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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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**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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**Update Report dated December 2025**

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REPUBLIC OF ARMENIA  
MINISTER OF ENVIRONMENT

РЕСПУБЛИКА АРМЕНИЯ  
МИНИСТР ОКРУЖАЮЩЕЙ СРЕДЫ

№ \_\_\_\_\_

«\_01\_» «\_\_08\_\_\_\_\_» 2025թ.

To: Ms. Alessandra Siino  
Secretary of the Bern Convention  
e-mail: [bern.convention@coe.int](mailto:bern.convention@coe.int)  
Tel. +33(0)3 90 21 50 45

Dear Ms. Siino,

We express our deep gratitude to the Secretariat of the Bern Convention and, for the constant support and cooperation provided to the Republic of Armenia while implementing the goals of the Convention.

Please find below the short progress report by the Ministry of Environment of the Republic of Armenia which contains the latest developments and actions taken so far in response to Bureau recommendations and stemming from ongoing stakeholder consultations.

**Updated Report of the Government of Armenia on Bern Convention Complaint No. 2020/04 (Amulsar Gold Mine Project and Emerald Network Sites)**

**Abstract**

This report is an official update on the status of the Amulsar gold mine project and related conservation measures in Armenia, following the Bureau's conclusions of April 2025 and subsequent developments. Several non-governmental organisations have recently filed a legal challenge against a government decision providing a state financial guarantee for the project. In April 2025, a group of NGOs petitioned the Administrative Court to annul Government Decision No. 220-A (27 February 2025), which approved a budgetary guarantee of up to US\$150 million for Lydian Armenia CJSC. This case is currently under review, and the Armenian authorities will inform the Bern Convention Secretariat on the possible relevant decisions due to the course.

Meanwhile, the mining operations at Amulsar have not yet commenced; only construction and preparatory works have resumed since July 2025.

Taking that into consideration, the Government has intensified environmental oversight. A comprehensive biodiversity study of the Amulsar area is being conducted by the National Academy of Sciences of Armenia, with field surveys initiated in April 2025 and results expected by February 2026. Since 2018 numerous measures have been implemented to prevent, reduce or offset potential ecological impacts, including a suite of environmental management plans and a program to relocate an endangered plant species (*Potentilla porphyrantha*) discovered in the Amulsar area.

Simultaneously, Armenia has advanced the revision of its Emerald Network candidate sites through a scientific and participatory process. New Emerald sites have been proposed and some existing sites expanded, even though the overall area of candidate sites has been adjusted. Constructive dialogue with all stakeholders, including the complainant NGOs, has begun and will continue to ensure transparent review of the proposed changes. Concurrently, the establishment of a "Jermuk" National Park is being pursued as an important compensatory conservation measure. With the support of a German-funded program, biodiversity assessments, habitat mapping, and local stakeholder consultations were conducted in 2025, while formal steps for the park's designation will start in 2026. Such actions reflect Armenia's continued commitment to the Bern Convention and its efforts to meet biodiversity conservation with the responsible development of the Amulsar project.

### **1. Regarding the Court Proceedings Initiated Against the State Guarantee**

According to the information provided, on 28 April 2025, the non-governmental organizations Transparency International Anticorruption Center, Green Armenia and Community Solidarity and Support Center, together with a group of citizens, have filed a claim before the Administrative Court of Armenia requesting the annulment of Government Decision No. 220-A of 27 February 2025 on granting a budgetary guarantee. That Government decision provides for a state budget guarantee of up to 150 million US dollars to Lydian Armenia CJSC. At this stage, information concerning these court proceedings is being gathered; once this process is completed, the relevant information will be conveyed to the Secretariat.

### **2. Regarding the Works Being Carried Out at Present**

As already mentioned, on 27 February 2025, the Government adopted a decision to provide a loan guarantee (with a possible repayment term of up to 5 years and a nominal interest rate of up to 9%) in order to attract financing from Armenia's banking system for the implementation of the Amulsar mining project. Already having received a portion of the funds within this guarantee, Lydian Armenia CJSC is currently carrying out construction works. Construction activities at the Amulsar mine site resumed in July 2025.

### **3. Information Regarding the Biodiversity Study by the National Academy of Sciences of Armenia**

Within the framework of the contracts signed between the company and the A. Takhtajyan Institute of Botany of the National Academy of Sciences of Republic of

Armenia and the Scientific Centre of Zoology and Hydroecology of the National Academy of Sciences of Rrepublic of Armenia, field studies of the flora and fauna species and their habitats in the project area and adjacent territories were carried out in the current year. In addition, aquatic biodiversity monitoring was conducted in the Arpa, Vorotan, and Darb rivers.

The company will present the results of the conducted scientific research, as prescribed by law, by 20 February 2026.

#### **4. Regarding Measures to Reduce, Mitigate and Compensate the Potential Negative Impacts of the Mine**

The company has implemented a number of measures envisaged by the Environmental Impact Assessment (EIA) and Environmental and Social Impact Assessment (ESIA) processes. These measures were aimed at preventing, reducing, mitigating, managing, and, when necessary, compensating for the risks and impacts identified in the project area.

