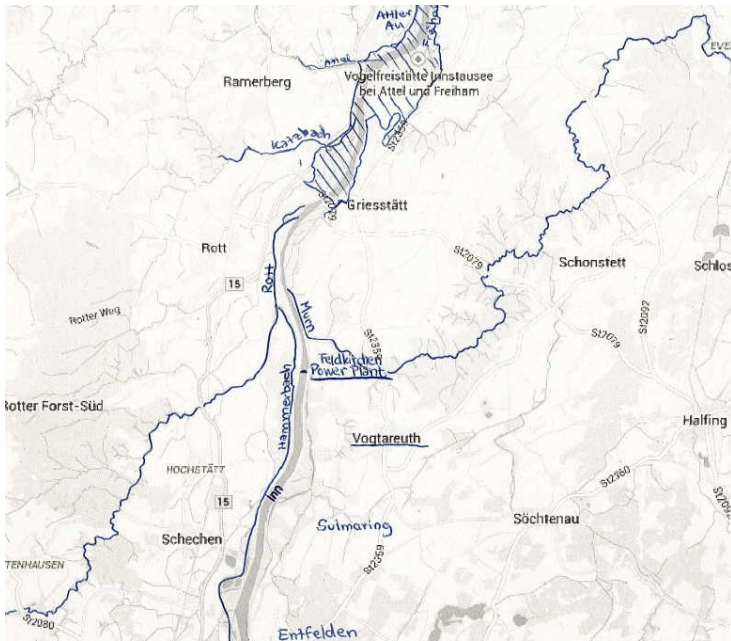


Feldkirchen Run-of-River Power Plant

- Decision and background information -

Background – Feldkirchen Hydro power plant



The Feldkirchen power plant in Bavaria, is operated by VERBUND Innkraftwerke GmbH. Its capacity is 38 MW (More than 200.000 MWh per year). It is one of the many hydropower plants on the Inn, a tributary of the Danube.

In September 2014, Polarstern, a 100% green German supplier informed us that they are interested in selling EKOenergy, and that their EKOenergy would come from this power plant.

In the reports of the International Commission for the Protection of the Danube River, the river Inn is described as one of the most transformed parts of the river basin. The chemical situation of the river is ok, but there is influence of intensive agriculture. The Inn is not considered as a priority area for river restoration measures.

On the website of Polarstern, following description is given of the power plant:

Polarstern buys electricity for its customers in a decentralized hydropower plant, the Innkraftwerk Feldkirchen. The plant has modern turbines with optimum energy yield and also fulfils high environmental standards: for example, fish ladders guarantee a free passage for trout, Danube salmon and grayling. Shore protection measures that create new habitat for water birds, frogs and butterflies. In the production of green electricity, there are no harmful CO2 emissions. This is confirmed by the TÜV Nord and the renowned Grüner Strom Gold label. Compared to a modern coal-fired power plant, the Feldkirchen power plant prevents some 165,000 tons of CO₂ per year.

Public consultation and comments

Between the end of October and the beginning of December 2015, we organised a public consultation about the Feldkirchen hydropower plant.

The public consultation was announced at our website.

We also actively asked for comments from WWF, DNR, Grüne Liga, NABU, GNF, NABU Bayern, BUND, BUND Bayern, Kreisgruppe BUND Rosenheim, Orstgruppe Rott am Inn, Lehrstuhl für Hydrologie und Flussgebietsmanagement TU München, WWF - Abteilung Naturschutz, Wasserwirtschaftsamt Rosenheim, Kreisfischereiverein Rosenheim, Ref III Landesfischereiverband Bayern, Bayerische Elektrizitätswerke, Bayerische Flussallianzen, Fischereifachberatung Bezirk Oberbayern, "Bezirksfischereiverein Mühldorf - Altötting e.V.", KfV Wasserburg am Inn e.V., German Ministry for environment, River Basin Management Expert Group of the International

Commission for the Protection of the Danube River (icpdr), International Commission for the Protection of the Danube River (icpdr), as well as from neighbours.

We got very few specific reactions. Several people told they don't know the area well enough to comment. The contact person of the Bavarian Agency for Fishery and Water confirmed that the power plant has a fish passage and several measures have been taken to restore and protect fish populations in the Inn. Apparently the has also been appreciated by local organisations of sportfishermen.

From the Project leader for "Strukturierungsmaßnahmen" at *VERBUND* Innkraftwerke GmbH, we got a lot of detailed information about ongoing and planned restoration and improvement measures on the Inn.

We got negative reactions from a neighbour of the power plant. He complains about the drastic impact of the many hydropower installations on the morphology and the ecosystems of the Inn. Natural dynamics have gone, and there are a lot of problems with sedimentation. This has drastically changed the habitats along the river, and is also creates huge risks (high water and flooding). He considers the fish passage as useless, because it doesn't prevent the sedimentation. And the sedimentation prevents its proper functioning.

He confirms that stakeholders (in particular Verbund) have recently shown some willingness to take extra measures. But he is convinced much more could be done. He suggests e.g. the connection of several branches of the river and of surrounding wetlands by the removal of sedimentation.

In a counterreaction Verbund tells that many of these claims are not supported by the data of experts. E.g. the Fish passage has only recently been built and the first monitoring is still ongoing.

Decision

(28 February 2015)

EKOenergy Licensees can sell the electricity from the Feldkirchen power plant as EKOenergy. This decision is valid until 1 March 2020.

Reasoning:

- Under German legislation, electricity cannot be marketed as renewable electricity if its production is subsidised. This makes it difficult to sell "wind energy" or "solar energy" in Germany. (This will change, as the oldest wind installations are now little by little dropping out of the support scheme). As a result, selling hydropower is one of the few options.

- We appreciate the willingness of Polarstern to experiment with EKOenergy in Germany and we want to go for it with them.

- We are not in a position (yet) to take a position in the discussion about the ecological status of the Inn. Rather, we consider the hydropower on the Inn, and the problems it is bringing with it, as interesting challenges. We want to continue to follow up the situation, not from the sideline, but as an involved stakeholder. We particularly want to see if, how and to what extent we can play a positive role in the ongoing dynamics. E.g. via the exchange of experiences, via the contributions of our fund, or by developing new projects (the latter is only realistic if EKOenergy breaks through in Germany).

- We aim at continuing our interaction with other stakeholders and in particular with the neighbour who has given us a lot of practical information. We will in each case remain very open for input, ideas and suggestions.

Follow up:

The contributions to EKOenergy's Environmental Fund, resulting from the sales of EKOenergy in Germany COULD be used for

- Small scale projects around the power plant to diminish the impact of the sedimentation. Such as suggested by the neighbour, but to follow up in cooperation with the public authorities in charge of this.
- Restoration measures in the Innauen und Leitenwälder (DE7939-301) or in Vogelfreistätte Innstausee bei Attel & Freiham, but only if this can happen in cooperation with ongoing projects, preferably projects of the local nature conservation organisations. Based on current feedback, measures in the Innauen und Leitenwälder (DE7939-301) would have the most impact.
- To support the network of nature protection areas of the Bavarian nature conservation, www.lbv.de/unsere-arbeit/unsere-schutzgebiete/schutzgebietskarte/