

COMPLAINT TO THE BERN CONVENTION:

Armenian Government has violated Article 4, point 1 and 2, Article 5 and Article 6 of the Bern Convention by issuing permits to the Amulsar Gold Project

44rd meeting of the Standing Committee, December 2024, Strasbourg

On behalf of group of
CSOs:

Andrey Ralev

CEE Bankwatch Network

#SaveAmulsar

Amulsar Gold Mine (Armenia)

2016: Amulsar Gold Project is approved in Armenia, 6 km from the spa town of Jermuk. Violations of Laws on Fauna, Flora and Lake Sevan, no consultations in Jermuk.

2017: Construction starts. IFC withdraws from financing.

2018-20: Local people block the access roads and construction is stopped. New Armenian government promises additional studies. EBRD withdraws from financing.

2020: Complaint 2020/04 to the Bern Convention elevated to Possible file in 2023.

2022-23: Lydian Armenia and government discuss resumption of the mine, Amendments to Mining Code and Strategy, funding secured from [Eurasian Development Bank](#), new EIA rejected, Jermuk National Park postponed.

2024: [Armenian government getting a stake](#) in the Amulsar project, preparation for reopening in 2025 [announced by Minister of Economy](#)

2018-2024: Strategic litigation against public participation (SLAPP) and smear cases in violation of Aarhus Convention (NGOs targeted in media as “threat to nat. security”).

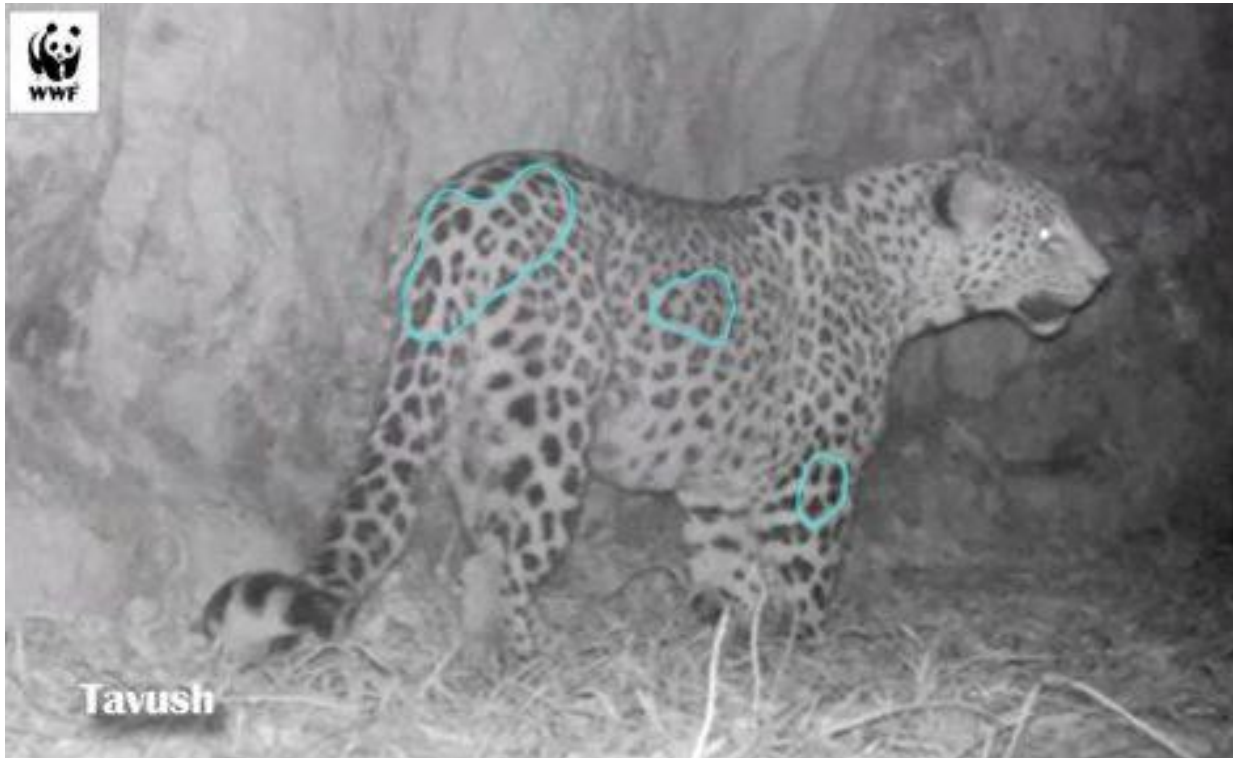


Heap Leach Facility using cyanide.