Those measures were developed and implemented in a systematic manner within the framework of relevant management plans, including:

- Land Use Management Plan for the project area
- Air Quality, Noise and Vibration Management Plan
- Environmental Monitoring Plan
- Cyanide Management Plan
- Solid Waste Management Plan
- Surface Water Management Plan
- Biodiversity Management Plan
- Biodiversity Action Plan
- Biodiversity Compensation Strategy
- Biodiversity Monitoring Plan, and other related documents.

Among the measures implemented in order to reduce and mitigate impacts on biodiversity within the affected and the adjacent territories, particularly noteworthy is the scientific research program to study a newly discovered population of *Potentilla porphyrantha* Juz. – a plant species covered by the Red Book of Armenia – in the Amulsar area, and a corresponding action plan for its translocation from the impact zone. This work was performed based on the 7 August 2015 contract with the Ministry of Environment "On the translocation of individuals of a new population of a plant species registered in the Red Book of Armenia" with joint participation of international experts, the National Academy of Sciences of Rrepublic of Armenia A. Takhtajyan Institute of Botany and the Cambridge University Botanic Garden of the UK.

With the joint efforts of staff from the National Academy of Sciences of Rrepublic of Armenia Scientific Centre of Zoology and Hydroecology, international specialists, and the company's own experts, monitoring of animal species in the Amulsar and adjacent areas has been carried out, focusing on species registered in the Red Book of Animals of

Armenia, such as Brown Bear (*Ursus arctos*) and Lesser Kestrel among other species that breed in the area, and measures have been implemented aimed at their conservation and at reducing the impact of the company's activities on these species.

### **5. Compensation Measures**

On 12 December 2016, a Memorandum of Understanding on the creation of a "Jermuk" National Park was signed between the Ministry of Environment and the company aimed at implementing measures envisaged for compensating biodiversity impacts. Under the obligations assumed by that MoU, the company carried out work on mapping the area, socio-economic assessment, study of plant and animal species and habitats.

However, because of the several developments, including war related events, these works were temporarily halted. Taking into consideration the fact that World Wildlife Fund, financed by the KfW Development Bank, in cooperation with the Ministry of Environment, is currently carrying out the work to establish the "Jermuk" National Park, respective discussions are under way to ensure the company's re-engagement in the further steps of the national park's creation.

### **6. Regarding the Emerald Network Revision Process**

We highly acknowledge the support received from the Bern Convention Secretariat in securing the involvement of all stakeholders in the review process of the candidate Emerald Network sites. Referring to the effectiveness of these discussions, we are ready to conduct such meetings on a more frequent basis. Furthermore, we would like to involve the complainant side in any scientific discussion relevant to this process and to conduct detailed discussions related to the comments submitted by the complainant side regarding the revision of the candidate Emerald sites.

We understand the concern of the Secretariat, while noting with regret the fact that the size reduction of the candidate Emerald sites is not the main issue. In this context, we would like to underline once more that the review of candidate Emerald sites certainly is not carried out with the purpose of their reduction in size. We have a crystal clear primary objective: to modify the boundaries of the candidate Emerald sites proposed in 2016 in order to ensure real representation of the relevant habitats. While it is true that the total area of candidate Emerald sites, which were submitted to the Bern Convention in 2016, has been reduced, in the case of the proposed revised candidate Emerald sites, areas with more accurate boundaries have also been obtained, but altogether new Emerald sites have been obtained and a number of candidate sites have even increased in size compared to those previously submitted. For example, the revised "Ijevan" (AM0000005) candidate Emerald site, which previously made up 47,593.10 ha, now comprises 49,499.42 ha, the revised "Jajur" (AM0000006) candidate site now makes up 3,057.40 ha from 1,711.20 ha, while the revised "Aragats" (AM0000010) candidate site covers 21,237.53 ha from 9,446.70 ha previously (cartographic information is attached in Annex). In this regard, it should be expressly noted that, for example, the modification of the boundaries of the three aforementioned areas, resulting in an increase in their overall surface, was carried out exclusively for the purpose of ensuring the conservation of the actual habitats of endangered species.

With regard the compensation mechanisms to be suggested after the overall area decrease, the above-mentioned works towards the boundary adjustments, the new candidate Emerald sites, and those sites whose areas are even increasing are to be emphasized.

### **7. Regarding the Process of Establishing "Jermuk" National Park**

As mentioned earlier, the Ministry of Environment and the Armenian branch of the World Wildlife Fund, financed by the KfW Development Bank, is implementing the program "Biodiversity and Sustainable Local Development in Armenia". One of the main components of this program is the creation of the "Jermuk" National Park. Within the framework of this program, an analysis of the species composition of high vascular plants and vertebrate animals registered in the Red Book of Armenia, which were found within the area of the proposed national park, was conducted, and the mapping of their distribution (habitats) was carried out. Based on the above-mentioned data, a schematic map of the proposed "Jermuk" National Park was developed.

