

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

43rd meeting of the Standing Committee, November 2023, Strasbourg

On behalf of group of
CSOs:

Andrey Ralev

CEE Bankwatch Network

#SaveAmulsar

Brief history of Amulsar Gold Project (Armenia)

2012: Jermuk National Park proposed, includes Amulsar Mountain.

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

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

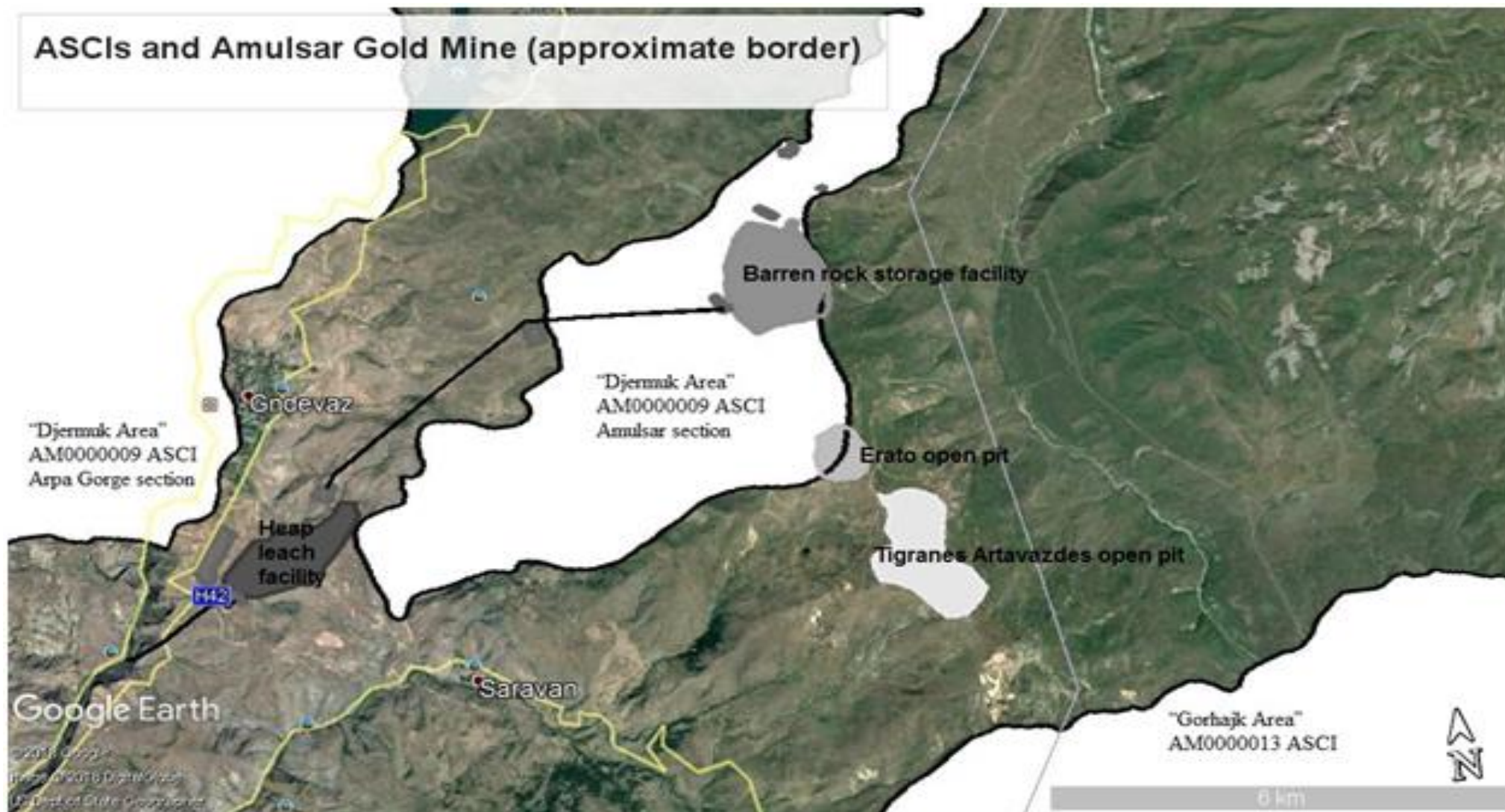
2017: Construction starts. IFC withdraws from financing.

