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AND NATURAL HABITATS

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

- REPORT BY THE COMPLAINANT-

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

Update Report Dated November 2025

Ms. Alessandra Siino - Secretary of the Bern Convention
Ms. Marta Medlinska - Programme Manager
Mr. Michaël Nguyen - Administrative and Project Officer

**November 2025 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,

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).

Construction of the Amulsar Gold Mine started in 2025 in violation of the decisions of the 43rd and 44th Standing Committee!

As of November 2025 full scale construction work is ongoing at the Amulsar Mountain. A comparison of [Copernicus Browser satellite images](#) taken in 2018, 2024, and 2025 reveals that the Heap Leach Facility (HLF) underwent notable expansion during the last year (after natural restoration between 2018 and 2024 when the mine was not operational). A new structure (highlighted by the black arrow) was added alongside the HLF and very close to Arpa river. The government should specify what this new structure is, if it is included in the environmental permits and if it will store cyanide - highly toxic for humans and animals.



November 2018

November 2024



November 2025

Images taken by local people show the new structure is a very large pond/reservoir:

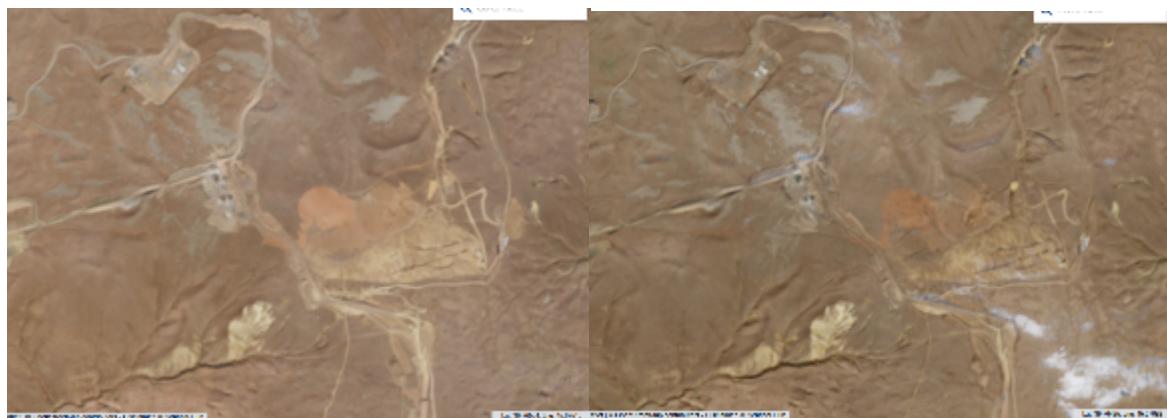


We would like to recall that the Amulsar Gold Mine would use cyanide leaching for extracting the gold - **a technology that is forbidden in many countries including Bulgaria, Czechia, Germany, Hungary, Slovakia, etc.** Spills or leaks can contaminate rivers, groundwater, and soil, killing fish and wildlife. Besides in the HLF, cyanide-containing wastewater would be stored in tailing dams which can break due to heavy rain, poor construction, or earthquakes and massive quantities can escape into the environment. Some of the worst environmental disasters globally have happened due to **cyanide spills**:

- 1971 — Moose Mountain Mine, Canada
- 1980s — Porgera Mine, Papua New Guinea
- 1989–1990 — Zortman–Landusky Mine, USA
- 1991 — Brewer Gold Mine, USA
- 1992 — Summitville Mine, USA
- 1995 — Omai Mine, Guyana
- 1998 — Kumtor Mine Transport Spill, Kyrgyzstan

- 2000 — Baia Mare Spill, Romania
- 2003 — Tisza River Contamination, Central Europe
- 2006 — Gold Quarry Mine, USA
- 2008 — Tarkwa Mine, Ghana
- 2010 — Aural Mine Spill, Romania
- 2012 — San Andrés Mine, Honduras
- 2015 — Veladero Mine, Argentina
- 2020 — Zhouqu County, China
- 2022 — Burkina Faso Transport Spill

It is unclear if ore extraction is ongoing, but the [government report from August 2025](#) stated that '*full-scale mining operations are tentatively scheduled to begin in the fourth quarter of 2025, contingent on finalizing financing and technical readiness*'. Satellite images reveal road restoration and excavation work at the top of Amulsar Mountain (black arrows).



