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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

34th meeting
Strasbourg, 2-5 December 2014

Other complaints

**PRESUMED DESTRUCTION OF BIRDS' AND BATS'
HABITATS DUE TO TOURISM DEVELOPMENTS IN
UKRAINIAN NATURAL RESERVES (UKRAINE)**

REPORT BY THE COMPLAINANT

*Document prepared by
Nature Protection Squad "Green Future,"*

PRESUMED DESTRUCTION OF BIRDS' AND BATS HABITATS DUE TO TOURISM DEVELOPMENTS IN UKRAINIAN NATURAL RESERVES (UKRAINE)

Report prepared by Nature Protection Squad "Green Future,"

This complaint denounces a breach by Ukraine, in the person of the Ministry of Ecology and Natural Resources of Ukraine, of Article 6 of the Bern Convention, the breach consisting in the destruction, as a result of large-scale visits by tourists, of the habitats of bats and rare bird species – the European shag (*Phalacrocorax aristotelis*), the peregrine falcon (*Falco peregrinus Tunstall*), the saker falcon (*Falco cherrug Gray*), and the rosy starling (*Sturnus roseus*) – which are specified in Appendix II to the Bern Convention. Each year the Ministry of Ecology and Natural Resources of Ukraine issues to the Opuk and Karadag Natural Reserves permits (so-called "ceiling limits") for the boating of tourists and for the walking tours of caves inhabited by bats and the above-mentioned bird species. As a result of stress caused by the tourists visiting the habitats, many bats die and birds abandon nests with eggs and squabs.

The area affected is the Opuk Natural Reserve, a colony consisting of up to 8,000 bats living in the local quarry caves is potentially affected; in the Karadag Natural Preserve, a colony consisting of up to 2,000 bats living in the seaside cliff caverns is endangered. Moreover, in the Opuk Reserve, an Opuk Mountain colony of rosy starlings consisting of up to 3,000 birds is affected; in the Karadag Reserve, a colony of shags consisting of up to 300 pairs living on the cliffs by the shore as well as 5 – 10 nests of peregrine falcons and saker falcons also located on the seaside cliffs are endangered.

A sharp decrease in the number of bats in bat colonies and of birds in colonies of rosy starlings and shags and total disappearance of peregrine falcons and saker falcons is to be feared.

The potentially affected species also fall under the scope of the Agreement on the Protection of Bats in Europe

ANNEX 1

Attachment to Complaint from the Nature Protection Squad "Green Future"

At present, illegal actions on the part of the Ministry of Ecology and Natural Resources of Ukraine (below, the Ministry of Ecology of Ukraine) result in a systemic adverse effect on natural habitats (nesting / wintering grounds) of rare species specified in Appendix II to the Bern Convention, in particular peregrine falcon (*Falco peregrinus Tunstall*), saker falcon (*Falco cherrug Gray*), European shag (*Phalacrocorax aristotelis*), rosy starling (*Sturnus roseus*), and various bat species, such as lesser mouse-eared bat (*Myotis blythii*), greater horseshoe bat (*Rhinolophus ferrumequinum*), and Geoffroy's bat (*Myotis emarginatus*).

Thus, each year the Ministry of Ecology of Ukraine endorses a permit for the Karadag Natural Reserve to boat visitors along the cliffs within the protected water area of the Karadag reserve. In summertime, these cliffs are used for nesting and chick rearing by saker falcon, peregrine falcon, European shag (up to 300 pairs); caverns in the cliffs by the shore are inhabited by a number of bat species (lesser mouse-eared bat, greater horseshoe bat, Geoffroy's bat) totaling about 2,000 animals.

As a result of the large-scale boat tours, which involve noise and holidaymakers swimming in the sea (there can be as many as 11 motorboats simultaneously anchored by the cliffs in summer), the above bird and animal species experience stress and leave their habitats / nests. And so, in the past few years the number of shags nesting there has decreased by 200. It should be noted that there are only two shag nesting areas in Ukraine, the Karadag preserve being one of them.

Furthermore, each year the Ministry of Ecology of Ukraine endorses a permit for the Opuk Natural Reserve to arrange walking tours of Opuk Mountain and the nearby quarries. Opuk Mountain provides habitat for a nesting colony (consisting of about 2,000 – 3,000 birds) of rosy starlings (there is only one other habitat of this species elsewhere in Ukraine); and the quarries accommodate a bat colony which is among the ten largest in Ukraine (lesser mouse-eared bat, greater horseshoe bat), consisting of 5,000 – 8,000 animals. Tourists visiting Opuk Mountain and the quarry caves harass the rosy starlings and the bats. In particular, as a result of stress caused by the tourists, female bats throw

their babies down on the cave floor, where they are trampled down by tourists' boots or eaten by vultures.

The above facts are a gross violation by Ukraine of the provisions of Article 6 of the Bern Convention, which prohibits the deliberate disturbance of wild fauna, the deliberate damage to or destruction of breeding or resting sites of species specified in Appendix II to the Convention.

In this connection, we kindly ask you to demand that the Ministry of Ecology and Natural Resources of Ukraine stop issuing permits (so-called "ceiling limits") to the Karadag Natural Reserve for the boating of tourists within the protected water area as well as permits ("ceiling limits") for the Opuk Natural Reserve for walking tours of Opuk Mountain and the quarries.

Respectfully,

Ivan Parnicoza,
deputy commander,
Nature Protection Squad "Green Future"