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GENERAL REMARKS BY NGO MANS ON THE DRAFT AMENDMENTS TO THE SPATIAL-URBAN PLAN OF THE MUNICIPALITY OF PLJEVLJA

- **Although it is a legal obligation, the Draft Amendments to the Spatial-Urban Plan of Pljevlja does not define the limit and scope of the planned amendments.**

The proposed Draft Amendments specify that the amendments relate to the area that includes the certified coal reserves of the Pljevlja Basin, additionally explored part of the coal reserves of the Ljuće-Šumanski basin and the exploration-exploitation area of the Glisnica coal bearing, while the scope of the procedure will be defined by the Plan Subject.

Such decision is not in accordance with the legal obligation that the limits and the scope of the planning document must be proposed. Also, during the public debate, it is completely unacceptable for the citizens of Pljevlja to be denied the possibility to find out where the mining activities and the opening of new mines are planned, as this may have an impact on their lives, especially due to possible displacements.

- **Draft Amendments to the Spatial-Urban Plan of Pljevlja is an incomplete document, since it does not contain any data showing the state of the explored reserves and their economic viability.**

The proposed Draft Amendments to the Spatial-Urban Plan of Pljevlja foresees that the future exploitation of coal will be at the bearings: Kalušići, Grevo, Rabilje and Komini, as part of the Pljevlja coal basin, then in the area of Ljuće-Šumanski basin in the part that was not affected by the previous mining activity, as well as in the area of Glisnica coal bearing.

Regarding the area of Ljuće-Šumanski basin, the proposed Draft specifies that a part of the basins has been geologically explored and economically significant reserves have been confirmed, while for the rest, geological research and consideration of the economic feasibility of the exploitation of the entire belt are yet to be done. When it comes to the area of Glisnica coal bearing, it is pointed out that after the geological survey, economically significant coal reserves have been confirmed and certified, while the technical documentation and the opening of the bearing are to be prepared.

However, such general formulations and claims are not accompanied by any data showing the actual state of coal reserves and their quality, i.e. economic viability, which is completely unacceptable, and raises the question of whether research on the quantities and the quality of potential coal reserves has been really made recently.

Regarding the aforementioned, it should be emphasized that the previous state planning documents, such as the Energy Development Strategy, warned that the economic viability of the individual bearings, which are now being planned for opening, is questionable. Thus, Grevo bearing is loaded with an external landfill for the purpose of disposing of the excavation from the surface mine Potrlica, Komini bearing is overcrowded with individual housing construction and industrial facilities, while Rabitlje bearing, from the aspect of technical and economic conditions, is unfavourable for surface and underground coal exploitation.

- **Draft Amendments to the Spatial-Urban Plan of Pljevlja does not contain an economic analysis of the investments planned in the area subject to amendments, although it is a legal obligation.**

The Draft Amendments to the Spatial-Urban Plan of Pljevlja envisage a large number of investments, such as restoring the river flow of the Čehotina River to its natural course, reducing the level of Borovičko Lake, moving the pipeline from Brana Otilovići to the Thermal Power Plant Pljevlja, building new technological roads, the coal transportation system.

Although such investments would cost tens of millions of Euros, the authors of the proposed document do not state what is the investment estimate, or show an economic-demographic analysis that should show real economic benefits for the local community, and that is precisely the obligation according to the legal regulations.

- **Authors of the Draft Amendments to the Spatial-Urban Plan of Pljevlja did not confirm the projection of the positive impact of the project on the economy and employment growth.**

The draft document merely states that the investment activities will lead to a positive impact on the economy of Pljevlja and Montenegro, providing of a better economic environment, improvement of the quality of life and the growth of Gross Domestic Product, as well as the overall increase in the number of jobs in the mining complex due to increased exploitation, and the energy complex of the Thermal Power Plant Pljevlja, through the reconstruction of the existing and the construction of a new block of the Thermal Power Plant.

Such projections are not supported by economic calculations and, as such, are extremely questionable. This especially when considering that the Project for Construction of the Second Block of the Thermal Power Plant is uncertain and that Electric Power Company of Montenegro (EPCG), as the owner of the project, has turned to the reconstruction of the existing First Block. In addition, earlier studies commissioned for the needs of EPCG have shown that there will not be an increase in the number of jobs, especially in the Thermal Power Plant, as it is about new technologies that do not require more employees.

- **It is unacceptable that the Draft Amendments to the Spatial-Urban Plan of Pljevlja do not contain any assessment of the necessary costs of re-cultivation of the land that will be degraded.**

In the document that is at the public debate, it is stated in several places that the Pljevlja basin area is devastated due to mining, electricity production and industry, which are concentrated in a relatively small and closed area, and thus have caused population concentration, which additionally adversely influences the

natural environment. It is pointed out that the areas in the Pljevlja basin are exposed to extensive negative changes.

Despite the fact that the Draft Amendments to the Spatial-Urban Plan of Pljevlja foresee a new mining activity in areas where the Coal Mine Pljevlja has the right to concessions, the authors do not state how much the land re-cultivation would cost, which is mandatory after completion of the exploitation on individual bearings. This makes the mentioned document legally flawed.

- **It is unclear based on what it is estimated that there will be no risk to human health and the environment, when no study has been conducted on the state of health of citizens of Pljevlja and the impact of existing plants on the environment, or on the future plants.**

The Draft Amendments to the Spatial-Urban Plan of Pljevlja highlights the large scale of negative impact of the existing mining and energy facilities on human health and the environment. It is thus indicated that waste materials produced as a result of the exploitation of coal, wood, clay, marl, electricity generation, cause increased pollution of air, surface and ground waters, degradation and pollution of the land, accumulation of municipal and hazardous waste, deterioration of the health status of the population, destruction of flora and fauna.

Despite such allegations, the authors estimate that there will be no risk to human health and the environment during the start of mining production at the planned new locations, although, on the other hand, they do not refer to any analysis, study, and the like, which would really confirm this.

- **Draft Amendments to the Spatial-Urban Plan of Pljevlja are based on unfounded data when it comes to the estimate that these new projects will solve the problem of pollution of air and environment of Pljevlja.**

The document projects that one of the positive outcomes of the planned changes will be the solving of the key issues of air and environmental pollution of Pljevlja in the heating season, through the implementation of the city heating with the Second Block of Thermal Power Plant as the base heat source.

However, such projection was not confirmed by any official document, especially when considering that EPCG, as the owner of the existing Thermal Power Plant in Pljevlja, turned to its ecological reconstruction and in the past year or two has not taken any effective steps regarding the Second Block Project.