



Strasbourg, 20 February 2025

TPVS/Files(2025)2020-04\_gov

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**  
45<sup>th</sup> meeting  
Strasbourg, 8-12 December 2025

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**Bureau of the Standing Committee**  
8-10 April 2025  
Strasbourg

**Possible File: 2020/04**

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

**- REPORT BY THE GOVERNMENT -**

*Document prepared by  
Republic of Armenia Ministry of Environment*

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REPUBLIC OF ARMENIA  
MINISTER OF ENVIRONMENT

РЕСПУБЛИКА АРМЕНИЯ  
МИНИСТР ОКРУЖАЮЩЕЙ СРЕДЫ

№ № 1/ԼԽ/1791

« 14 » « 02 » 2025թ.

To: Mr. Mikaël Poutiers  
Secretary of the Bern Convention  
e-mail: bern.convention@coe.int

Dear Mr Poutiers,

The Ministry of Environment of the Republic of Armenia presents its compliments to the Secretariat of the Convention on the Conservation of European Wildlife and Natural Habitats and expresses its gratitude for the continued cooperation and valuable contributions towards uniting countries in the conservation of global nature. With reference to the Secretariat's request dated on 20 December 2024, and taking into account all circumstances related to the Emerald sites and the Amulsar gold mine project in Armenia, as discussed at the 44th meeting of the Standing Committee, we would like to provide a progress report containing the requested information along with other relevant updates.

**1. Process of reviewing the candidate Emerald network sites, including changes to their boundaries and the involvement of stakeholders in the review process.**

In 2017, the list of candidate Emerald network sites for Armenia was presented to the Secretariat of the Convention. In this context, it should be noted that there was a slight miscommunication, as prior to its submission to the Secretariat of the Bern Convention, the list of candidate sites had not been officially or fully communicated to, nor agreed upon with, the Ministry of Environment, other relevant national authorities, or local communities.

The submitted list consisted of 23 potential sites, covering more than 1 million hectares, which accounts for 34.8% of the entire territory of the Republic of Armenia. As previously mentioned, a technical issue within state institutions during the development

of the proposed Emerald Network sites in Armenia affected the manageability of these sites. One example is the candidate Emerald site "Sevan" (AM0000002), which includes areas that do not fully correspond to the habitats of protected plant and animal species. Furthermore, the area contains numerous settlements, industrial zones, and other infrastructure (some of which are illustrated on Map No. 1, attached in the Annex). The boundaries of the "Jermuk" Emerald site (AM0000009), as well as other sites, were also adjusted following a similar approach.

Taking into account the above-mentioned points, we initiated a revision of the potential Emerald network sites within the framework of the EU4Environment program, implemented by the World Bank. The World Bank engaged both local and international experts in the process. The areas under revision fully or partially overlap with the territories of forest enterprises, national parks, state reserves, sanctuaries, protected landscapes, and planned sanctuaries. For instance, the Jermuk Emerald site includes three specially protected areas of nature.

During the revision process, the creation of entirely new candidate Emerald sites was also proposed, considering the area's abundant ecosystem and the presence of habitats for endangered species. Furthermore, the boundaries of several proposed Emerald network sites have been expanded, and in some cases, entirely new candidate sites have been added (as illustrated on Maps No. 2 and 3 in the attached Annex).

As it was previously mentioned, the proposals for the revision of candidate Emerald sites were circulated among all interested parties, including ministries, state institutions, scientific organizations, local communities, and other relevant stakeholders.

- To discuss the received proposals and objections, a working discussion was held at the Ministry of Environment on February 4, 2025, with the participation of representatives from all relevant state bodies and scientific organizations. During the meeting, all aspects of the proposed revision of the Emerald network sites were discussed, and the majority of the raised issues were clarified.
- To discuss the received proposals and objections and find joint solutions, a working meeting was held at the Ministry of Environment on February 7, 2025, with representatives from the complaining NGOs (EcoLur Informational NGO, Armenian Forests NGO, Green Armenia Environmental Education NGO). It should be noted that, despite an invitation from the Ministry of Environment, the representative from "Green Armenia" did not attend the meeting. The discussion with representatives from the other NGOs took place in a constructive atmosphere, addressing issues related to the obligations under the Convention, the proposal to review the Emerald territories, and the Amulsar gold mine project. During the discussion, an agreement was reached to continue the constructive dialogue and seek common solutions. It was also decided to organize further

discussions with a wider public participation aimed at providing justification for the revision of the Emerald Network sites.

