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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Standing Committee

46th meeting,
7-11 December 2026,
Strasbourg

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Bureau of the Standing Committee

22-24 September 2026,
Strasbourg

Possible File: 2020/04

The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia)

- REPORT BY THE COMPLAINANT -

Document prepared by CEE Bankwatch Network, on behalf of "EcoLur" Informational NGO, Armenian Forests NGO, Green Armenia NGO

Update for the Autumn Bureau Meeting

August 2026

July 2026 report by the complainants: Complaint No. 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia)

On the Amulsar Gold Mine

The current government has ignored all calls by the Standing Committee, Bureau, civil society, and some authorities until 2020 (see below) to conduct a new Environmental Impact Assessment (EIA). A new EIA can still be done prior to the commencement of extraction activities. Construction at the site is ongoing at full scale, but as the government reports, gold extraction hasn't started. The heap leach facility (HLF) is not operational. In the HLF cyanide would be used to extract gold and poses the highest risks for people, nature and water resources, including for the transboundary Arpa river and Emerald sites downstream.

According to the progress report of the Ministry of Environment from 4 August 2026, the EIA is "*an ex-ante preventive procedure for planned activities before project authorisation. For an activity already assessed, authorised and partly implemented, the existing positive expert conclusion remains legally valid unless statutory grounds for its revision, suspension or invalidation emerge*." We believe this argument is not relevant and shall not be taken seriously against failing to implement its international commitments under the Bern Convention. It actually means that the respective competent authorities are not able to implement the commitments taken under the international agreements, just because the national regulatory framework does not envisage appropriate procedures. Moreover, as explained in our previous reports, there are legal arguments **at least since 2019** to invalidate the current EIA and start a new one. Back in 2019, the Minister of Environment provided to the office of the Prime Minister 13 points which could legally lead to requiring a new EIA (see original letter and translation in **Annex 1**).



Construction of facilities to transport gold ore, July 2026



Construction of facilities to process gold ore, July 2026

During a field visit by CEE Bankwatch Network and partners to the Amulsar area and Jermuk municipality in July 2026, we were informed by local people that they are not allowed to take their animals to the fields, so people have started to get rid of the animals. Additionally, there is a lot of dust, so animals don't eat the grass. The dust also poses risks to wildlife.

The local people reported that land mass has already been accumulated at the top of Amulsar Mountain and they feared that Acid Rain Drainage (ARD) could be produced soon, polluting the water they use, the Arpa river and the Kechut reservoir from where water is diverted towards Lake Sevan.

With regards to the information by the authorities in the report for the Spring Bureau, that "*no critical Emerald Network habitat types are significantly represented within the Amulsar project area and that the few species present on site that are protected under the Bern Convention are subject to close monitoring,*" we would like to point out that the mountain top of Amulsar mountain has/had some of the best represented natural habitats of "Djermuk" area Emerald site. Some examples include:

- D2.3 - Transition mires and quaking bogs (Djermuk is an A site with relative surface for the habitat more than 15% of national coverage and the gold mine could pollute some of the best represented mires)
- E2.3 - Mountain hay meadows (Djermuk is a B site with relative surface 2 to 15% of national coverage, gold ore extraction can change the hydrological regime and directly destroy large areas of the habitat)
- E3.4 - Moist or wet eutrophic and mesotrophic grassland (Djermuk is an A site, gold ore extraction can change the hydrological regime and directly destroy large areas of the habitat)
- E4.3 - Acid alpine and subalpine grassland (Djermuk is an A site, gold ore extraction can directly destroy large areas of the habitat)

Of course, the real magnitude of the impacts cannot be calculated without carrying out an Appropriate Assessment (AA) of the impact of the project on the Emerald site, as a stand-alone procedure or part of a new EIA procedure. This has been highlighted since 2018 by the complainants.

Regarding the claim by the government in the report from August 2026 that "*Armenia underlines that any measures concerning already authorised activities should be considered by the competent authorities in accordance with national legislation, applicable administrative procedures, updated scientific evidence and environmental safeguard requirements*", we would like to recall the Bureau that the Amulsar Gold Mine was authorised **AFTER** "Djermuk" area Emerald site was proposed in 2015.