November 2018

November 2024



November 2025

The investor [Lydian Armenia announced the restart of construction of the gold mine](#) at its website: '*Active construction is already underway, with 10 contractor companies engaged in*

completing the key mine infrastructures of the mine.'

Misleading information that the legal framework does not allow a new EIA

In violation of the Bern Convention Bureau and Standing Committee decision the government refused to initiate a new EIA. In the August 2025 report, the government said that '*In 2019, in light of ongoing public and environmental concern, the Government initiated an additional independent review, carried out by international experts from ELARD and TRC. (...) Following these developments, the matter was addressed in court. On 25 December 2024, the Administrative Court of Armenia issued a final decision confirming that the subsoil use permits granted to Lydian Armenia, including their amendments, constitute unappealable administrative acts and cannot be revoked either by the administration or by the courts. This legal interpretation means that the Government currently has no mechanism to suspend or invalidate the permits in force, nor to unilaterally require a new EIA in the absence of a change to the legal framework or significant new impacts.*'

The court case mentioned above was initiated by non-governmental organisations and has no relation to the 2019 EIA review initiated by the government. In a legal absurdity, the government tried to justify its violation of the decisions of the Bern Convention with a court case not related to the EIA review process in which the judges just gave a verdict that NGOs cannot appeal such environmental permits. Earlier the same month, [in another court verdict](#) which upheld the lawsuit filed by Armenian citizens against the planned exploitation of the Amulsar gold mine. As early as 2015, eleven residents of Gndevaz village and two non-governmental organizations filed a lawsuit demanding that a series of legal acts granting approval to the Amulsar project be declared unlawful. **The ruling by the court establishes that the environmental impact assessment was obtained in violation of the law and that the process itself was merely formalistic.**

During the case, the court also examined an independent expert report prepared by ELARD, which was part of a criminal investigation initiated by Armenia's Special Investigative Service (Case No. 69104218, dated July 22, 2019). The report identified several environmental risks, including:

- Impact on underground water sources.
- Acidic drainage from rock deposits and its effect on water quality.
- Poor surface water quality.
- Inadequate hydrological flow modeling in project simulations.
- Potential groundwater contamination from open-pit mining.
- Deficiencies in the passive water treatment system for waste rock disposal.
- Issues related to heap leaching solution management.
- High seismic risk in the project area.
- Unjustified post-closure cost estimates.
- Deficiencies in the environmental monitoring program.
- Lack of geolocation data for biodiversity assessments.
- Air pollution concerns.

The government has all the legal tools to start a new EIA process, as we stated in the original Bern Convention complaint and in the [2018 report about new circumstances](#) which was given to the government. Even if the parliament/government would not change the legal framework

(which would also be an option) the following circumstances could allow for a new EIA/ESIA procedure:

1. Missing assessment of the impacts of the Amulsar gold project according to the Bern Convention
2. EIA/ESIA report applies methodologies not reflecting the Bern Convention and incompatible with the Emerald Network
3. Possible impacts on species and habitats included in Standard Data Form of “Djermuk Area” AM0000009 ASCI
4. Possible impacts on other protected species and habitats
5. Pollution of Arpa river in June 2018 and possible threats to water ecosystems.

We note that according to Article 5, "Hierarchy of legal norms", point 3) of the Constitution of the Republic of Armenia, in case of conflict between the norms of international treaties ratified by Armenia and those of laws, the norms of international treaties shall apply. According to the Law on EIA, the promoter is obliged to start the activity for which the conclusion was received within 1 year after receiving the expert opinion. Considering that Lydian has not carried out mining until mid 2025, the expert opinion of 29.04.16 has become invalid and **the EIA should be declared invalid by the Ministry of Environment**.

Updates on the Emerald Network

We acknowledge the progress achieved during the meeting at the Ministry of Environment in July 2025 and the decision that no new database and borders of Emerald sites will be submitted to the Secretariat until there is a consensus with the NGOs and scientific community. We reported the results of the meeting for the Autumn Bureau, but unfortunately, no follow-up has happened since July.

