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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

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7-11 December 2026,
Strasbourg

Bureau of the Standing Committee

7-9 April 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*

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