Above Arpa international river).

Lake Sevan also at risk.

- Many species not assessed.
- Recovering of Persian leopard.
- New species discovered.
- Expert opinions demand new EIA.



Emerald Network (Armenia)

2012: Jermuk National Park proposed, includes Amulsar Mountain.

2015-16: “Djermuk Area” and “Gorhajok Area” Emerald sites proposed.

2017 and **2019:** Biogeographical seminars with Armenia reaching **Sufficient Assessment** for most species and habitats.

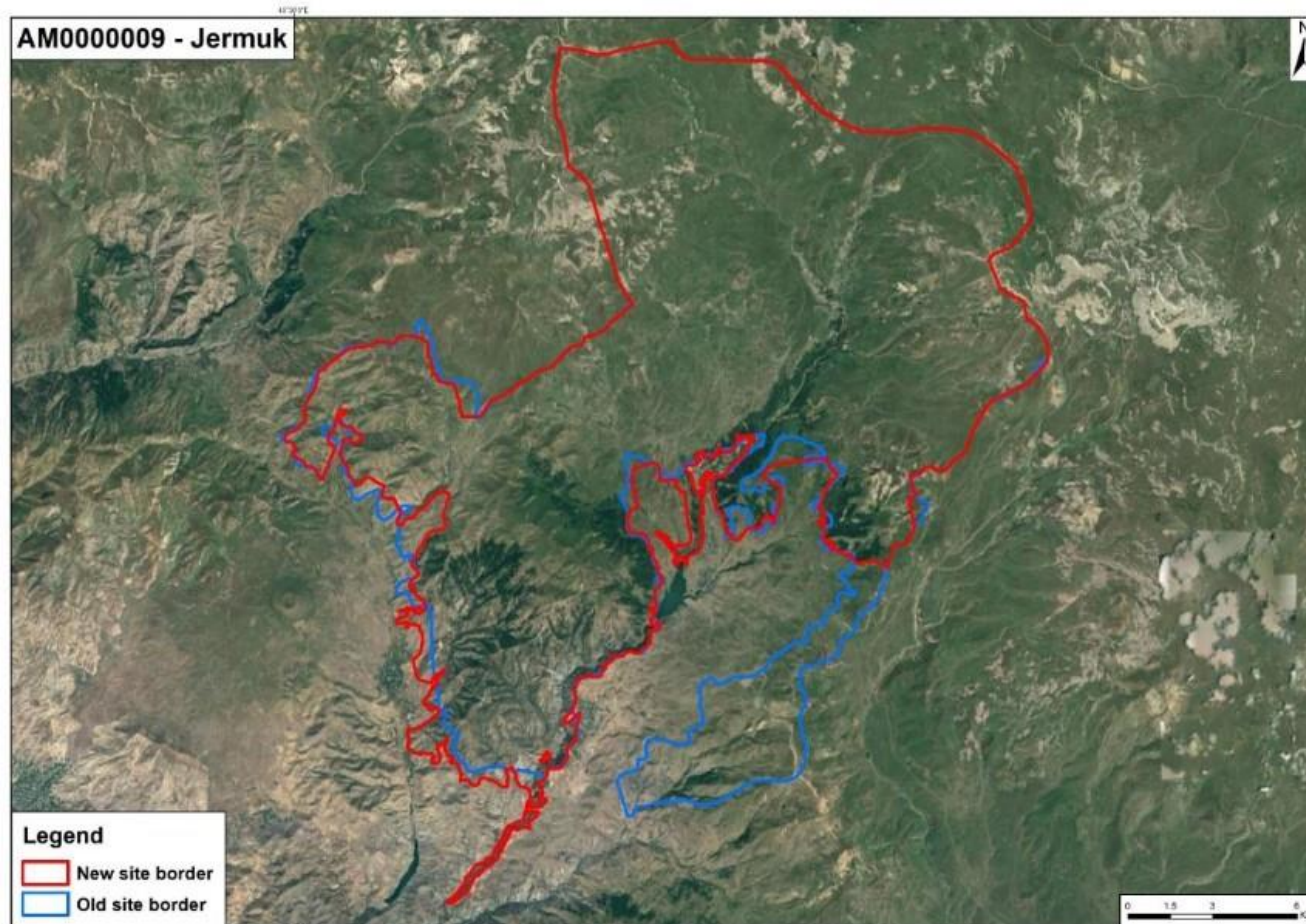
2023: Launch of the [EU4Environment project](#) funded by the EU and implemented by the World Bank with main goal **advancing the establishment of the Emerald Network and management of the Emerald sites**, but work on reducing the area of Emerald sites in Armenia.