Construction at the top of Amulsar mountain in natural grasslands habitats E3.4 and E4.3, protected under Resolution 4 of the Bern Convention, July 2026

On the Jermuk National Park

According to the government report from August 2026 "*The Jermuk national park process is in an active phase and remains a priority conservation initiative for the wider Jermuk region*." As we understood unofficially, there is ongoing work to prepare the documentation for the new national park. However, it is unclear if this will still be paid by the investor in Amulsar Gold Mine, if it will be counted as a biodiversity offset for the destruction of nature at Amulsar as proposed in the environmental and social impact assessment (ESIA) prepared for financiers and if the national park will include or exclude Amulsar mountain. If Amulsar is excluded, not the whole Emerald site would be protected. Public consultations haven't started and there is no timeline for the declaration of the park.

On the Emerald Network in Armenia

According to the government report from August 2026, "*The revision of the candidate Emerald Network sites is ongoing and implemented by the Ministry of Environment of the Republic of Armenia. In this regard, the Ministry has once again extended an invitation to the complainant NGOs to participate in phased technical consultations, and intends to include its results in the updated database package for submission to the Secretariat and consideration at a Bern Convention biogeographical seminar*."

A letter was sent to the complainant NGOs (**translation provided in Annex 2**) "*as an interim and practical solution, proposed to the Bern Convention Secretariat to submit in a phased manner the revised or newly proposed candidate Emerald areas to which there are no objections in principle. In that context, the following 3 areas were identified for preliminary consideration:*

1. "Ijevan" (AM0000005) revised candidate Emerald area, the area of which is proposed to be set at 49,499.42 ha instead of the previous 47,593.10 ha,

2. "Jajur" (AM0000006) revised candidate Emerald area, the area of which is proposed to be set at 3,057.40 ha instead of the previous 1,711.20 ha,

3. "Aragats" (AM0000010) revised candidate Emerald area, the area of which is proposed to be set at 21,237.53 ha instead of the previous 9,446.70 ha."

As the possible achievement of agreement on the three areas mentioned does not extend to the other candidate Emerald areas proposed in the report, the complainant NGOs agreed with a letter from Ecolur from 9 July 2026 on the changes and believe that Ijevan, Jajur and Aragats revised Emerald sites could move forward in the direction of formal adoption. We would like to highlight that **the so-called "*ongoing phased NGO technical consultations*" have no other clear timelines regarding the proposed changes in the other 27 Emerald sites. We also regret that the revision process has stopped the adoption and legal protection of the whole Emerald Network, which would most probably make it impossible for Armenia to fulfill the target 3 of the Global Biodiversity Framework in the remaining four years:**
*Ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are **effectively conserved and managed** through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures.*

We would also like to explain that the scientific studies carried out on the Amulsar mountain have nothing to do with the Emerald Network revision (especially for the other 29 sites). Most of the studies do not target habitats from Resolution 4 and species from Resolution 6 and, as such, should not be used as an excuse to postpone the adequate protection of the network.

Taking into account the full-scale construction of Amulsar Gold Mine; all the violations by the government of the Bureau and Standing Committee decisions to stop mining operations and start a new EIA procedure; the lack of progress in the declaration and management of the Emerald sites; and the lagging behind in achieving the targets of the Convention on Biological Diversity ahead of the COP17 to be hosted in Yerevan in October 2026 we call on the Bern Convention Bureau again to:

1. Send a strong signal to the government that protecting and effectively managing the Emerald Network, declaring Jermuk and Tatev national parks and stopping harmful activities in these protected sites (including mining) is crucial for achieving the requirements of the Bern and CBD conventions.

2. Coordinate with the Convention on Biological Diversity institutions ahead of the COP17 the possible synergies in protecting the Armenian nature and resolving the Amulsar case issues.

3. Plan an OSA mission to Armenia ASAP.

Annex 1. Translation of Letter from the Minister of Environment of the Republic of Armenia to the Head of the Prime Minister's Office (2019)

MINISTER OF ENVIRONMENT OF THE REPUBLIC OF ARMENIA

» 2019.

