most of my life, I firmly believe that the construction of large infrastructure facilities in this area would be **highly risky**.

I am prepared to repeat and confirm this testimony wherever required, under full legal and moral responsibility.

- In front of my house in Brezna, we had an orchard. One day, a sinkhole suddenly opened and swallowed an entire plum tree.
- In the area of Todorovac, a huge sinkhole is still visible today—approximately 6 metres in diameter and about 8 metres deep. I'm sorry that it's winter and covered in snow, so we can't take you there to see it.

Miodrag Šoro Radojević
Telephone: +382 69 590 793

STATEMENT OF DRAGO (DRAGOLJUB) RADOJEVIĆ

STATEMENT

I, **Drago Radojević**, hereby give the following statement under full moral and criminal responsibility, and I am prepared to confirm it at any time and in any place.

Upper and Lower Brezna have historically been known for rugged and geologically unstable terrain, with frequent occurrences of sinkholes, pits, and ground subsidence, posing serious danger to people, livestock, and buildings.

In this area, sudden ground collapse and the formation of sinkholes have occurred repeatedly. At multiple locations in Brezna, the ground has opened without any prior warning, endangering both human lives and property.

Oral tradition and historical records attest to numerous cases of ground collapse in Brezna. It is well known that in the past, deep pits formed in certain locations into which people, livestock, and horse-drawn carts fell.

Within my family and among local residents, many examples are known of sudden ground openings. These events also occurred in the vicinity of the present substation location.

Gornja Brezna is a karst field. The soil in Brezna is sandy and porous, covered by a thin layer of topsoil, making it susceptible to frequent tectonic disturbances and the opening of sinkholes.

I personally remember many fissures and sinkholes. Particularly large and deep ones appeared near the houses of Dragan, Milorad, Blagutin, Vojo Radojević, as well as Mirko Đurković. Over time, grassy surfaces formed inside them, making them resemble natural depressions.

Such sinkholes existed both within the village itself and in the former seasonal pasture area (katun). The largest one is located at a place called **Todorovac**, which formed approximately 30 years ago.

Together with my brother, I filled three sinkholes at a place called **Rađuša**, using approximately fifteen large trailer loads of soil.

In my brother's garden, a sinkhole opened which we filled with approximately six to seven trailer loads of soil.

Domestic animals frequently fell into holes that opened suddenly.

A third sinkhole, located beside the road leading to my house in Gornja Brezna, was filled using approximately fifty wheelbarrows of stone.

In the garden of **Boro Radojević**, there remains an unfilled hole that absorbs water during heavy rainfall; water disappears through this opening deep underground.

At the entrance to **Mirko Đurković's** house, a large hole opened beneath the sidewalk.

Numerous sinkholes and ground collapses were filled by the company that excavated soil for the foundations of the existing substation. This can be confirmed by all local residents. The locations of these former sinkholes remain visible today, as the soil differs in colour.

During the construction of roads and other structures in this area, unstable ground was frequently encountered, requiring additional works, infilling, and remediation.

All of the above indicates that the Brezna area is **extremely risky for the construction of large and heavy infrastructure facilities**, particularly those of strategic and international importance, such as the planned substation and energy hub.

Based on my lifetime experience, long-term residence, and research into the history of this area, I believe that the construction of large energy facilities in Brezna is **extremely dangerous** and carries a **high risk to the safety of people, property, and the energy system itself**.

Statement given in February 2026.