Information on the categories of lands and types of ownership in the area has been received from the Cadastre Committee of the Republic of Armenia. Workshops were organized in the town of Jermuk with the participation of representatives of the Ministry of Environment, the Vayots Dzor Regional Administration, the Jermuk Municipality, the settlements of Jermuk community, non-governmental organizations operating in Vayots Dzor, and other stakeholders. During those discussions, the schematic map of the proposed national park was discussed, as well as possible programs aimed at the community's development.

Works on mapping for the "Jermuk" National Park are foreseen to start by the end of 2025, to be implemented by an organization with an appropriate mapping license. The following activities of the establishment procedure for "Jermuk" National Park completion of mapping works, adoption of the corresponding land allocation decision by the Community Council, preparation of the draft government decision and other legal documents are planned for 2026.

### **8. Regarding a Number of Assertions Made by the Complainant Organizations**

In this context, we wish to emphasize that our reports submitted so far addressed the matter. However, we must note once again that many of the facts continuously presented to the Convention Secretariat by the complainant side unfortunately do not correspond to reality or are not scientifically substantiated. In view of the above, we would like to briefly address several such points:

- The complainant side continually claims that, as a result of the revision of the "Jermuk" candidate Emerald site, the Amulsar section was removed from that site in order to allow mining. However, the land areas occupied by the company's facilities, including the actual mining area, overlap with only about 375 ha, constituting approximately 1.07% of the "Jermuk" candidate Emerald site (a

thematic map is attached in Annex). Moreover, the company is undergoing rigorous, enhanced scrutiny from the Government to ensure the protection of the environment consistent with Armenia's obligations under the Bern Convention and Armenian law.

- The complainant side claims that no information was provided during the meeting with Ministry representatives; however, during that meeting, which took place on 18 September, the Ministry's representatives indicated that mining operations would begin soon and that the relevant equipment was being moved to the site.
- The complainant side notes that the meetings held with Ministry representatives cannot be considered official, whereas in fact all such meetings were official in nature—intended to initiate dialogue with the complainant organizations—and all those meetings were covered on the official page of the Ministry of Environment at August 8.
- The complainant side states that there is a conflict of interest, since the biodiversity studies carried out in the area by the company were conducted by the same researchers from the National Academy of Sciences of Republic of Armenia Institute of Botany and Institute of Zoology who carried out the candidate Emerald site revisions. However, the National Academy of Sciences, through its scientific institutes, serves as the state's scientific advisory organization; accordingly, the participation of its researchers in the biodiversity studies is legitimate. In view of the above, we consider that there are no sufficient grounds to cast doubt on the professional competencies or qualifications of the experts.
- The complainant side demands that the new list of candidate sites included in the Emerald Network be supplemented with the areas of Jermuk and Gorhayk. In the revised list of sites, however, the name "Gorhayk" has simply been replaced with "Vorotan," since the new site covers not only Gorhayk but also adjacent areas. The revised "Jermuk" candidate Emerald site is already present in the list.
- The complainant side notes that during the construction works at Amulsar, one of the pipelines supplying the community of Gndevaz was damaged, as a result of which the community's water supply was interrupted. The company has stated that for the construction of roads and certain infrastructure it engaged contractors, and that over the course large-scale construction work, the pipeline was damaged for the third time. The pipeline is now repaired, and the water supply has been restored. The company also noted that it involves contractor companies only in construction works, whereas the mining operations will be carried out exclusively by the company's own specialists, in this context, we consider it important to note that, in that case, only road-construction works were carried out.
- The complainant side has stated that they appreciate the fact that dialogue with the Ministry of Environment has begun, at the same time, numerous unresolved issues remain, and they expect participatory and public open meetings. Acknowledging the complainant side's concern and recognizing the need to fulfill the obligations assumed under the Bern Convention, the Ministry convened a meeting on 18 September 2025 with representatives of the complainant organizations, during which among a number of key issues the issues related to the

report of proposals for the revision of Emerald Network candidate sites (developed in the framework of the site revision process) were discussed. At that meeting, as an interim solution, the Ministry's representative proposed a phased approach whereby the revised or newly proposed sites for which there are no fundamental objections would be submitted to the Convention Secretariat in stages.

The Ministry has presented three revised candidate Emerald Network sites mentioned under point 3 of this report (the Emerald Network revision section) to the non-governmental organizations and requested them to provide their subsequent remarks/positions on the mentioned issues. So far no response has been received.

