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Concerns Regarding Environmental, Agricultural, and Market Impacts of the Proposed Poultry Processing Mega-Complex in Croatia

A wave of industrial facilities for breeding, slaughtering and processing chicken is planned in the Sisak-Moslavina County in Croatia– at least 20 interconnected megaprojects.

Two Ukrainian investors, *Premium Chicken Company* (PCC) <https://premium-chicken.hr/en> and MHP group <https://mhp.com.ua/en/pro-kompaniu>, are requesting separate permits for what seems to be a series of interconnected projects, in the words of one of the investors, a “vertically integrated chicken meat production and processing system”. In our opinion the motivation behind this approach is an attempt to avoid a cumulative assessment of the impacts on the environment, human health, infrastructure and the local economy.

PCC plans to implement 9 projects of farms, slaughterhouses, an animal food factory and a chicken hatchery, and MHP plans to implement 11 projects of farms, slaughterhouses and an animal food factory. In the text below, all locations and capacities of both investors are listed in detail.

Based on the wording of the Croatian EIA Regulation, which together with the Environment Protection Act is a part of the implementing legislation of the Environmental Impact Assessment (EIA) Directive, an environmental impact assessment study needs to assess the cumulative impacts of the existing and (already) permitted projects. However, if narrowly interpreted, a common practice of the Croatian competent Ministry, these assessments, given that they are conducted in parallel, will not take into account each other's impacts. This practice in its entirety circumvents a wide scope and a broad purpose of the EIA Directive

and contravenes the long established ECJ case law concerning the assessment of the cumulative effect of projects.

In addition, the spatial plan changes of the Sisak-Moslavina county, which were to enable the planned projects, have not yet been put in force. Strategic Environmental Assessment (SEA) of these spatial plan changes have not yet been finished, in contradiction to the obligation to conduct the SEA in advance of the spatial plan changes. This raises serious concerns about the manner in which many EIA procedures have at all been initiated, knowing that they need to be in line with the spatial plans.

The poultry production capacities are planned on an industrial scale which would supersede by 4 times the total current poultry production in Croatia (source - Croatian Chamber of Agriculture: <https://komora.hr/hrvatski-peradari-zatrazili-pomoc-eu-parlamenta-i-europske-komisije-u-zastiti-od-mega-ukrajinskih-investicija-u-hrvatski-peradarski-sektor/>).

This raises serious concerns about disproportionate industrial concentration and the distortion of the market.

According to available data, the plan includes:

- a mega-slaughterhouse with a biogas plant in Sisak
- a chicken hatchery with a capacity of 120,000,000 chickens per year
- 12 farms with a total capacity of 88 million in Sisačko- moslavačka County, and one in the neighboring County (Ivanić Grad) with a capacity of 3,6 million. In total 13 projects with the capacity of 103 million chickens per year (four times more than the current poultry farming in the whole of Croatia)
- 3 slaughterhouses with a total capacity of 270 million chicken per year and animal feed factories.
- 2 Animal food factories a total capacity of 500 000 tons per year

Environmental impact assessment reports for projects undergoing environmental impact assessments are superficial, without clear solutions for key risks such as

the disposal of manure and dead chickens, but with obvious avoidance of legal thresholds in order to circumvent stricter regulations.

Citizens warn that their complaints are systematically ignored, and public consultations are reduced to a formality. Although they have clearly expressed their opposition through protests and petitions and comments during public discussions, their suggestions and comments are systematically ignored. Despite all this, the institutions remain silent and shift responsibility from one to another.

All 20 of these projects have been assessed by the Ministry of Environmental Protection and Green Transition as not having to undergo an Appropriateness Assessment as they are not expected to have significant negative impact on the Natura 2000 protected areas and species. Some of these projects are only 35 and 90 meters away from the protected Lonjsko Polje Nature Park and the protected Sunjsko Polje landscape.