Drago Radojević

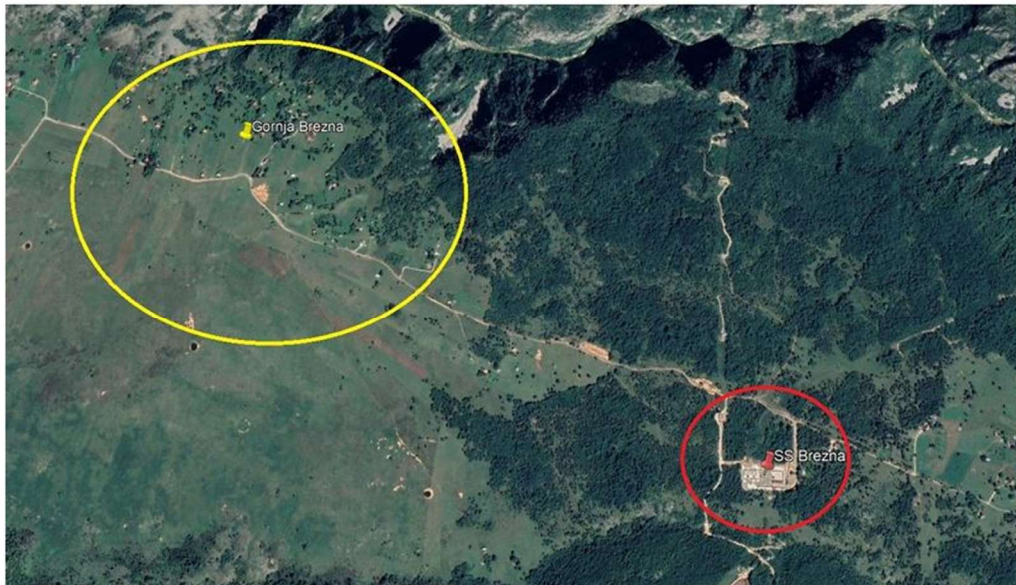
Mobile: +382 67 856 536

4 Environmental and Social Baseline Settings

SS Brezna is located in the Pluzine Municipality, which spans 854 km². It shares borders with Niksic to the west, Zabljak and Savnik to the east, and Bosnia and Herzegovina to the north. As of the 2011 census, Pluzine had a population of 3,286 in 1,140 households.

There are no residential or business facilities in the vicinity of SS Brezna. The closest settlement to the SS Brezna is Gornja Brezna (at a distance of approx. 2 km from SS Brezna) with a population of 48 inhabitants (Figure 3).

It should be noted that the only road leading to the SS Brezna is a local road branching off from the regional road E762 Pluzine-Niksic-Podgorica. This narrow local road passes through the settlements of Donja Brezna (5-7 km from the SS Brezna) and Gornja Brezna, extending all the way to the SS Brezna, making it a critical route for both local residents and visitors.





CEE Bankwatch Network input for public consultation on PECl project selection 2026

E01: Construction of the new interconnection, OHL 400 kV Gacko (BA) - Brezna (ME)

Comment:

This project did not feature as a priority in the recent [Connecta II gap analysis](#) on transmission infrastructure in the Western Balkans, raising questions about its role and urgency. While it in theory benefits the transmission grids of both countries, and the loss reduction aspect is welcome, the wider environmental and social impacts of its completion should be taken into account in the decision whether it should be selected as a PECl. The appropriate prioritisation of the linked investments should also be taken into account and whether the project – even if implemented – will end up contributing to the renewables and climate neutrality targets as planned. In this case, it is based on outdated countries' TYNDPs and is linked to some contested or even shelved projects.

In Bosnia and Herzegovina it is intended to support the integration of RES projects in East Herzegovina, however some of these projects are highly contested. Among others, it would enable the Dabar hydropower plant – part of the wider [Upper Horizons](#) project – which would have extremely serious impacts on nature and the local population, as well as on water availability and agriculture in the Federation of Bosnia and Herzegovina and the Neretva delta in Croatia.

On the Montenegrin side it will be connected to what is now a 110/35 kV substation in Brezna, currently being upgraded to 400/110/35 kV. This substation is planned to enable a direct connection to the Komarnica hydropower plant (see CGES [Transmission System Development Plan of Montenegro by 2032](#), page 71), along with multiple other RES projects. However, in 2025 the environmental assessment for the 172 MW Komarnica plant – which would have enormous impacts on biodiversity – was withdrawn, and it is unlikely the project will go ahead.

The upgrade and expansion of the substation itself is controversial. So far there has been no EIA or public consultations, although there was a [technical assistance grant from the WBIF](#) to prepare the necessary studies. The EBRD has supported the project with a loan, based on false information that there are no houses and businesses within 2 km of the project and that this is just a small expansion. The reality is that there is a thriving community in the area with multiple rural tourism capacities, and the project will serve as a hub and be connected to multiple overhead transmission lines from all directions that will disturb the locals. In addition, the necessary geological survey/study for the very unstable location is either not done or not disclosed, so the contribution to security and stability of the electricity supply is also questionable. The local community has already [contested the project within the EBRD's Independent Project Accountability Mechanism](#) and their claims are currently being assessed.