Relationship Between Jermuk National Park Designation and the Amulsar Mine Project

We welcome the initiative to declare the Jermuk and Tatev national parks. In the August report, the government stated that: *‘The geographical and ecological overlap between the proposed national park and the Amulsar site necessitates careful planning and coordination. The Ministry is exploring models that would allow for the coexistence of conservation and regulated development, including zoning, buffer areas, and post-mining landscape restoration. (...) The Ministry of Environment will continue technical studies and multilateral consultations throughout 2025, with the aim of submitting a formal proposal for park designation in 2026.’*

We would like to highlight that according to the obligations of Armenia to the Bern Convention the whole Emerald site “Djermuk Area” AM0000009 should be protected. Also creating zones within the national park where mining is allowed will set a very dangerous precedent in Armenia. That is why a discussion about the national park borders and regimes should start as soon as possible.

As a conclusion, because of the full-scale construction of Amulsar Gold Mine and all the violations by the government of the Bureau and Standing Committee decisions to stop mining operations and start a new EIA procedure, we call on the Standing Committee

to:

- 1. Open the case file No. 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia).**
- 2. Plan an OSA mission to Armenia in 2026 before the Convention on Biological Diversity COP 17 to try to solve the issues related to the Emerald Network and the Jermuk National Park declaration.**

Best regards,

Andrey Ralev

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

Update Report Dated July 2025

Ms. Alessandra Siino - Secretary of the Bern Convention

Ms. Marta Medlinska - Programme Manager

Mr. Marc Hory - Project Manager

Mr. Michaël Nguyen - Administrative and Project Officer

July 2025 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. HORY,

DEAR MR. NGUYEN,

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).

Full-scale mining operations at Amulsar Gold Mine to start in the fourth quarter of 2025!

According to the update from the Government from 5 August 2025: “*As of mid-2025, only preparatory and construction works are underway. According to the company’s and competent authorities’ statements, full-scale mining operations are tentatively scheduled to begin in the fourth quarter of 2025, contingent on finalizing financing and technical readiness.*

In the meantime, a number of enhanced environmental safeguards have been put in place. Lydian Armenia is legally obligated to carry out continuous environmental monitoring and to submit regular reports in accordance with Government Decision No. 191-N of 2018. In this context, the company is working in partnership with the Scientific Centre of Zoology and Hydroecology and the Institute of Botany of the National Academy of Sciences to conduct a comprehensive biodiversity study of the Amulsar area. Fieldwork began in April 2025, and the findings will be incorporated into environmental performance assessments and reporting obligations.”

On July 22, a drinking water pipeline accident occurred in Gndevaz Village, part of Jermuk consolidated community in Vayots Dzor Region. The incident was posted on Facebook by Jermuk resident Shirak Buniatyan, who noted that [heavy machinery working on the dirt roads leading to Amulsar](#) damaged the village’s drinking water line, leaving residents without water for several hours during hot weather. According to circulating information, the equipment belongs to a contractor company hired by Lydian. In the next week additional machinery was transported to the Amulsar Gold Mine area.

According to the local people, 350 to 400 trucks and excavators were transported to the mining area. Additionally, the owners of the gold mine were hiring workers and, as the government reported, construction work was ongoing. This is very worrying, especially as it is happening during the new dialogue that has started with the Ministry of Environment, but no information was given to the complainants during the meeting.



Works at the Amulsar Gold Mine in July 2025, photo: residents from Jermuk municipality

Meeting with the Ministry of Environment

On July 28, 2025, a meeting of the complainants on the Amulsar project to the Bern Convention Secretariat was held with Hakob Matevosyan, Chief Specialist on Specially Protected Areas of the Nature and Biodiversity Department of the Ministry of Environment of the Republic of Armenia, Mari Chakryan, legal advisor and focal point to the Aarhus

Convention in the Ministry of Environment, Karen Aghababyan, EU4 Environment Country Activity Coordinator, World bank and Georgi Fayvush, Head of Department of Geobotany and Ecophysiology, Institute of Botany. The meeting was informal and cannot be considered official consultation regarding Amulsar Gold Mine nor the Emerald Network, but next steps regarding the Bern Convention complaint were consulted. The complaint states that the Amulsar project is already situated in the Djermuk Area candidate Emerald site, and may have a significant impact on the whole Emerald Network, including Sevan National Park (AM0000002) and the Gorhayk Area (AM0000002).

As we explained in the February 2025 complainants update to the Bern Convention, the report '[Recommendations for review of the Candidate Emerald sites in Armenia](#)', proposes the reduction of the Emerald Network in Armenia with 31.5%! We submitted our [comments to the review in February 2025](#) to the Bern Convention Bureau and to the Ministry of Environment. In the new proposal the areas located on the territory of the Amulsar mountain (not only the gold mining areas, but the whole mountain), are excluded from the area of the network.