The environmental impact assessment (EIA) process is currently underway for 5 projects. For one of these the draft decision has been published with the finding that there will be no adverse environmental effects, and for this one we have submitted our written comments. For the project of a slaughterhouse with a biogas plant in Sisak, the advisory expert committee gave a positive opinion during the EIA procedure, even though we and the local community wrote to the Ministry several times claiming that the project was not in accordance with the spatial plans of the city of Sisak and the Sisak-Moslavina county. A claim which was confirmed by the city of Sisak and the Sisak-Moslavina County.

Demands from civil society organizations and civic initiatives to stop harmful projects of megafarms and mega chicken slaughterhouses in Sisačko-moslavačka County:

1. Suspension of all environmental impact assessment procedures in order to make an integral overall assessment of all projects which are part of the “vertically integrated production and processing system”;
2. Review of all positive EIA permits issued thus far;
3. Review of all findings that an appropriateness assessment is not needed;
4. Conducting a Strategic Environmental Assessment which would include the whole area of the planned intervention in order to assess the cumulative impact on the environment, the ecological network, human health and the economy;
5. Ceasing all support for these projects by the state and other authorities
6. Adoption of a national decision classifying such projects as unacceptable

The activities, demands and protests so far have been supported by 79 NGOs and civic initiatives from Croatia.

Below is a list of projects, with locations and their capacities, that have been deemed by the competent Ministry of Environmental Protection as not having to undergo Appropriateness Assessment.

- Farms -

1. Lekenik -PCC - 2 farms each with 12 poultry houses (each poultry house 50,400 chickens per cycle per poultry house 6.5 cycles) - total 7.8 million per year - no EIA procedure initiated

2. Velika Ludina - PCC - 8 farms each with 12 poultry houses (each poultry house 50,400 chickens per cycle per poultry house 6.5 cycles) - Total 31.5 million per year - EIA procedure ongoing

3. Sunja - PCC - 4 farms each with 12 poultry houses (each poultry house 50,400 chickens per cycle per poultry house 6.5 cycles) - Total 15.7 million per year - EIA procedure ongoing

4. Popovača potok 3- MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry houses (each poultry house 55,821 per cycle - (our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year, 3.6 million per year - no EIA procedure initiated

5. Popovača potok 2- MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry houses (each poultry house 55,821 per cycle - (our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year, 3.6 million per year - no EIA procedure initiated

6. Popovača potok 1- MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry houses (each poultry house 55,821 per cycle - o our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year, 3.6 million per year - no EIA procedure initiated

Popovača total 10.8 million chickens per year

7. Martinska Ves Mahovo 3 - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry

houses (each poultry farm 55,821 per cycle – (it doesn't say how many cycles) - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year 3.6 million per year - no EIA procedure initiated

8. Martinska Ves Mahovo 4 - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry farms (each poultry farm 55,821 per cycle – (it doesn't say how many cycles) - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year 3.6 million per year - no EIA procedure initiated

9. Martinska Ves Mahovo 2 - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry farms (each poultry farm 55,821 per cycle – (it doesn't say how many cycles) - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year 3.6 million per year - no EIA procedure initiated

10. Martinska Ves Mahovo 1 - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry farms (each poultry farm 55,821 per cycle – (it doesn't say how many cycles) - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year, 3.6 million per year - no EIA procedure initiated

Martinska Ves total 15.4 million chickens per year

11 Petrinja - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry houses (each poultry house 55,821 per cycle - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year, 3.6 million per year - Decision made that it is environmentally acceptable and published on 18. 04. 2025 on the Ministry's website

12. Letovanić - Chicken farm - MHP (Perutnina Ptuj/Pipo) - 1 farm 10 poultry houses (each poultry house 55,821 per cycle - (it doesn't say how many cycles) - our calculation based on figures in available documents for one breeding cycle, 6.5 cycles per year 3.6 million per year - no EIA procedure initiated

Total farms in SMŽ - breeding approximately 88 million chickens per year

1 more project outside Sisak-Moslavina County

13. Ivanić Grad - PCC - 4 farms each 12 poultry houses (each poultry house 50,400 chickens per cycle per poultry house 6.5 cycles) – Total 15.7 million per year – no EIA procedure initiated