2024: Document ‘[Recommendations for review of the Candidate Emerald sites in Armenia](#)’ published.



31.5% reduction of Emerald Network

Figure 10. Map of Emerald site 'Jermuk' - AM0000009 with proposed and previous (2016) boundaries



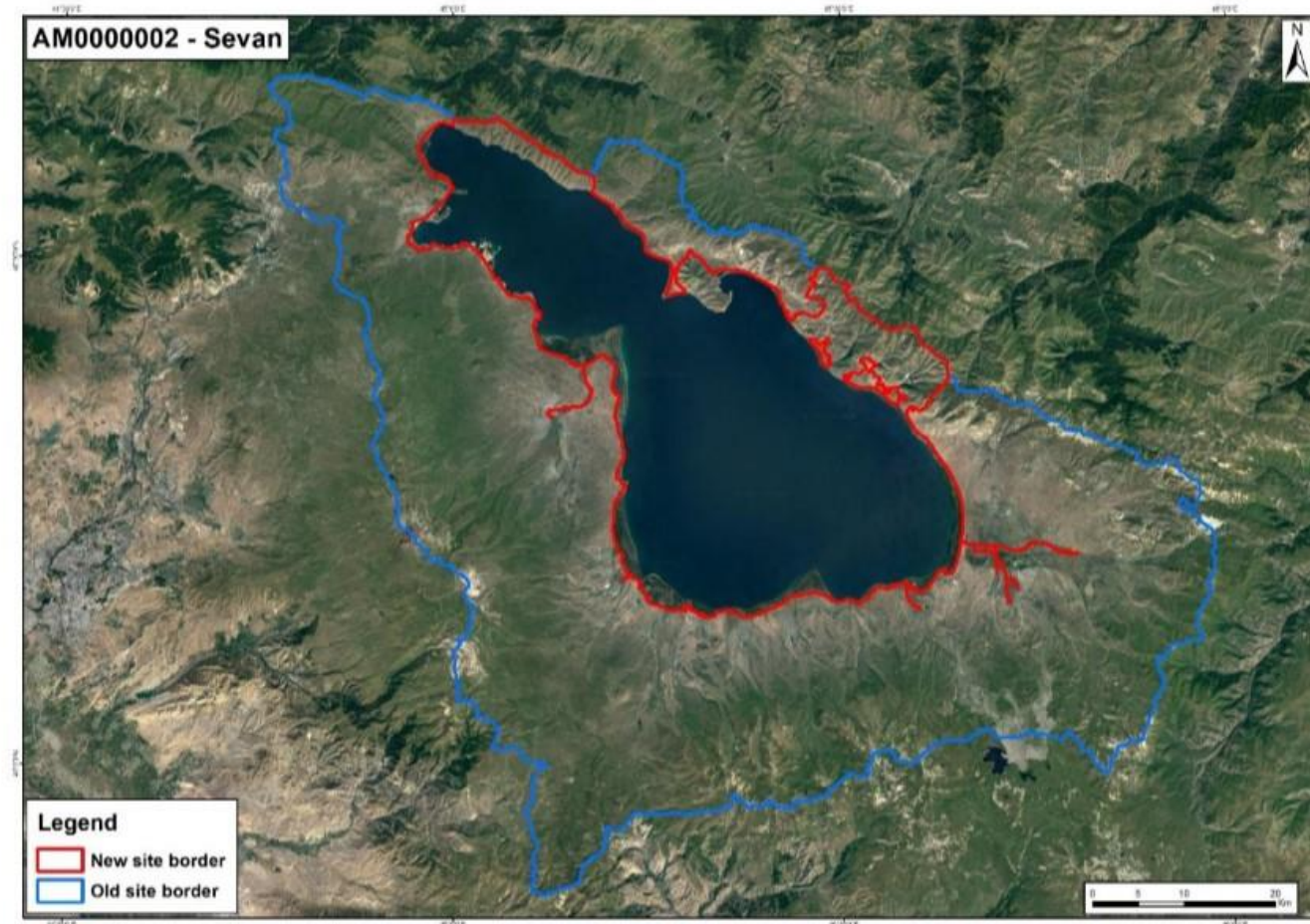
All Amulsar mountain excluded!