To: Head of the Prime Minister's Office

Mr. E. Aghajanyan

Dear Mr. Aghajanyan,

In accordance with the Prime Minister's instruction No. 02/12.4/38786 of August 21, 2019 and in response to information received from the public regarding the need to conduct a new environmental impact assessment of the development of the Amulsar gold-bearing quartzite mine by Lydian Armenia CJSC, I hereby inform you that the results of the independent expert examination by Elard and TRC companies have been submitted to the National Academy of Sciences (which, in accordance with the Law HO-135-N of April 4, 2011 “On the National Academy of Sciences of the Republic of Armenia”, is the official advisor to the government on scientific activities) and authorized state administration bodies for the purpose of obtaining a professional opinion. The Ministry of Environment has also examined the results of the environmental impact assessment of Lydian Armenia CJSC, Lydian International Ltd., Golder Associates, Global Resource Engineering.

Below I present the position of the authorized state administration bodies and the National Academy of Sciences of the Republic of Armenia, Elard and TRC companies regarding the documents of "Lydian Armenia" CJSC (including the environmental impact assessment report).

1) During the water quality modeling in the Acid Rock Drainage Management Plan, concentrations of simulated iron exceeding the natural state were observed: 0.000000566 mg/l, in groundwater, surface waters and rainwater this indicator ranges from 0.001-300 mg/l.

2) In the 2015 water quality modeling predictions used for the design of the passive treatment system, the aluminum concentration was calculated at 2.27 mg/l, and in 2017 it was revised and calculated at 27.2 mg/l.

3) The “Summary” section on page 166 of the EIA report states that “the Amulsar gold mine project area is located in a region where the annual evaporation rate exceeds the amount of precipitation.” However, Lydian Armenia CJSC estimated the evaporation rate in the requested area only based on the data from the Vorotan weather station. Moreover, the baseline data on climatic characteristics and the groundwater recharge calculation of the environmental impact assessment report present contradictory indicators on evaporation (EIA Table 2.1.3 and Table 2.6.10, respectively).

Table 1. Evaporation at the Vorotan Pass meteorological station according to the data set out in the 2016 EIA of "Lydian Armenia" CJSC, (mm)

In fact, instead of evaporation from the Vorotan Pass meteorological station, evaporation calculation data

were used in the calculation of groundwater recharge, which, according to the "Service for Hydrometeorology and Active Influence on Atmospheric Phenomena" SNCO, is a gross error and it is necessary to use the evaporation calculation data provided by the service.

The data presented by Lydian Armenia CJSC contradicts the data of the Ministry of Emergency Situations on the evaporation rate in the area (table 2).

Table 2. Evaporation at Jermuk and Vorotan Pass meteorological stations according to the Ministry of Emergency Situations for 2000-2018.

4) According to the data presented in the EIA report, the highest temperature in the Vorotan Pass was recorded in August - +21, the lowest in January - -12 degrees. This formulation does not correspond to reality and according to the data of the Vorotan Pass meteorological station, the maximum temperature in August reaches +30, and the minimum temperature in January -36 degrees. According to the “Service for Hydrometeorology and Active Influence on Atmospheric Phenomena” SNCO, the minimum temperature recorded in January implies calculated changes in the service life of open pit mines.

5) The EIA report states that wind gusts are rare in Jermuk, which is similar to the data recorded at Vorotan Pass. However, according to the Jermuk Meteorological Station, strong winds are frequent here and the maximum wind speed reaches 30 m/s, while at the Vorotan Pass meteorological station - 40m/sec at the station.

6) According to the EIA report, the maximum wind speed at the top of Amulsar was recorded at 15m/sec. However, according to the results of observations, winds of up to 40m/sec are recorded at the foot of Amulsar at the Vorotan Pass.

7) The report states that no data was found on the amount of water transferred from the Kechut reservoir to Lake Sevan, which is not true. The “Tsovinar” water gauge observation point of the MES hydrometeorological service has been operating on the Arpa-Sevan water pipeline since 1968 (working coordinates: 40.156265°, 45.494668°).