Let us recall that Irina Ghaplanyan, who was Deputy Environment Minister from 2018 to 2020, [replied to the Bern Convention complaint on Amulsar](#): "*I would also like to note that several experts who participated in the project for the development of the candidate sites were contractually engaged as experts in the development of the EIA of Lydian Armenia's Amulsar Gold Mine Project. This circumstance is also subject to further inquiry by the Ministry and possibly other relevant authorities.*"

In our opinion, there is a conflict of interest within the expert community, which remains unresolved. As it turned out during the 28 July meeting, Georgi Fayvush and Karen Aghababyan, the experts developing the new borders of the Emerald sites, were the same ones who worked on the EIA for the Amulsar Gold Mine promoter Lydian. It seems to us that there is a conflict of interest, since the Standing Committee of the Bern Convention demands that the EIA for Lydian be declared invalid and a new EIA procedure be started.

During the meeting, the public organizations asked to clarify the Ministry's position on the new EIA procedure. Hakob Matevosyan did not provide a definitive answer, stating that the EIA procedure is regulated by law. However, on our part, we note that according to Article 5, "Hierarchy of legal norms", point 3) of the RA Constitution, in case of conflict between the norms of international treaties ratified by the Republic of Armenia and those of laws, the norms of international treaties shall apply. According to the Law on EIA, the promoter is obliged to start the activity for which the conclusion was received within 1 year after receiving the expert opinion. Considering that Lydian has not carried out mining to date, therefore, the expert opinion of 29.04.16 has become invalid and the EIA should be declared invalid by the Ministry of Environment.

The same response was given to the Secretariat's demand to suspend the company's activities at the Amulsar field until a new EIA was completed.

Regarding the new borders of the Emerald sites, Hakob Matevosyan ensured us that no new database and borders of Emerald will be submitted to the Secretariat until there is a consensus with the NGOs and scientific community. This is an important step and we are looking for the next steps for dialogue proposed by the Ministry. Until now, we have no information what these next steps will be.

Although we are grateful that dialogue started with the Ministry of Environment, there are still many issues unresolved and we hope for participatory and public meetings. We would all like to have the complaint resolved before the COP17 meeting of the Convention for Biological Diversity (CBD) to be held in Yerevan in October 2026. We also acknowledge that a finalised and well functioning Emerald Network would be one of the most valuable assets for Armenia to comply with the requirements of the CBD and Bern Conventions.

Other updates on the Amulsar Gold Mine

On February 6, RA Economy Minister Gevorg Papoyan spoke with journalists about the financing of the Amulsar gold mining project. Back in November 2024, Gevorg Papoyan stated that \$250 million was needed to launch the developing Amulsar mine, out of which \$100 million was already available. "The process is currently in a very active phase. Naturally, the private sector is negotiating. Everything is progressing towards securing the necessary financing. [We plan to begin extraction in October](#)," said Gevorg Papoyan. In response to a question about why the financing process is being delayed, the minister stated: "How can a \$150 million loan be obtained quickly and easily? Naturally, it is a complex process."

On February 27, 2025, the Armenian Government adopted a [decision "On Providing a Budgetary Guarantee" for a \\$150 million loan](#) from five Armenian banks to continue developing the Amulsar project. According to the decision, "Lydian Armenia" CJSC will be provided with a budgetary guarantee of up to 150,000,000 USD for the purpose of attracting credit funds from the banking system operating in the Republic of Armenia with a repayment period of up to 5 years and a nominal interest rate of up to 9 percent.

Armenian NGOs have [filed a lawsuit against the government](#) seeking to annul this decision, and the legal proceedings are in progress. The non-governmental organizations "Transparency International Anti-Corruption Center", "Green Armenia" and "Community Solidarity and Support Center", as well as a group of citizens from the communities adjacent to the Amulsar mine and various settlements of Armenia, applied to the Administrative Court on April 28, 2025, demanding to invalidate the decision of the Government of the Republic of Armenia dated 27.02.2025 No. 220-A on providing a budgetary guarantee, by which it is planned to provide a budgetary guarantee of up to 150 million USD to the "Lydian Armenia" company. The authorized representative of the plaintiffs in the court is attorney Genya Petrosyan, a member of the Chamber of Advocates of the Republic of Armenia.

