

The position of the European small hydropower sector

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General position

ESHA represents the official position of SHP in Europe.

ESHA consequently aims at a harmonisation between exploitation of SHP and ecological restrictions.

ESHA consequently resists prohibitive policy against SHP.

ESHA supports the European targets for renewable energy.



Remarks on „hydromorphology“

The term „hydromorphological alteration“ is not defined in the Water Framework Directive.

Any definition has to set benchmark values for selected criteria.



Impacts on HMWB from the SHP's point of view and well known mitigation measures

Back water areas

river restructuring techniques

Interruption of river
continuum at weirs

fish bypass systems

Diversion reaches

residual flow



No Impacts on HMWB from the SHP's point of view

Bed load transport and sedimentation

Discharge regime due to storage

Peak operation



The question of costs

SHP operators are willing to set measures mitigating hydromorphological alteration

In reality that means additional costs

Additional investment cost

Additional operation cost

Reduced energy production

Any common strategy has to address the cost issue (methods on how to calculate and funding)



Summary

The implementation of the WFD must not oppose to the targets of the RES-electricity Directive which is also an environmental Directive.

The SHP sector is not in principal aiming at a designation as a HMWB.

ESHA offers any kind of fair and factual cooperation in developing future tools on how to overcome conflicts.



For example:

The WFD contains within a stepwise procedure a couple of criteria to designate rivers as heavily modified.

...significant adverse effects on the wider environment.

...significant adverse effects on activities such as HP

...technical feasible...

...significantly better environmental option

...disproportionately expensive...

These criteria have to be defined precisely.
A working group in ESHA is preparing a proposal on that.

European workshop: Water Framework Directive & Hydromorphology

17 – 19 October 2005, Prague



Thank you !