It is worth noting that some of the aforementioned NGOs, such as EcoLur Informational NGO, are members of the committee established by a decision of the Prime Minister of the Republic of Armenia to support the preparations for COP 17 of the Convention on Biological Diversity, which will be hosted in Armenia in 2026. The primary mandate of this committee is to develop strategic roadmaps and propose substantive measures within the framework of the Convention. Additionally, these NGOs, along with many others, are actively engaged in the working group within the Ministry of Environment of Armenia, contributing to the country's preparations and participation in COP 17 of the UNCBD. The Government of Armenia and the Ministry of Environment actively communicate and cooperate with these NGOs on various environmental and policy matters, including preparations for COP 17 of the Convention on Biological Diversity. This engagement continues irrespective of specific concerns or positions expressed by certain NGOs, such as those related to the Amulsar mine.

**2. Regarding request of a new Environmental Impact Assessment, which considers all the species and habitats present in the area.**

As mentioned before the activities on the use of underground resources in the Republic of Armenia are subject to environmental impact assessment and expertise, during which each person and organization is free to participate in the process and state its position on the planned project. Thus, each person was free to express their position while Lydian Armenia CJSC was obtaining permission to launch the project. Based on national legislation, Lydian Armenia CJSC submitted a report on the environmental impact assessment (the "EIA") of the comprehensive development project of the Amulsar gold-quartzite mine. In turn, the Ministry of Nature Protection of the Republic of Armenia submitted the EIA report to the "Environmental Impact Expertise Centre" SNCO for expert assessment. The EIA was approved on April 29, 2016 by the Ministry of Nature Protection of the Republic of Armenia.

On March 18, 2019, a comprehensive environmental, geological, hydrological, geophysical, chemical, construction-technical, and economic expert report was also commissioned. This was entrusted to third party experts from the ELARD company and TRC company, and all expenses were allocated from the state budget.

After receiving the expert conclusion, the results of the independent examination of the «ELARD» and «TRC» companies were transferred to the National Academy of Sciences and authorized government bodies to obtain their expert input.

According to the decision of the Administrative Court of Armenia on December 25, 2024, the subsoil use permits issued to the company are unappealable administrative acts and cannot be invalidated through administrative procedures or court decisions. Specifically,

the court ruled that the subsoil use permits issued to the company in 2012 are amendments to the main permits. Therefore, given the legality of the main permits, the legality of these amendments cannot be questioned either.

Based on national legislation, Lydian Armenia Company is under a continuing obligation to submit an annual report on the results of monitoring in the Amulsar mine area, which also includes a study of the biodiversity of the mine and adjacent areas conducted by specialists from the Institutes of Zoology and Hydroecology and Botany of the National Academy of Sciences. The company plans to conduct detailed biodiversity research in 2025. Discussions have already begun with the Institutes of Zoology and Hydroecology, and Botany of the National Academy of Sciences to prepare the terms of reference for the monitoring. The company intends to sign a contract with these institutes by March 31, 2025, with fieldwork scheduled to begin on April 1 of the same year.

### 3. Regarding discussions concerning the Jermuk National Park

As previously mentioned, the Ministry of Environment, with funding from the German Development Bank (KfW), initiated the Biodiversity and Sustainable Local Development in Armenia program. Within the framework of this program, the study of prerequisites for the creation of Jermuk National Park is currently in the preliminary stage. It is also important to note that the creation of Jermuk National Park is fixed in the Strategy for the Development of Specially Protected Areas of Nature of the Republic of Armenia.

Moreover, a memorandum was signed between Lydian Armenia and the Ministry of Environment regarding the establishment of Jermuk National Park on December 12, 2016. As part of this memorandum, baseline data collection activities were conducted in 2017–2018. However, due to the temporary suspension of work at Amulsar, these activities were also put on hold.

Sincerely,



Acting: Aram Meymaryan



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