Four of the five banks - Ardshinbank, Evocabank, Inecobank, and ACBA Bank—are longstanding EBRD partners in the field of 'green' investments. While some banks have informally denied participation in the Amulsar project, the government's decision remains in effect. Moreover, at its annual meeting in London, the EBRD announced several new agreements with Armenian banks, including Inecobank, Evocabank, Ameriabank, and Converse Bank.

In light of the above, [Armenian civil society organizations issued a joint statement](#) addressed to Georgi Akhalkatsi, Head of the Yerevan Resident Office of the European Bank for Reconstruction and Development (EBRD), calling on the bank to disclose its reasons for withdrawing from the Amulsar gold mine project. They urge the EBRD to engage in dialogue with its Armenian banking partners and to disclose its experience with the Amulsar project, including the reasons for its withdrawal and the significant environmental and social risks involved.

They call on the EBRD to ensure that its financing to Armenian banks—whether directly or indirectly, through financial intermediaries or equity investments not used to support the Amulsar mine, especially given the ongoing complaint submitted to the EBRD's Independent Project Accountability Mechanism (IPAM) by affected communities.

We call on the Bureau to:

1. Ask the government to stop all the ongoing works at the Amulsar Gold Mine before there is a Standing Committee decision on the issue and **if works continue to recommend the Standing Committee to open the file;**
2. Congratulate the Ministry of Environment's will to consult the Emerald Network review with the broader civil society and conservation community, but request the next consultation steps to provide room for scientific discussions and to answer to the [comments we provided on the review](#);
3. Request that the new list of candidates for inclusion in the Emerald network should be supplemented by the territories of Djermuk and Gorhayk sites. It is necessary to continue negotiations with the Ministry on this issue and provide the results of scientific expeditions as evidence. We are ready to collect some of them and present them to the Ministry of the Environment during further negotiations.
4. Inform the EU4Environment project financier (the European Commission) and the implementing partners (OECD, UNECE, UNEP, UNIDO, the World Bank) about the possible problems with reducing the areas of the Emerald Network and the possible conflict of interest as explained above;
5. Reiterate to the government to cancel the outdated environmental permits of the Amulsar Gold Project and, now that the government is a shareholder, initiate a new Environmental and Social Impact Assessment (ESIA) taking in consideration the Bern Convention obligations and decisions;
6. Recommend the government to resume the declaration process of Jermuk National Park covering the original borders proposed and the whole Emerald site.
7. Plan an OSA mission to Armenia in 2026.

Best regards,

Andrey Ralev

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

Update Report dated February 2025

Mr. Mikaël Poutiers - Secretary of the Bern Convention

Ms. Marta Medlinska - Programme Manager

Mr. Marc Hory - Project Manager

Mr. Michaël Nguyen - Administrative and Project Manager

February 2025 report by the complainants: Complaint No. 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites (Armenia)

DEAR MR. POUTIERS,

DEAR MS. MEDLINSKA,

DEAR MR. HORY,

DEAR MR. NGUYEN,

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 send our report on two separate issues: the Amulsar Gold mine, and the Revision of the candidate Emerald sites in Armenia.

Issue 1: the Amulsar Gold Mine

In spite of all the decisions of the Bern Convention Bureau and Standing Committee, the Armenian government continues to push forward the reopening of the Amulsar mine. On 27 December 2024, Lydian Armenia signed an agreement to transfer 12.5% of its shares to the Armenian government. In January 2025, the Armenian Economy Minister Gevorg Papoyan announced that “*mining operations at the Amulsar gold deposit in Armenia are anticipated to begin in September-October 2025*”.

He stated, “We believe the financing issue will be resolved shortly. With \$500 million already invested, an additional \$100 million will be contributed by the company, and the remaining \$150 million will be financed by our financial institutions.”

Hayk Aloyan, CEO of Lydian Armenia, the company holding the license for the Amulsar gold deposit, revealed that 70-80% of the required work to commence operations has already been completed. An additional \$250 million is needed to finalise the project.

The Eurasian Development Bank (EDB) has not made a decision regarding the financing of the Amulsar gold mine project, as Yaroslav Mandron, Deputy Chairman of EDB Management Board, informs in his letter dated 28 October 2024, responding to inquiries from representatives of Armenian civil society.

