

## **Supplementary Note for the PECE Electricity Group regarding E01 and E03: active accountability and compliance context relevant to the assessment of SS Brezna as enabling node**

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**Submitted by:** the Civic Initiative “Save Brezna” and the affected local communities

**Projects concerned:** E01 – OHL 400 kV Gacko–Brezna; E03 – OHL 400 kV Brezna–Sarajevo 20 with the construction of 400/220 kV substation Piva’s Mountain

**Purpose of this note.** This supplementary note is submitted for the record before the 19 May 2026 meeting of the PECE Electricity Group. It is intended to ensure that E01 and E03 are **not assessed as neutral standalone interconnectors**, but in light of the **unresolved status of SS Brezna 400 kV** as their key enabling node.

### **1. Why this is directly relevant to the PECE assessment**

According to the official PECE documentation, SS Brezna 400 kV does not appear as a separate standalone PECE project, yet it is embedded in the present PECE logic as the key node, endpoint and enabling hub for both E01 and E03.

This is important because the adapted TEN-E / PECE framework requires that the potential overall benefits of a project outweigh its costs, including in the longer term, and for electricity transmission projects requires a contribution to security of supply through secure and reliable system operation.

The key question is therefore 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.

### **2. Active accountability and compliance context**

The **EBRD-IPAM** case concerning SS Brezna has now entered the **Compliance phase**. This is **highly relevant** here because that phase will examine whether EBRD complied with applicable environmental, social and disclosure standards in relation to the project, including issues that go directly to the lawfulness, credibility and acceptability of SS Brezna as the location and enabling node on which E01 and E03 depend.

There are also **ongoing integrity and accountability concerns before EBRD mechanisms** in relation to **SS Brezna**. We do not ask the PECE Group to resolve those processes. We ask only that the Group not treat SS Brezna as a settled, uncontested and proven assumption while those core issues remain active and unresolved.

### 3. Core unresolved issues affecting SS Brezna as enabling node

- SS Brezna is being advanced as a **key node without independent and comprehensive geotechnical suitability study capable of determining whether a node of this scale can be built at this location at all.**

The issue is not the existence of limited, localised geotechnical works, but the **absence of an independent and comprehensive regional geotechnical study.**

- For SS Brezna there was **no public consultation at all.**
- The project documentation **concealed the existence of homes, residents and business activity altogether..**
- **No alternatives analysis has ever been demonstrated** for SS Brezna as the location of a 400 kV international energy hub.
- The local record indicates **repeated ground instability and repeated remediation attempts that did not solve the problem.** If the ground continues to reopen despite repeated remediation, then the risk is not solved but persistent and unpredictable.

### 4. Why this matters for the 19 May meeting

If E01 and E03 depend on SS Brezna as their anchor node, then unresolved issues concerning node viability, public participation, alternatives, baseline credibility and risk assessment are directly relevant to project maturity, to the credibility of the cost-benefit analyses, and to the final recommendation on PECI eligibility.

In these circumstances, proceeding as if SS Brezna were already an accepted and proven node would risk using E01 and E03 to legitimise, indirectly and prematurely, a location whose own sustainability, legality and suitability remain under active review and dispute.

### 5. Requested procedural handling

- Please place this note on the official record of the PECI process for E01 and E03.
- Please circulate it to PECI Electricity Group members and to EIHP as material relevant to the assessment of those projects.
- Please **invite the project promoters, at the 19 May 2026 meeting, to address specifically:**
  - (i) the status of SS Brezna 400kV as **enabling node;**
  - (ii) whether any **independent and comprehensive geotechnical suitability study exists;** Not just **limited, localised geotechnical works**
  - (iii) **what public consultations, if any, were ever held for SS Brezna itself;**
  - (iv) **what alternatives were genuinely assessed;** and

(v) how the *active IPAM Compliance process is being taken into account.*

- If no clear, complete and credible explanation is provided, we **respectfully submit that E01 and E03 should not be proposed for inclusion on the PECE list at this stage.**

**Civic Initiative “Save Brezna”**

on behalf of the affected local communities