8) The report states that "Historical data on the flow of the Arpa and Darb rivers are not available, and no water gauging stations have been found on the Arpa River upstream of the Kechut reservoir in the vicinity of the project." The Ministry of Emergency Situations' Hydrometeorological Service has been operating on the Arpa River 4.0 km upstream of the Kechut reservoir since 1957. Arpa-Jermuk hydrological observation point (working coordinates: 39.837815°, 45.676694°).

9) According to the data of the "Service for Hydrometeorology and Active Impact on Atmospheric Phenomena" SNCO, an increase in the number of observed dangerous meteorological phenomena was recorded at the Jermuk and Vorotan Pass meteorological stations in 2015-2018.

10) Since the project area is characterized by heavy rainfall, it is necessary to calculate the maximum discharges of the 0.1% supply of the tributary of the “Puchur River” flowing into the Kechut Reservoir, which is formed from the mine area. This unnamed tributary originates from the area of the waste rock dump and during flooding may lead to contamination of the Kechut Reservoir with mining waste.

11) Local earthquake catalogs for the instrumental time period were not used during the seismic hazard assessment.

12) As a result of the study of the documents, it was found that after receiving the positive expert opinion BP-35 on the environmental impact assessment of the amended project of the mine mining complex on

April 26, 2016, the company conducted a number of additional studies and prepared relevant reports. They presented data and technical solutions that were not included in the environmental impact assessment in accordance with the procedure established by the legislation of the Republic of Armenia. In particular:

- the evaporation indicators characteristic of the mine area have been reviewed,
- the water balance of the open pit and waste rock dump areas has been revised,
- the aerobic treatment wet area of the passive treatment system has been replaced with anoxic limestone drainage.

The environmental impact assessment report prepared in 2016 for the exploitation of the Amulsar gold-bearing quartzite mine by Lydian Armenia CJSC did not include updated data, and no solutions related to them were considered.

13) According to the State Committee for Nuclear Safety Regulation under the Government of the Republic of Armenia, as a result of the preliminary study of the submitted documents, the following conclusions were reached: Section 2.9 “Radiation Background” of the EIA report for the Amulsar gold-bearing quartzite deposit should be completely revised, taking into account the report on uranium exploration works carried out in the Amulsar area in 1952-54. If the activity of the mineral exceeds the value established by the legislation of the Republic of Armenia, its management should be carried out in accordance with the requirements of the Resolution of the Government of the Republic of Armenia No. 439-N of April 25, 2013.

Based on the above and guided by paragraphs 1-2 of Part 2 of Article 21 of the RA Law "On Environmental Impact Assessment and Expertise" and the requirements of the RA Government Decision N428-N of April 22, 2015, I request your instruction to the Environmental Protection and Subsoil Inspection Body to conduct inspections.

E. Grigoryan

Annex 2. Translation of letter from the Deputy Minister of Environment of the Republic of Armenia to the Complainant NGOs on three Emerald sites (7 July 2026)

REPUBLIC OF ARMENIA
DEPUTY MINISTER OF ENVIRONMENT
REPUBLIC OF ARMENIA DEPUTY MINISTER OF ENVIRONMENT
REPUBLIC OF ARMENIA

No. 2/16.2/5772

Dear colleagues

By letter No. 2/16.2/12352 of the Ministry of Environment dated November 5, 2025, you were provided with the report on the recommendations for the review of the Emerald Network candidate areas in Armenia, prepared within the framework of the "European Union for the Environment (EU4Environment)" program, and it was proposed to discuss the possibility of starting a phased review process of the borders of the candidate Emerald areas.

The aforementioned note is an interim and practical solution, proposed to the Bern Convention Secretariat to submit in a phased manner the revised or newly proposed candidate Emerald areas to which there are no objections in principle. In that context, the following 3 areas were identified for preliminary consideration:

1. "Ijevan" (AM0000005) revised candidate Emerald area, the area of which is proposed to be set at 49,499.42 ha instead of the previous 47,593.10 ha,

2. "Jajur" (AM0000006) revised candidate Emerald area, the area of which is proposed to be set at 3,057.40 ha instead of the previous 1,711.20 ha,

3. "Aragats" (AM0000010) revised candidate Emerald area, the area of which is proposed to be set at 21,237.53 ha instead of the previous 9,446.70 ha.