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

2018-now: Strategic litigation against public participation (SLAPP) cases.

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

Emerald sites to be impacted:



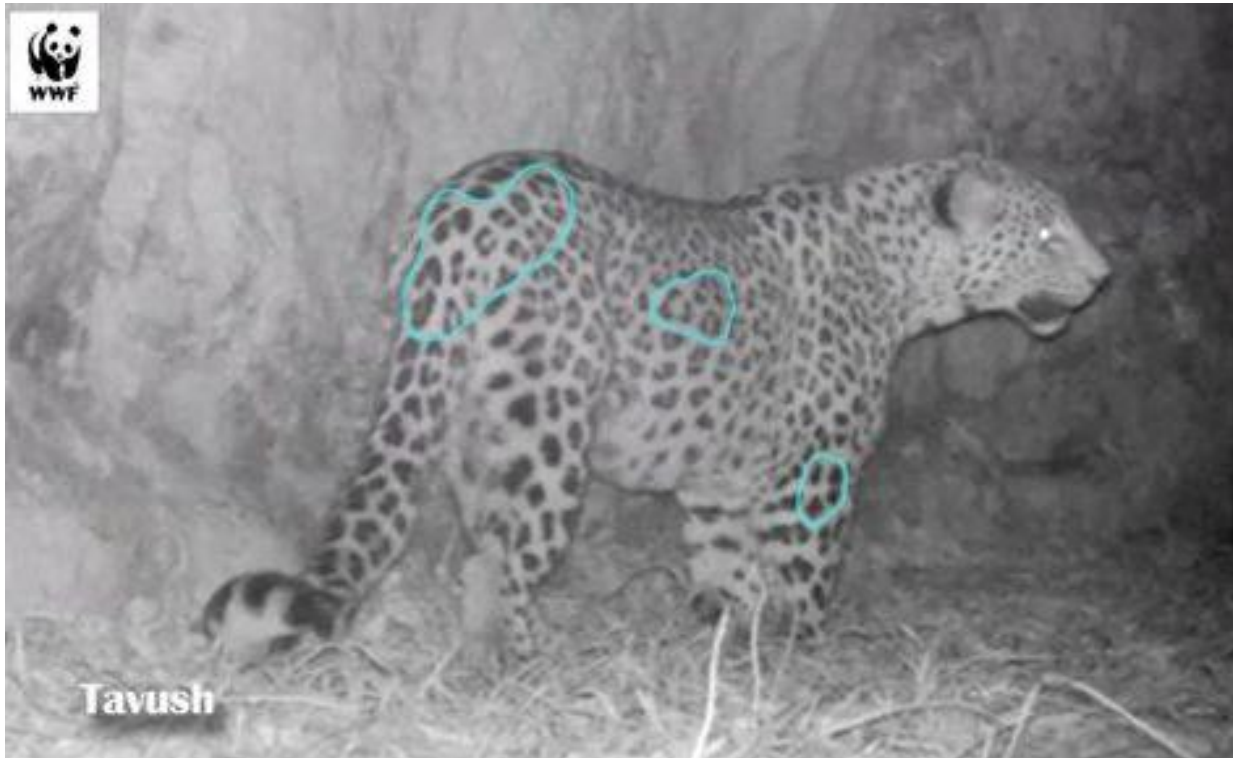


Heap Leach Facility using cyanide.