Link 1: https://connecta-info.eu/wp-content/uploads/2026/02/Gap-Analysis_Final-report-ENE-INFR-REG-RS-01.pdf

Link 2: https://bankwatch.org/wp-content/uploads/2023/12/2023_12_The-Upper-Horizons-complex-Bosnia-and-Herzegovina.pdf

Link 3: <https://cges.me/wp-content/uploads/2025/12/Development-plan-2023-2032.pdf>

Link 4: <https://www.wbif.eu/technicalassistancegrants//WB6-MNE-ENE-06>

Link 5: <https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism/case-registry/CGES-SS-Brezna.html>

Despite the benefits for the transmission grids of both countries from this project, taking into account the wider impact of the connected projects, it is questionable whether it deserves PEI status. The importance of the project for the regional network may not be as high as it appears due to the inability of the Upper Horizons complex and the Komarnica hydropower plant to effectively contribute to the energy transformation with minimal environmental and social impacts.

E03: New 400 kV interconnection between Montenegro and Bosnia and Herzegovina, 400kV overhead line Brezna-Sarajevo 20 with the construction of 400/220 kV substation Piva's mountain

Comment:

The Brezna-Sarajevo interconnection, also referred to as the Buk Bijela-Brezna interconnection by the Independent System Operator in Bosnia and Herzegovina (NOSBiH) (see [Long-term Network Development Plan 2024-2033](#), page 51) has similar issues as the Gacko-Brezna interconnection.

It is not included as a priority in the recent [Connecta II gap analysis](#), and according to the countries' TSOs plans, this line with the accompanying infrastructure should enable the direct connection of two highly controversial hydropower projects – Buk Bijela in Bosnia and Herzegovina and Kruševo in Montenegro.

The Buk Bijela project is already well known to the Energy Community secretariat through the compliance case [ECS-25/21](#). The new EIA for the project, developed as a result of the process brokered by the Energy Community Secretariat, [does not mitigate the key issues of the planned plant](#). The future of the hydropower plant is unclear due to a constitutional dispute that remains unresolved. It is also not included in the publicly available draft of Bosnia and Herzegovina's NECP.

The idea for the Kruševo hydropower plant in Montenegro has existed for a long time, but has only recently resurfaced in public discourse. Not much is known about the project, and even the capacity is unclear. It is given as 82 MW in Montenegro's NECP and as 120 MW in the transmission system development plan. The only thing that seems to be clear is that the plant is to be connected to the 400 kV Sarajevo 20 - Brezna overhead line (see CGES [Transmission System Development Plan of Montenegro by 2032](#), page 71). The siting comes with high environmental impacts as the location is part of the Dragišnica Komarnica Nature Park, recognized as a conflict zone in the Draft Spatial Plan of Montenegro till 2040 and SEA for the Plan. With this many unknowns, this project's future is uncertain, and it will certainly not be completed in the foreseeable future.

In addition, both countries' hydropower plans are unrealistically ambitious and have not taken account of the increasing climate vulnerability of hydropower in recent years, which is only expected to get worse.

The interconnection is again ending at the problematic Brezna substation, adding one more 400 kV line to an already congested area.

This project also claims loss reductions, but does not quantify them.

Similarly to the above project, taking its wider impact into account, and that of the connected projects, it seems weakly justified as a PEI.

Link 6: <https://www.nosbih.ba/files/2025/10/20251029-lat-Dugorocni-plan-razvoja-prenosne-mreze-2024-2033-Knjiga-1.pdf>

Link 7: https://connecta-info.eu/wp-content/uploads/2026/02/Gap-Analysis_Final-report-ENE-INFR-REG-RS-01.pdf

Link 8: <https://www.energy-community.org/enc-lex/cases/registry/2021/case2521BH.html>

Link 9: <https://bankwatch.org/story/don-t-look-don-t-find-buk-bijela-s-environmental-impact-assessment>

Link 10: <https://cges.me/wp-content/uploads/2025/12/Development-plan-2023-2032.pdf>