The review of the boundaries of the above-mentioned areas is based on the need to ensure a more complete representation of the target species and habitats for the Emerald Network. At the same time, I consider it necessary to emphasize that the possible achievement of agreement on the three areas mentioned does not extend to the other candidate Emerald areas proposed in the report and cannot be interpreted as agreement on their boundaries or other proposed changes.

Taking into account that the Ministry has not received your position regarding the above-mentioned letter to date, as well as emphasizing the importance of proper involvement of civil society, ensuring scientific and professional discussions, the process of responding to the submitted observations, and recording progress towards fulfilling the obligations undertaken by the Republic of Armenia within the framework of the Bern Convention, I once again ask you to provide your position on the aforementioned 3 revised candidate Emerald areas as soon as possible.

Appendix: 1 file.

7/7/2026

ARAM MEYMARYAN

Update for the Spring Bureau Meeting

Ms. Alessandra Siino - Secretary of the Bern Convention

Ms. Marta Medlinska - Programme Manager

Mr. Michaël Nguyen - Administrative and Project Officer

February 2026 report by the complainants:

Complaint No. 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia)

DEAR MS. SIINO,

DEAR MS. MEDLINSKA, DEAR MR. NGUYEN,

As required by the 2025 Standing Committee hereby we send you an update report by the complainants relevant to the case 2020/04 The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia).

We recall that the Committee in its decision from December 2025:

- Recalled that the mining area is part of the candidate site for the Emerald Network. In order to comply with Article 4 of the Convention, national authorities are requested *to actively identify potentially harmful projects or activities, conduct timely and comprehensive impact assessment and authorise only activities compatible with conservation objectives according to Recommendation No. 225 (2024).*
- Requested the authorities to ensure that the *Environmental Impact Assessment (EIA) for the Amulsar project is brought fully in line with up-to-date scientific information*, including on newly recorded species and habitats, before the beginning of the extraction activity, given the existing controversies and the need to include new species.
- Took note of the *pending process to revise the Emerald Network in Armenia* and welcomed the efforts of the Armenian authorities to involve relevant stakeholders, including NGOs representatives, in the decision-making process.
- Recalled that *any changes to an Emerald site should be based on scientific evidence and not economic interest* and that any reduction of the site should be notified via the submission of a database and explained in line with the existing "Guidelines for Explaining Negative Changes in Emerald Network Proposed, Candidate and Adopted Sites"

Unfortunately, in the last two months since this decision, we do not see any progress in the direction of the recommendations.

1. **The construction activities at Amulsar have continued in full scale**.

We have no information whether extraction of gold ore has already commenced or not. This is a video of blasts at Amulsar published on December 23, 2025 on the Facebook page of the Armenian Environmental Front (https://www.facebook.com/reel/733685443108110).

2. **Lydian Armenia mining company, the investor at Amulsar Gold Mine, started a new SLAPP case against activist and journalist Tehmine Yenoqyan** (the director of Green Armenia, one of the complainants).

The reason is her Facebook status with a picture of dirty water saying that several times because of construction activities at Amulsar water has been polluted and even fires burst. Lydian demands to denounce this statement in mass media and to pay a fine of 6mln AMD (13000 EUR).

This is the link to the status on Facebook:
https://www.facebook.com/photo?fbid=25092015280418356&set=a.712973712082519

This is the link in Datalex system of Armenia's court cases:
https://datalex.am:443/?app=AppCaseSearch&case_id=27303072741161552

There have not been any new consultations on the Emerald Network review process.