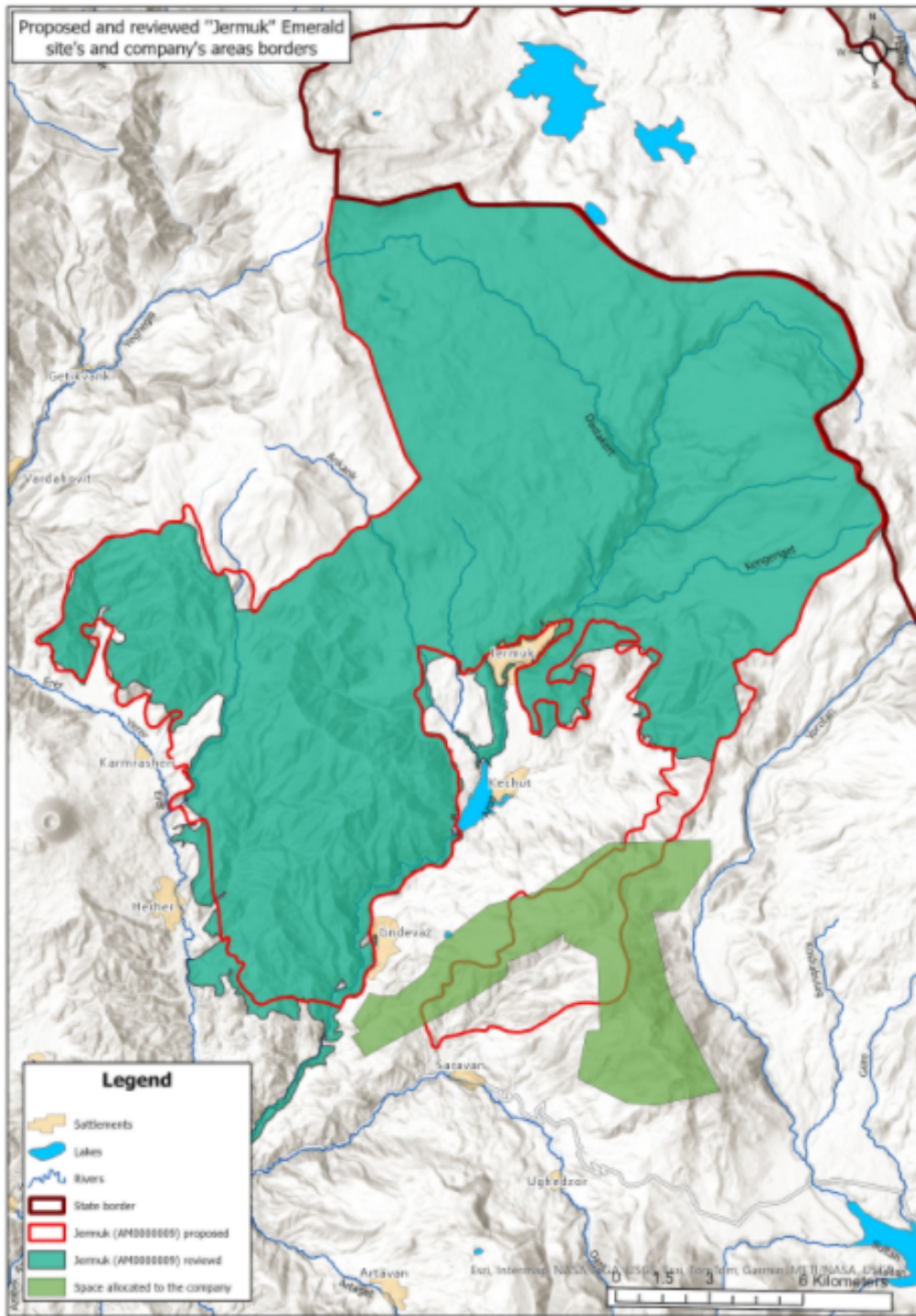
Republic of Armenia expresses its readiness to enhance constructive collaboration with all the stakeholders and reiterates its full commitment to continue the fruitful cooperation with the Bern Convention Secretariat.