Issue 2: the revision of the candidate Emerald sites in Armenia and dialogue with civil society

As part of the EU4Environment project (financed by the EU and implemented by the World Bank) a drastic reduction of more than 30% of the Emerald Network in Armenia has been proposed. In January 2025, the complainant NGOs for the Amulsar case received by the Ministry of Environment a letter: *“In the context of the above circumstances and the official proposals submitted by the Secretariat of the Convention, in order to review the Emerald areas, discuss the issue related to the Amulsar mine, as well as to outline the necessary steps and develop a roadmap within the framework of fulfilling the obligations assumed under the Convention, with the involvement of all stakeholders, it is planned to organise a discussion at the Ministry of Environment.”*

Taking into account the above and the urgency of implementing the necessary work, I kindly request you to submit your proposals on the report on the proposals for the review of the candidate Emerald areas under discussion as soon as possible, as well as to provide candidates (also indicating the candidate's contact details) to participate in the discussion. The planned date of the discussion and you will be informed about the time.”

The letter was accompanied by an Armenian translation of the report: ‘[Recommendations for review of the Candidate Emerald sites in Armenia](#)’.

Two of the complainants participated in a meeting with the Ministry experts on 7 February 2025 in which they clearly disagreed with the proposal to exclude the Amulsar mountain from the Emerald Network. Furthermore, they said they would be ready to discuss the other Emerald sites.

Attached to this report are our initial comments to some selected Emerald sites. Our general comments are the following:

1. The goal of the [EU4Environment project](#) in Armenia is “*advancing the establishment of the Emerald Network and management of the Emerald sites*”, so it is quite problematic that the project staff is working for more than a year in reducing the area of the Emerald Network in Armenia and changing the borders of all the Emerald sites. This puts Armenia one step backwards in the process of establishment of the Emerald Network - all sites have to go through a new biogeographical seminar. This can happen not earlier than 2026 and only after that (if the change proposals get approved) the sites can become nominated candidate sites again, and be officially protected and managed. This would most probably not allow Armenia to reach the target of 40% of Emerald sites with management plans until 2030. Moreover, as [host of the next Conference of the Parties \(COP17\)](#) to the Convention on Biodiversity (CBD) in 2026, Armenia will be lagging way behind in its commitments to the CBD targets to protect 30% of its land area until 2030.

2. There is a **31.5% proposed reduction of the Emerald Network** for the whole territory of Armenia! Currently, the country has the highest sufficiency index (68.7%) of all signatories to the Bern Convention, only after the United Kingdom. This means that the candidate Emerald sites are well designed and ready to be designated, unlike Georgia and Azerbaijan for example, which have a sufficiency index of 30.9% and 21.7% respectively. The proposed reduction of the network would certainly decrease the index and make many species and habitats insufficiently protected, for example the lesser kestrel (*Falco naumanni*), the common crane (*Grus grus*) and several other birds, the orchid *Dactylorhiza chuhensis* and other plants, natural and seminatural grasslands and other habitats. Large areas for these species and habitats are proposed for exclusion.
3. We support some of the changes in the Emerald Network, for example the increase of the area of AM0000010 Aragats or the new AM0000029 Teqsar site, but believe some of the other changes are very problematic. In violation of the text of the Bern Convention and the **Recommendations** related to the Emerald Network, some borders have been changed not based on scientific reasons (presence or absence of species and habitats), but on possible future harmful activities (AM0000009 Jermuk excluding Amulsar gold mine, AM0000004 Lake Arpi excluding private lands). Moreover some of the borders are modified in a way that makes the site impossible to manage (AM0000011 Dilijan).

Although we see a positive development in that the authorities are sharing information with and willing to involve the complainants in the consultations, we hope the changes to all Emerald sites will not be proposed. If approved, the revised borders would be a very worrying development which may lead to **Insufficiency** assessment for many species and habitats that were assessed as **Sufficient** during the last two biogeographical seminars.

We therefore call on the Bureau to:

1. Request from the Government of Armenia that the Emerald Network review is consulted with the broader civil society and conservation community in a meaningful period of time;
2. Inform the EU4Environment project financier (the European Commission) and the implementing partners (OECD, UNECE, UNEP, UNIDO, the World Bank) about the possible problems with reducing the areas of the Emerald Network;
3. Reiterate to the government to cancel the outdated environmental permits of the Amulsar Gold Project and, now that the government is a shareholder, initiate a new Environmental and Social Impact Assessment (ESIA) taking in consideration the Bern Convention obligations and decisions;
4. Recommend the government to resume the declaration process of Jermuk National Park.

Best regards,

Andrey Ralev

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