Armenia has developed and put into circulation a draft decree on "National Biodiversity Strategy and Action Plan of the Republic of Armenia (2025-2030)." **Unfortunately, the implementation of the NBSAP is lacking**. The strategy's targets are derived from the 23 targets of the Kunming-Montreal Global Biodiversity Framework, which was adopted in 2022 at the 15th Conference of the Parties to the Convention on Biological Diversity. Among the most critical is Target 3, which stipulates that at least 30% of the Earth’s terrestrial and inland water ecosystems must be effectively protected by 2030. Consequently, each country must also ensure the protection of 30% of its own territory. According to the draft "National Biodiversity Action Plan of the Republic of Armenia 2025-2030," the following measures are planned to achieve this target:

- Expand the network of Specially Protected Nature Areas (SPNAs) to cover at least 16.6% of Armenia's territory.
- Revise the Republic of Armenia Law "On Specially Protected Nature Areas," ensuring the establishment and effective management of community-based and private protected areas, other Effective Area-based Conservation Measures (OECMs), micro-reserves, and ecological networks.
- Ensure the protection of at least 13.3% of Armenia's territory through Other Effective Area-based Conservation Measures (OECMs).
- Establish at least one biosphere reserve and nominate it for approval under UNESCO’s "Man and the Biosphere" (MAB) programme.

"EcoLur" Informational NGO sent an inquiry to the Ministry of Environment to clarify how Armenia intends to reach this target. In response, a letter (Ref. № 2/16.10/12191) from the Deputy Minister of Environment, Aram Meimaryan, stated:

"1. The current version of the Emerald Network does not yet have an officially confirmed status; the sites are currently presented as candidate sites. The final total area depends on the revision of their boundaries and official confirmation by the Secretariat of the Bern Convention. Therefore, at this stage, it is not possible to provide the territorial share of the Emerald Network as a percentage.

2. Regarding your second and third questions, I inform you that the Ministry of Environment has not submitted an official proposal to the Secretariat of the Bern Convention regarding the reduction of Emerald candidate sites. In 2023, within the framework of the 'EU4Environment' regional program, scientific work was conducted to review the Emerald Network. As a result, it was proposed to revise the boundaries of the candidate sites submitted in the 2016 package, based on scientific analyses of the representation of target species and their habitats. During the review, 30 candidate sites were identified with a total area of 707,700 hectares, whereas the 2016 package included 23 sites covering an area of 1,033,719.5 hectares.

3. The review report is currently in the discussion phase and has not yet been officially submitted to the Convention Secretariat for approval. The Ministry is organizing discussions with stakeholders (government agencies, scientific institutions, local self-government bodies, and NGOs) to finalize the results of the review. Only after the completion of this process will it be possible to define the final version and submit it to the Secretariat for confirmation.

4. Regarding the fourth question, I inform you that within the framework of 'Biodiversity and Sustainable Local Development in Armenia' project, financed by the German Development Bank (KfW), there are plans to establish 'Jermuk' National Park in Vayots Dzor Region and 'Tatev' National Park in Syunik Region. The establishment of these national parks is currently in the technical study and mapping phase; therefore, data regarding their area and boundaries cannot be provided at this time. Following the completion of the technical and feasibility documentation, stakeholder consultation discussions are planned."

Taking into account the full-scale construction of Amulsar Gold Mine; all the violations by the government of the Bureau and Standing Committee decisions to stop mining operations and start a new EIA procedure; the lack of progress in the declaration and management of the Emerald sites; and the lagging behind in achieving the targets of the Convention on Biological Diversity ahead of the COP17 to be hosted in Yerevan in October 2026 we call on the Bern Convention Bureau to:

1. **Send a strong signal to the government that protecting and effectively managing the Emerald Network, declaring Jermuk and Tatev national parks and stopping harmful activities in these protected sites (including mining) is crucial for achieving the requirements of the Bern and CBD conventions.**
2. **Coordinate with the Convention on Biological Diversity institutions ahead of the COP17 the possible synergies in protecting the Armenian nature and resolving the Amulsar case issues.**
3. **Plan an OSA mission to Armenia ASAP.**

Best regards,

Andrey Ralev

On behalf of the complainants “EcoLur” Informational NGO, Armenian Forests NGO, Green Armenia NGO, CEE Bankwatch Network