

[REDACTED]

An das Amt der Tiroler Landesregierung
Rechtliche Angelegenheiten Abteilung Umweltschutz
z.Hd. Dr. Katharina Somavilla
Eduard-Wallnöfer-Platz 3 A-6020 Innsbruck

BETREFF: TIWAG – Tiroler Wasserkraft AG, Antrag auf Genehmigung für die Errichtung und den Betrieb des Vorhabens „Ausbau Kraftwerk Kaunertal“ nach dem UVP-G 2000; Kundmachung der Tiroler Landesregierung vom 14.07.2025, GZ: U-UVP-6/9/180-2025

[REDACTED]

Dear Sir/Madam

[REDACTED] is an international NGO that works to provide nature positive actions on behalf of its membership. The latter consists of businesses active in the outdoor sector within Europe, and currently contains around [100 companies](#).

[REDACTED] uses fees paid by its membership to grant on-the-ground projects to conserve and restore ecosystems across the world. It manages the selection of projects, reporting, and financial transactions. Currently managing around 45 projects (with an average duration of 3 years), it has so far managed a total of 205 projects across 60 countries.

Part of [REDACTED] role is to speak on nature related issues in the best interest of its business, it is in this capacity that it is commenting on this EIA.

[REDACTED] has the following concerns regarding the proposed development.

The loss of the Alpine Wetland and Fen within Platzertal (part of only 1% of intact Wetlands in Austria) will have; direct biodiversity impacts, carbon storage impacts, and water resilience impacts.

Ongoing climate change causing medium and long term reductions in both snowpack and glacier volume means wetlands will play an increasingly important role in upland water storage and water resilience. Wetland conservation and preservation is a key tenant of the EU Water Resilience strategy and the proposed development is in clear conflict with this. Water resilience is vital for our members supply chains and their consumers way of life, as such the proposed development poses clear physical risks to their business's future viability.

Development and destruction of alpine areas risks increasingly depleting the available area for tourism in predominately wild areas. Our members businesses in the outdoor sector are important for both the European and Austrian economy and their sector relies on ever decreasing areas of

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wilderness or near wild places for either direct experience of, or an aspirational desire to experience by their consumer market. The Austrian Alps has a positive draw for visitors positively impacting the Austrian economy, and the proposed development threatens this through both its direct impacts and through the message it sends regarding the attitude of the Austrian state to protection of these iconic areas. As such this development poses physical and transitional risks to our members business viability.

It is the view of [REDACTED] speaking in the best interest of our business members that this development should not proceed.

Yours Faithfully

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