

To:

Janez Kopač, Director, Energy Community Secretariat

CC:

Olivér Várhelyi, EU Commissioner for Neighbourhood and Enlargement Negotiations

Virginijus Sinkevičius, EU Commissioner for Environment

Kadri Simon, EU Commissioner for Energy

Concerns over Montenegro's non-compliance with opt-out provision for the Pljevlja power plant

Dear Director Janez Kopač,

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL has been working for clean air and healthy energy in the Western Balkans region for several years now.

HEAL, Eco-Team Montenegro, Green Home Montenegro, and Sustainable Energy would like to express our greatest concerns about what we consider non-compliance of the opt-out provision as defined in the *Decision no. 2016/19/MC-ENC of the Ministerial Council of the Energy Community*¹, for the thermal power plant Pljevlja, Montenegro.

According to the recent "Energy Community Secretariat's WB6 Energy Transition Tracker 02/2021", the allowed 20,000 operating hours for the Pljevlja plant have been used up.

A continuation of the operation of Pljevlja would mean the Montenegrin government not respecting the Treaty obligations, and would result in continuous high pollution and unnecessary health impacts for an unspecified time.

Air pollution from the Pljevlja coal power plants at large impacts people in the European Union: as the pollution knows no borders, 52% of the health impacts occur in the European Union, 32% in the Western Balkans and 15% in other countries. This means up to 133 premature deaths annually from the current plant's emissions. Further health impacts include 285 cases of bronchitis in children, 2,894 asthma symptom days in asthmatic children, 68 chronic bronchitis in adults, 106 hospital admissions due to respiratory or cardiovascular symptoms, 478 minor restricted activity day, 204,449 restricted activity days and 39,686 work

¹ [Decision no. 2016/19/MC-ENC of the Ministerial Council of the Energy Community](#)

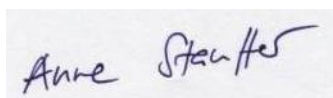
days lost in the working age population. The Pljevlja power plant alone is responsible for annual health costs of up to 3,03 million EUR².

Regrettably, energy policy decision makers in the region continue to disregard the huge health burden from coal power generation, and seem to consider the necessary energy transition away from fossil fuels towards renewables as a threat, rather than as the way forward for health, environmental and economic sustainability in the medium and long-term.

To protect people's health in European region, HEAL, Eco-Team Montenegro, Green Home Montenegro, and Sustainable Energy would like to underline the importance of full compliance with Decision no. 2016/19/MC-ENC of the Ministerial Council of the Energy Community, by all contracting Parties, without any exemptions.

We call on you to look into this issue with priority and declare Montenegro non-compliant with the Treaty.

Sincerely,



Anne Stauffer
Director for Strategy and Campaigns
Health and Environment Alliance (HEAL)

On behalf of signatories:

(1) ECO-TEAM MONTENEGRO

(2) GREEN HOME MONTENEGRO

(3) SUSTAINABLE ENERGY



The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

HEAL's EU Transparency Register Number: 00723343929-96

² Report : [Chronic Coal Pollution](#)