Sincerely,

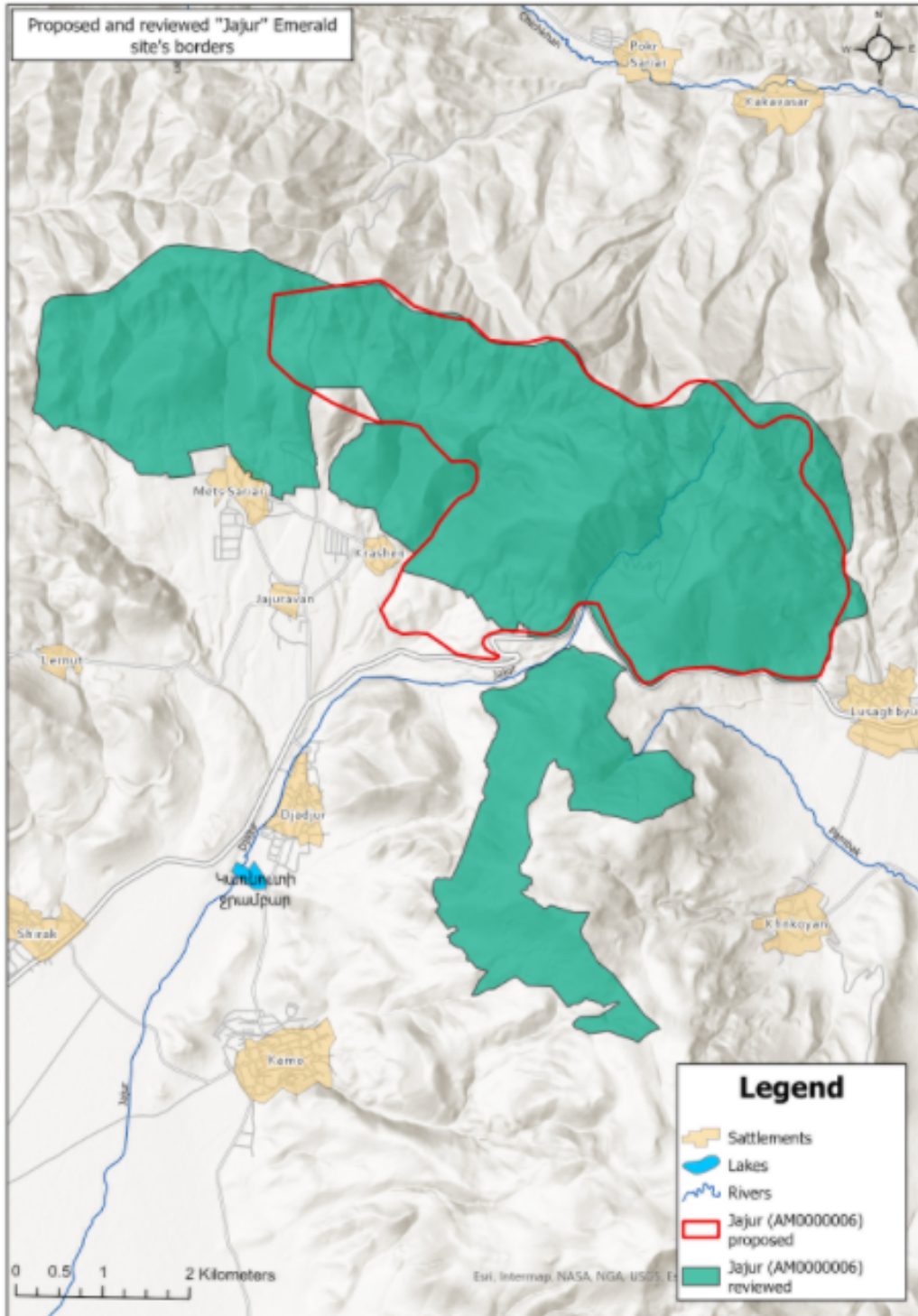
Mr. Aram Meymaryan

**Annex 1: Proposed and reviewed «Aragats» Emerald site's borders**

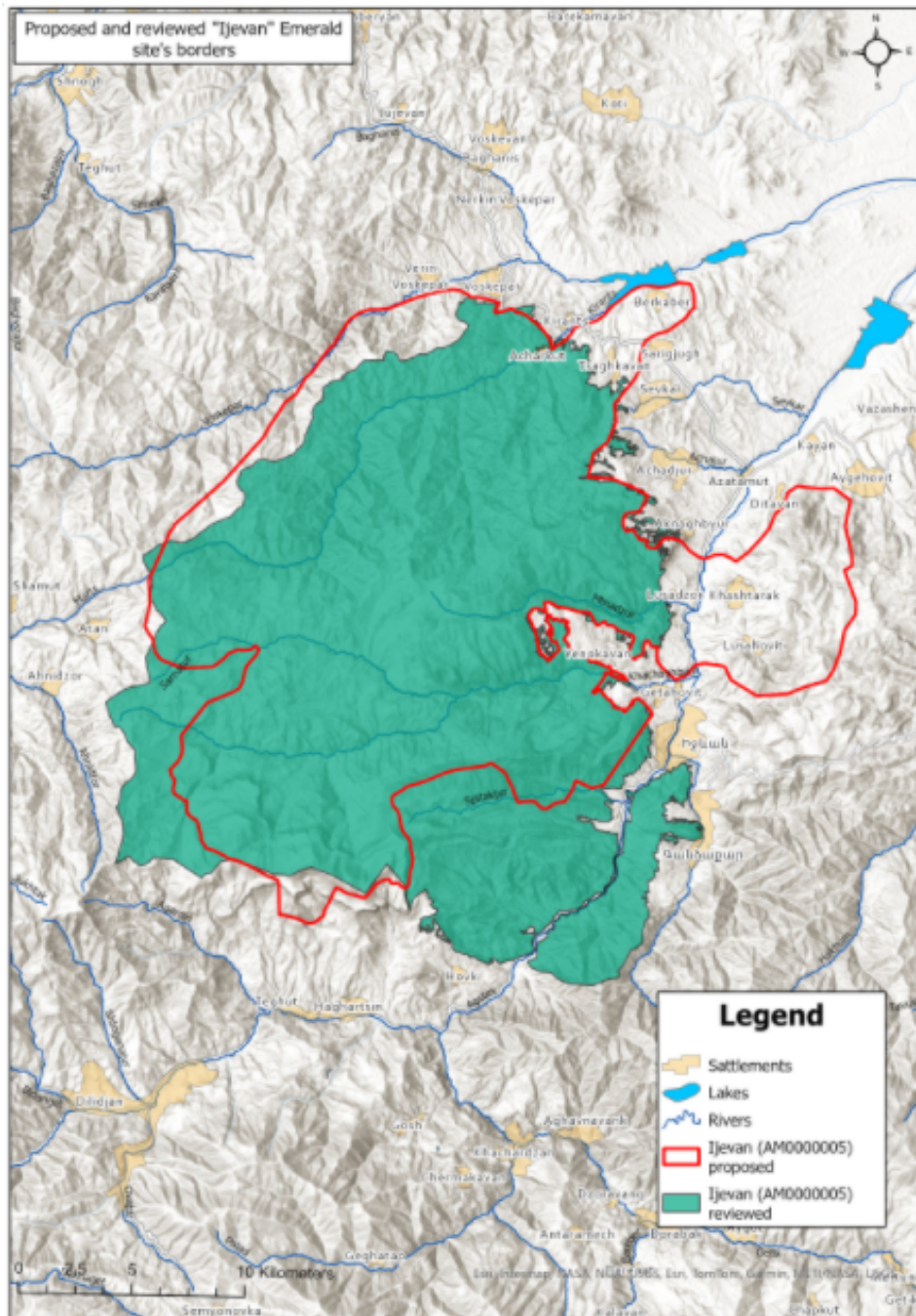




**Annex 3: Proposed and reviewed “Jajur” Emerald site’s borders**



**Annex 4: Proposed and reviewed “Ijevan” Emerald site’s borders**



**Update Report dated August 2025**



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REPUBLIC OF ARMENIA  
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To: Ms. Alessandra Siino  
Secretary of the Bern Convention  
e-mail: [bern.convention@coe.int](mailto:bern.convention@coe.int)  
Tel. +33(0)3 90 21 50 45

Dear Ms. Siino,

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 conveys its sincere congratulations on your recent appointment as Secretary of the Bern Convention wishing you every success in this important role. The Ministry is confident that your leadership will greatly contribute to the effective implementation of the Convention's objectives and strengthening of the ongoing cooperation in protecting biodiversity. With reference to the Secretariat's letter of 15 May 2025, the Ministry hereby submits a progress report addressing the points raised by the Bureau at its meeting of 8–10 April 2025 regarding the Amulsar gold mine project and the Emerald Network sites in Armenia, along with relevant updates on recent developments.

**Abstract**

This report provides an update on the status of the Amulsar gold mine project and related Emerald Network and biodiversity conservation efforts in Armenia, in response to the Bureau's conclusions of April 2025. While the Administrative Court of Armenia has confirmed the validity and non-revocability of the subsoil use permits issued for the project, the Government has taken significant steps to enhance environmental oversight. A detailed biodiversity study is being conducted by the National Academy of Sciences, with fieldwork initiated in April 2025. Monitoring results, including this study's findings, will be included in the quarterly environmental reports submitted by the company. Furthermore, to reinforce accountability, the Government has acquired a 12.5%

ownership stake in Lydian Armenia CJSC.

