

Dear UNDP,

We are writing to you with deep concern over the present situation with the restoration of the River Sateska in the Ohrid Region of the Republic of Macedonia, a UNDP project (00117018), which is currently being implemented.

Although rediverting the river to its original path is well-conceived and necessary, it is being conducted with an extremely substandard environmental impact assessment (attached, Macedonian language only).

Shortfalls include

- a severe lack of study of aquatic life in the river with the exception of amphibians, reptiles and riverside plants;
- climate and numerous other data that appears to be out of date and climate change modelling from 2008;
- little to no analysis of groundwaters;
- little to no analysis of the species-impact of a sediment-collecting dam that will be placed on the river;
- little to no analysis of the impact that the rerouted river will have on the River Black Drim;
- little to no analysis of the natural sediment and organic debris flow that may be required for optimized ecosystems downstream of the dam;
- little to no analysis of the impact to Lake Ohrid of the sudden removal of a decades-old inflow (albeit a polluting and unnatural one);
- conclusions that there will be no impact on soils during the operational phase, despite the moving of a river; and
- no establishment of reference/desired conditions.

These deficiencies are summarized in the attached document authored by Ohrid SOS. In addition,

- significant parts of the environmental impact assessment seem to have been copied from other assessments or documents, often without clear or explained relevance; and
- comments submitted by Ohrid SOS as part of a public consultation procedure have disappeared with Macedonia's Ministry of Environment and Physical Planning claiming not to have received them.

Of equal concern, requests for information about the project by the Commission for the Management of the Natural and Cultural Heritage of the Ohrid Region -- a body designed to act as a control mechanism to prevent damage to the Outstanding Universal Value of the Ohrid Region World Heritage Site where the Sateska is located -- have gone unanswered.

The Commission has therefore not been able to issue an opinion about the project, which, aside from constituting a best practice approach, appears to be required under the Law on Management of the Natural and Cultural Heritage of the Ohrid Region.

We reiterate that we absolutely support the rerouting of the Sateska in principle. However, it must be carried out to the highest environmental and ecological standards with the intention of delivering a healthy river, not simply to tick boxes for UNESCO. In any case, UNESCO's 2020 Reactive Monitoring Mission Recommendation 7.e for the river's complete restoration cannot be reliably achieved or measured with the present approach.

Please look into this matter immediately and inform us of how it can be resolved for the best outcome for both Lake Ohrid and the River Sateska itself.