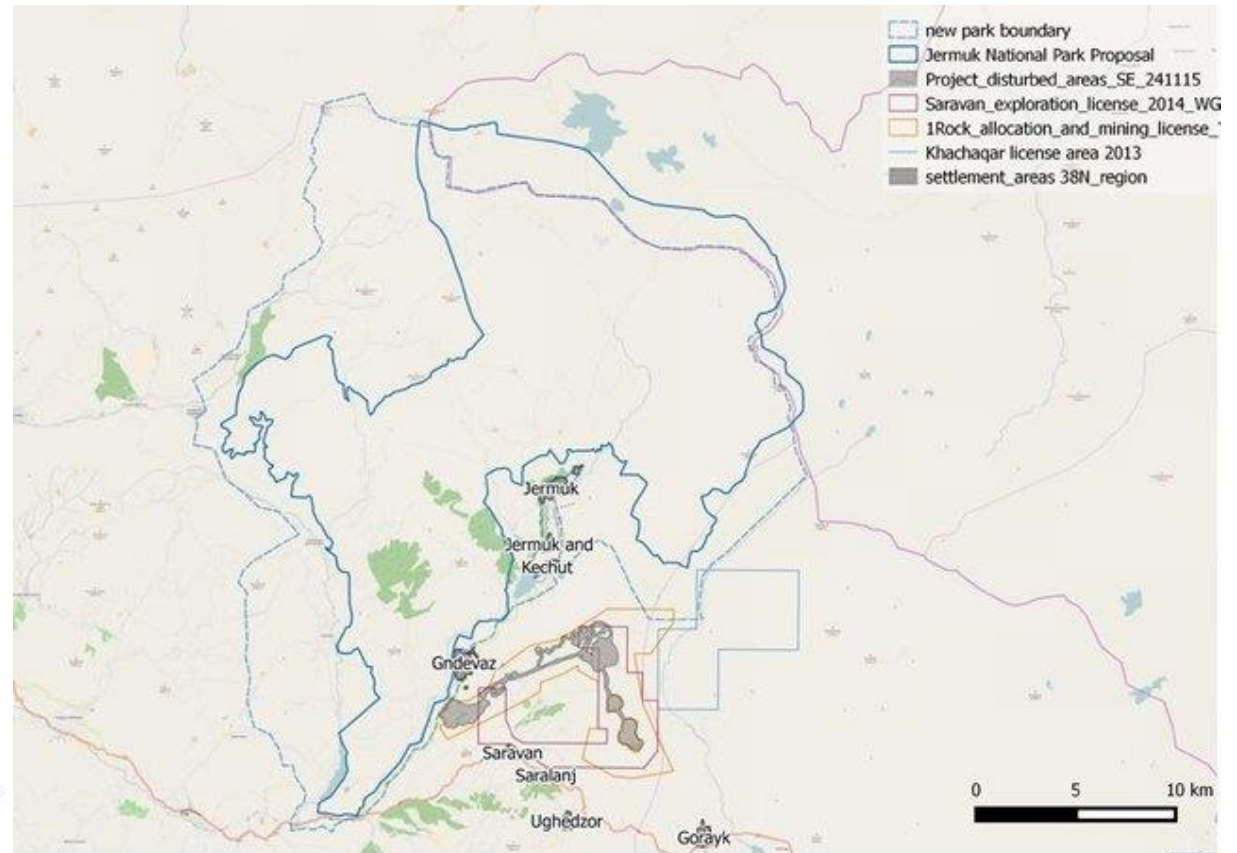
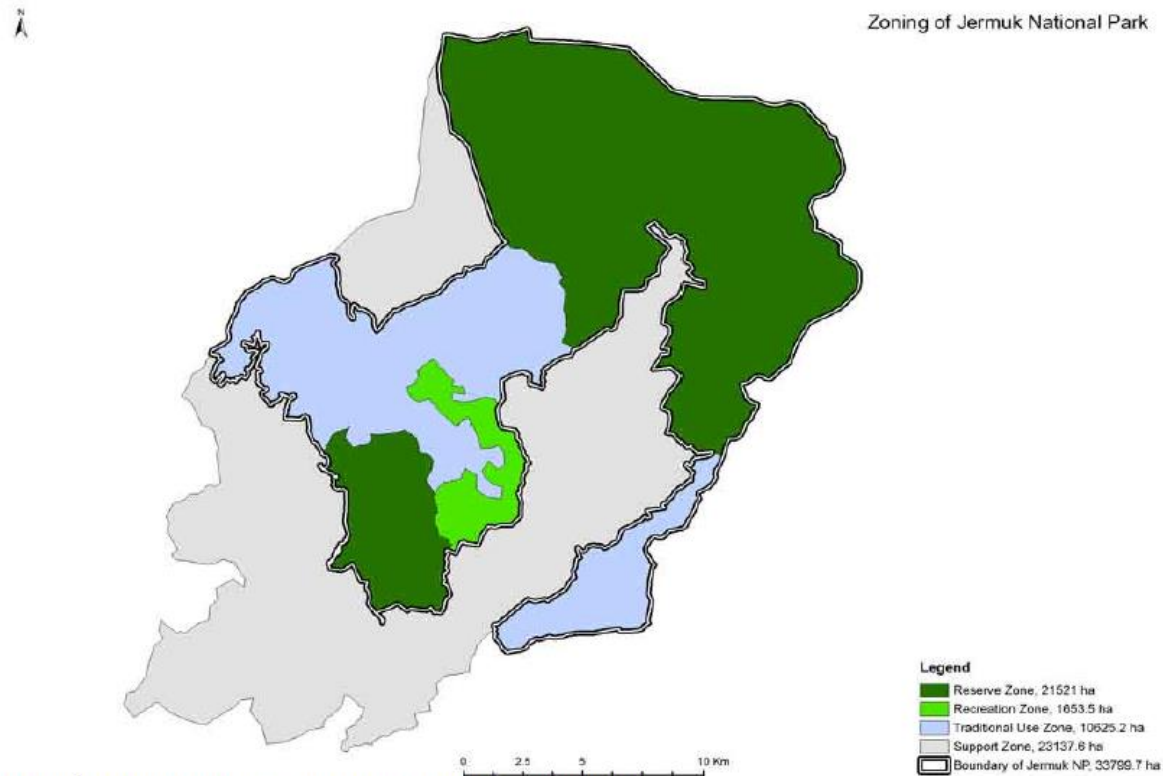
Above Arpa international river).