Armenia has also advanced the revision of its Emerald Network sites through a participatory process involving scientific institutions, ministries, and civil society, including complainant NGOs. Constructive dialogues were held in February and in July 2025 and public consultations are planned to finalize the proposed revisions.

In parallel, the establishment of Jermuk National Park is being prioritized as part of Armenia's national biodiversity strategy. The park's designation, also foreseen in the draft NBSAP and the national SPNA strategy, contributes to Armenia's efforts to meet the CBD 30x30 target. The initiative is now supported by the KfW-funded "Biodiversity and Sustainable Local Development in Armenia" program, and feasibility work is underway.

Through these actions, Armenia demonstrates its continued commitment to the Bern Convention, ensuring that biodiversity conservation is upheld alongside responsible development.

### **1. Regarding the request for a new Environmental Impact Assessment (EIA) and to suspend any permits for the exploitation of subsoil until the new EIA has been completed.**

In response to the Bureau's request to clarify the status of a new Environmental Impact Assessment (EIA) for the Amulsar gold mine project, as well as to suspend subsoil exploitation permits until such an assessment is conducted, the Government of Armenia wishes to provide the following consolidated update.

Under Armenian legislation, mining activities are subject to Environmental Impact Assessment and environmental expert review. The Amulsar gold-quartzite deposit development project underwent the relevant procedures, and in April 2016 the Ministry of Nature Protection approved the EIA submitted by Lydian Armenia CJSC. 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. The results of this review were shared with the National Academy of Sciences and relevant governmental bodies to ensure informed oversight.

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.

Nonetheless, the Government recognizes the ecological sensitivity of the area and is implementing precautionary oversight. Although the company holds valid permits, actual mining operations have not yet commenced. 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.