Ignoring ongoing restoration of nature (reported by the government) and many habitats not yet impacted by the gold mine.

Jermuk National Park stopped.

31.5% reduction of Emerald Network

Figure 3. Map of Emerald site 'Sevan' - AM0000002 with proposed and previous (2016) boundaries



Sevan reduced more than 3 times from 489.000 ha to 156.000 ha.

Reducing the number of protected natural habitats from 32 to 27.

Excluding the marshy area southeast and almost all mountains and grasslands.

Not consulted with NGOs!

Figure 14. Map of Emerald site 'Vorotan' - AM0000013 with proposed and previous (2016) boundaries



Source: Developed by kartECO for the World Bank

The EU-funded project is working in putting the Emerald Network one step backwards (new biogeographical seminar needed)

Sufficiency index will drop significantly!

Most important Lesser Kestrel (*Falco naumanni*) breeding and feeding habitat (close to Amulsar) excluded!

Standing Committee decision (2023)

- 1. reiterated the calls of the Bureau for the Armenian authorities to halt the construction of the gold mine,*
- 2. invited the Armenian authorities to revise the existing ESIA for the gold mine,*
- 3. asked to speed up the declaration process of Jermuk National Park,*
- 4. welcomed the statement of the authorities that they were taking steps to involve CSOs, more closely in the processes: urged strong efforts in this regard,*
- 5. took note of the request of the complainant to mandate an on-the-spot appraisal (OSA) to the site. However, due to the ongoing processes and assurances of the Armenian government, decided to postpone a decision on this until 2024.*

Aarhus Convention, Art.3(8)

"Each Party shall ensure that persons exercising their rights in accordance with the provisions of this Convention shall not be penalised, persecuted or harassed in any way for their involvement."

Armenian Government, October 2024:

'court cases involving Amulsar and environmental activists are strictly between private entities and do not involve the Government.'

We would like to ask the Standing Committee to:

1. **Open the file**
2. **Plan an on-spot-appraisal (OSA) mission** to Armenia in 2025 as still there is no possible involvement of NGOs and independent experts in the discussions related to the Amulsar gold mine and the Emerald Network in Armenia
3. **Call on the Eurasian Development Bank (EDB)** to cancel the loan to the Amulsar project
4. **Coordinate with the Aarhus Convention** to protect all activists
5. **Inform the EU4Environment project** funder (the EC) and implementing partners (OECD, UNECE, UNEP, UNIDO, the World Bank) about the possible problems with reducing the areas of the Emerald Network
6. **Recommend** the government as shareholder in Amulsar Gold Mine to initiate a **new EIA**
7. **Recommend** the government to resume the declaration process of **Jermuk National Park**

Thank you for your attention!



Thank you for your attention!