Total all farms 88 million in SMŽ county + Ivanić Grad – approximately 103 million chickens per year

According to the statement of the Croatian Chamber of Agriculture, this is 4 times more than is currently raised in the Republic of Croatia

<https://komora.hr/hrvatski-peradari-zatrzili-pomoc-eu-parlamenta-i-europske-komisije-u-zastiti-od-mega-ukrajinskih-investicija-u-hrvatski-peradarski-sektor/>

- Slaughterhouses -

14. Velika Ludina – MHP (Perutnina Ptuj/Pipo) - 225,000 pcs/day or 65,250,000 pcs/year – EIA procedure ongoing – Draft Decision has been adopted that it is environmentally acceptable, final Decision has not yet been adopted, so the procedure is still ongoing

15. Sisak – PCC – Ministry's decision that the project is not **likely to have a significant effect** on the Natura 2000 network for a slaughterhouse project with a biogas plant in Sisak has been given based on the investor's request submitted under the title Construction of a poultry processing complex and a biogas plant as part of the project *"Construction of a poultry farm for broiler farming with a capacity of 100 thousand tons per year with internal engineering infrastructure with the possibility of increasing the capacity to 150 thousand tons"* by the project owner then called Petrinja Chicken Company d.o.o.

Therefore, it is completely clear that the slaughterhouse and biogas plant are part of the entire system of chicken farms, slaughterhouses and animal feed factories, even though separate environmental impact procedures are carried out for each individual project and are presented to the public as separate and distinct projects.

Moreover, although the need for the Appropriateness Assessment was conducted for the capacity of 100 thousand tons per year with internal engineering infrastructure with the possibility of increasing the capacity to 150 thousand tons, the EIA that followed was carried out for a slaughterhouse and a biogas plant with a slaughter capacity of 84,240,000 heads per year, or 217 thousand tons per year. The EIA data strongly suggest that different data was used in deciding whether the Appropriateness Assessment was needed and that, as a consequence, it could not have been genuinely established whether the project is **likely to have a significant effect** on the Natura 2000 network. The EIA procedure is still ongoing, although the Study Evaluation Committee said that this project is environmentally acceptable.

The exact same request was submitted to the Ministry by an investor for 2 chicken slaughterhouses in Lekenik with the exact same name and description of the project. "Construction of a poultry processing complex and a biogas plant as part of the project "Construction of a poultry farm for broiler farming with a capacity of 100 thousand tons per year with internal engineering infrastructure with the possibility of increasing the capacity to 150 thousand tons" by the project owner than called Petrinja Chicken Company d.o.o."

16. Lekenik 1- PCC - The decision was issued in January 2023 - the calculation for 150 thousand tons per year, the average weight of a chicken is 2.5, is about 60,000,000 chickens per year - the EIA procedure was not initiated.

17. Lekenik 2 – PCC - The decision was issued in September 2023 - the calculation for 150 thousand tons per year, the average weight of a chicken is 2.5, is about 60,000,000 chickens per year - the EIA procedure was not initiated

-Hatcheries-

18. Lekenik – PCC – 120 million chickens per year - EIA procedure not initiated

-Animal food factories-

19. Popovača – MHP (Perutnina Ptuj/Pipo) - 200 000 t per year issued decision in the EIA procedure

20. Lekenik – PCC - 300 000 t per year. Ministry's decision that the project is not **likely to have a significant effect** on the Natura 2000 network for a project of food factory in Lekenik has been given based on the investor's request submitted under the title Construction of a poultry processing complex and a biogas plant as part of the project "*Construction of a poultry farm for broiler farming with a capacity of 100 thousand tons per year with internal engineering infrastructure with the possibility of increasing the capacity to 150 thousand tons*" by the project owner then called Petrinja Chicken Company d.o.o. - EIA procedure still ongoing

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