Additionally, the Armenian Government has taken institutional steps to strengthen oversight. In December 2024, the state acquired a 12.5% ownership stake in Lydian Armenia CJSC, enabling direct participation in company governance, including decisions with environmental implications. This move is intended to enhance transparency and accountability, particularly in environmental performance and stakeholder engagement.

In summary, while in light of the Administrative Court of Armenia's final decision the legal and procedural framework currently does not allow for suspension of the project or a new EIA to be mandated, the Armenian authorities are actively ensuring that environmental considerations, including those prompting the Government's own previous concerns with the project, are fully addressed through monitoring, scientific assessment, and strengthened institutional involvement. The Government remains committed to maintaining dialogue with all stakeholders and to complying with its obligations under the Bern Convention, including by keeping the Secretariat informed of further developments.

## **2. Progress of the Biodiversity Study by the Scientific Centre of Zoology and Hydroecology**

Recognizing the importance of recent biodiversity findings in the Amulsar area, the Ministry of Environment has prioritized a dedicated study to assess and verify these findings. This study is being carried out by the Scientific Centre of Zoology and Hydroecology of the National Academy of Sciences, in collaboration with the Institute of Botany of the NAS. The focus is to gather comprehensive, up-to-date data on the fauna and flora of the Amulsar site and its surroundings, especially for species of conservation concern that may not have been fully addressed in earlier assessments. In early 2025, discussions were initiated between Lydian Armenia and the aforementioned NAS institutes to define the Terms of Reference for an extensive biodiversity monitoring program. By the end of the first quarter of 2025, these preparations had advanced significantly. Lydian Armenia agreed to fund the research and engage national experts as independent consultants. The plan established that a contract with the Institutes of Zoology & Hydroecology and Botany would be signed by 31 March 2025, and that fieldwork would commence on 1 April 2025. Indeed, as of April 2025, field surveys and data collection have started in the Amulsar area under the guidance of the NAS scientists. The field teams are surveying a wide range of taxa, including mammals, birds, reptiles, amphibians, invertebrates, and plant communities, across different seasons and habitats in and around the project site.

Thus far, the Scientific Centre of Zoology and Hydroecology has been conducting regular field visits, collecting samples and observations to document the presence of key species. The study specifically aims to document any new or rare species (for instance, any Red Listed species or other species of European importance) that may not have been part of the original EIA. The involvement of academic experts ensures that the methodologies follow international best practices for biodiversity assessment. Coordination between the company and the scientific team is facilitated by the Ministry of Environment to guarantee the independence and credibility of the research. Importantly, the findings of this biodiversity study will be integrated into Lydian Armenia's mandatory monitoring reports. Under Government Decision No. 191-N (22 February 2018), mining companies must conduct continuous environmental monitoring and submit regular reports on the results. This upcoming report will reflect data from the ongoing biodiversity assessments, providing an initial public record of the study's results. It is expected to detail any significant observations made during the spring, summer and autumn 2025 fieldwork campaign, such as sightings of particular wildlife species, conditions of habitats, and any indications of changes in biodiversity status.

The comprehensive study by the Zoology and Hydroecology Centre is scheduled to continue through the 2025 field season, covering spring, summer, and autumn – critical periods for observing different species. The experts will then analyze the collected data and compile a report. The goal is to have a complete scientific report on the biodiversity of the Amulsar area by the end of 2025, which can inform both national authorities and the Bern Convention about the current state of species and habitats. Based on the results of this study, and in particular its findings on the presence of additional protected species or sensitive habitats, the Ministry of Environment will work with Lydian Armenia to develop or update mitigation and conservation measures accordingly. This could include habitat management plans, species-specific protection measures, or adjustments to mining operations to avoid or minimize impacts. In summary, the biodiversity study is well underway and represents a proactive approach by Armenia to further ground its decisions in scientific evidence. The collaboration with the Scientific Centre of Zoology and Hydroecology ensures that the latest scientific findings are integrated into the oversight of the Amulsar project, thereby addressing the Bureau's concern about recent biodiversity findings in the area.

### **3. Revision of the Emerald Network Sites in Armenia – Process and Stakeholder Involvement**

Armenia is revising its list of candidate Emerald Network sites under the EU4Environment program to enhance scientific accuracy and management feasibility. The initial 2017 list covered over 1 million hectares (34.8% of the national territory) but included overlaps with settlements, industrial zones, and areas current evidence suggests lack clear conservation value.

The revision process, led by the Ministry of Environment and supported by national and

international experts, involves refining boundaries, removing technically problematic areas, and proposing new ecologically significant sites. Several sites such as “Sevan” and “Jermuk” have undergone boundary adjustments; new candidate sites have also been proposed.

In 2025, three key stakeholder meetings were held. On 4 February, a technical discussion with ministries and scientific institutions reviewed proposals and resolved most technical issues. On 7 February, the Ministry met with complainant NGOs (EcoLur, Armenian Forests, Green Armenia) to discuss concerns, including the proposed exclusion of the Amulsar area from the Jermuk site.