Lake Sevan also at risk.

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



- Jermuk National Park borders changed (2012 vs 2016) to exclude Amulsar.
- Does not include the whole Emerald site.
- Memorandum of understanding between Lydian and Ministry of Nature Protection (2016) to establish the park not carried out.



Նկար 4 - Նախատեսվող Ջերմուկ Ազգային Պարկի գոտիավորումը

Latest developments (Armenia)

June 2022: Amendments in the country's Mining Code – mining with old EIA allowed.

February 2023: Amulsar gold mine secured funding from the [Eurasian Development Bank](#).

March 2023: Workshop part of the [EU4Environment project](#) confirmed work on reducing the area of Emerald sites in Armenia.

May 2023: Mining Sector Development Strategy approved facilitating mining at Amulsar.

June 2023: Promoters of the project (Lydian Armenia) [met Deputy Prime Minister](#) and discussed resumption of this mine.

October 2023: Armenian government confirms that no new EIA will be done, that Jermuk National Park was postponed, that change in Emerald borders will be submitted.

We would like to ask the Standing Committee to:

- 1. Plan an on-spot-appraisal (OSA) mission** to Armenia as currently 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 and all decisions are taken behind closed doors;
- 2. To recommend the government to cancel the outdated environmental permits of the Amulsar Gold Project and to ask the investor to produce a new Environmental and Social Impact Assessment (ESIA)** taking in consideration the Bern Convention obligations;
- 3. To recommend the government to resume the declaration process of Jermuk National Park;**
- 4. To make sure that the recommendation of the Bureau from September 2020 is followed:** *“in the meantime, it recommended that the authorities halt any developments that can negatively affect the habitats and species protected under the Convention, whether it pertains to an Emerald Network site or not”.*

Thank you for your attention!