On 28 July, the Ministry held a consultation meeting with representatives of the non-governmental organizations that had formally submitted a complaint—namely, “EcoLur” Informational NGO, “Forests of Armenia” NGO, and “Green Armenia” Environmental NGO. The meeting was also attended by a representative of the international organization “CEE Bankwatch Network,” acting on behalf of the aforementioned NGOs, along with other concerned environmental civil society organizations and international experts. Photographs from the meeting are enclosed in the annex.

The meeting served as a platform for open dialogue between the Ministry and civil society stakeholders, aimed at discussing the issues raised in the complaint and ensuring transparency, inclusiveness, and constructive engagement in the decision-making process regarding environmental matters of public concern. The discussions were constructive. It was agreed to continue dialogue, consider civil society input in final decisions, and organize broader public consultations before submission. NGO representatives are also involved in national biodiversity planning, including COP17 preparation, underscoring an inclusive approach.

The revision process remains ongoing, with the aim of ensuring that the updated list of candidate sites reflects the highest possible level of national consensus. Armenia remains committed to maintaining a high sufficiency index and intends to submit a revised site list for evaluation at a future biogeographical seminar, once the internal coordination process has reached an adequate stage of completion.

#### **4. Relationship Between Jermuk National Park Designation and the Amulsar Mine Project (Including the KfW-funded Initiative) and official Positions of the Government and Stakeholders on the Creation of Jermuk National Park**

The Government of Armenia remains firmly committed to the expansion and effective management of specially protected nature areas (SPNAs), recognizing their critical role in safeguarding biodiversity and contributing to international conservation goals. The establishment of Jermuk National Park, alongside Tatev National Park, has been officially identified by the Government as a national priority within both the National Biodiversity Strategy and Action Plan (NBSAP) and the Strategy for the Development of Specially Protected Nature Areas (which was approved in 2014). These designations are considered necessary for ensuring habitat connectivity, protecting unique mountain ecosystems, and contributing to the country's global commitments, particularly under the 30x30 target of the Convention on Biological Diversity (CBD).

Originally, the initiative to establish Jermuk National Park emerged before the

development of the Amulsar gold mine project. A Memorandum of Understanding signed in 2016 between the Ministry of Environment and Lydian Armenia set the foundation for future collaboration, including the collection of baseline ecological data in 2017–2018. However, progress was delayed following the suspension of mine-related operations.

In 2025, the Ministry of Environment reinvigorated the Jermuk National Park process as an independent policy priority, decoupled from mining timelines. With financial and technical assistance from the KfW Development Bank, the Government launched a dedicated component under the “Biodiversity and Sustainable Local Development in Armenia” program to carry out feasibility studies, stakeholder consultations, and ecological assessments. Fieldwork and consultations are currently underway, with the goal of preparing a robust legal and scientific proposal for the park’s designation.

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 creation of the park is viewed not only as an instrument of biodiversity conservation but also as a tool for regional sustainable development, particularly eco-tourism in the Vayots Dzor region.

The official position of the Government of Armenia is consistently supportive of the establishment of Jermuk National Park. As explicitly stated in the draft NBSAP, both Jermuk and Tatev are listed as necessary future national parks, reinforcing the country’s intention to enhance ecological representativeness in its protected areas network. These objectives are also reflected in national reporting under the CBD and other multilateral environmental agreements. The Ministry of Environment is coordinating the process through an inter-institutional framework, aligning ecological goals with community development needs and international standards.

Local authorities and communities in Jermuk welcome the initiative as an opportunity for eco-tourism, employment, and preservation of their natural heritage, provided their traditional land uses are respected and supported.

Environmental NGOs, including complainants to the Bern Convention, strongly advocate for the park’s establishment and insist on the inclusion of Amulsar mountain due to its ecological significance. They continue to contribute data, public awareness efforts, and technical recommendations.

Lydian Armenia, the mine operator, maintains that it supports the creation of the park in principle, so long as mining rights and permitted activities are not impeded. The company has expressed willingness to cooperate on mitigation, infrastructure, and potential post-mining ecological restoration.

International partners, particularly KfW and WWF Caucasus, view the park as a flagship opportunity for Armenia to demonstrate leadership in biodiversity conservation, sustainable land management, and CBD target implementation.

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. Broader public discussions and ecological zoning work are also planned as part of this participatory process.

Sincerely

Aram Meymaryan

Hakob Matevosyan

National Coordinator of the Convention on the Conservation of European Wildlife and Natural Habitats.

**Appendix 1:** 28 July 2025, the Ministry held a consultation meeting with representatives of the non-governmental organizations









**Update Report dated February 2025**



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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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0010, ք.Երևան, Հանրապետության հր., Կառավարական տուն 3  
3 Government Bld., Republic Sq., Yerevan, Armenia, 0010  
0010, Армения, г.Ереван, Пл. Республики, Дом Правительства 3  
✉ 10010608@e-citizen.am | minenv@env.am | www.env.am  
☎ +374 11 818 501 | 📠 +374 11 818 506

