



Strasbourg, 14th May 2025

T-PVS/Files(2025)2024-4_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

45th meeting

Strasbourg, 8-12 December 2025

Bureau of the Standing Committee

Autumn 2025

Strasbourg

New complaint: 2024/4

**Alleged threat to protected bird species due to drying of settling
lagoons in Mia Millia/Haspolat (Cyprus)**

- COMPLAINT FORM -

*Document prepared by
Society for Protection of Birds and Nature (KUŞKOR)*

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM INSTRUCTIONS:

NB: Submitting a complaint to the Bern Convention is a serious accusation against the concerned Contracting Party(ies). Complaints must demonstrate a sufficient degree of seriousness or urgency related to species or habitats of European importance, and the complainant must demonstrate that the issue has already been raised at local and/or national level.

Complaint forms must be submitted in electronic word format, in English or French, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis. Anonymous complaints are not admissible; however the Secretariat will take measures to keep the personal details of the complainant confidential.

Please, fill in this form and send it to the attention of:

Bern Convention Secretariat

Directorate of Democratic Participation

Council of Europe

F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name: Robin

Surname(s): Snape

On behalf of (if applicable): Society for Protection of Birds and Nature (KUŞKOR)

Town/City: Nicosia

County/State/Province: Nicosia.

Postcode: 99150

Country: Cyprus (TC community)

E-mail: r.t.e.snape@exeter.ac.uk

Website: www.kuskor.org

Date: 18th September 2024

Electronic Signature:

1. Please state the reason of your complaint (refer also to the Contracting Party/ies involved and the Articles of the Convention which might be violated)

During the last decade, the United Nations Development Programme (UNDP Cyprus), with EU funds that are administered via the EU's Aid Package for Turkish Cypriot Community, have been implementing a series of projects valued at tens of millions of euros at the Mia Millia (Haspolat) water treatment plant in Nicosia. This site is integral to an Important Bird and Biodiversity Area which KUŞKOR and Birdlife Cyprus supported the designation of in 2014, a key result of Civil Society support grant from EU that delivered research in 2010 – 2013.

This website contains the criteria met for the designation of the IBA: [Mia Milia Sewage Treatment Plant \(Cyprus\) - BirdLife IBA factsheet](#). Three of the four IBA trigger species are entirely dependent on the settling pools of the Mia Millia water treatment facility in its former state. It should be noted that during the years following this designation, KUŞKOR and Birdlife Cyprus have collected further data to support the conservation status of the site as an IBA. The site regularly holds the greatest number (many thousands) and diversity of wintering waterbirds of any wetland site on the whole of Cyprus.

In 2014, KUŞKOR were concerned with the potential impacts of the New Nicosia Waste Treatment Facility. However, due to a lack of stakeholder engagement, civil society organisations were not called to express an opinion or contribute data. Accordingly, we prepared the attached document and presented a printed copy of this to EU during the inauguration of the project in 2014.

In 2017 the EU-funded project began to dry these pools, the largest permeant water body area on the island. They now exist at around a third of their previous size. Subsequently, around half of the dried wetland site has been converted by the Nicosia Turkish Municipality into an open dump site for mixed domestic waste, and this is regularly set on fire. Further separation and drying is now beginning.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention that are potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

The list includes but is not restricted to the following regular visitors/residents listed on Appendix II of the Bern Convention: *Egretta garzetta*, *Nycticorax nycticorax*, *Platalea leucorodia*, *Oxyura leucocephala**, *Tadorna ferruginea*, *Charadrius dubius*, *Vanellus vanellus*, *Hoplopterus (Vanellus) spinosus**, *Calidris ferruginea*, *Calidris minuta*, *Tringa glareola*, *Tringa hypoleucos*, *Tringa ochropus*, *Tringa stagnatilis*, *Himantopus himantopus**, *Glareola pratincola*, *Glareola nordmanni*, *Chlidonias hybrida*, *Chlidonias leucopterus*, *Gelochelidon nilotica*, *Apus melba*, *Alcedo atthis*, *Merops apiaster*, *Coracias garrulus****, *Hirundo rustica*, *Riparia riparia*, *Delichon urbicum*, *Motacilla cinerea*, *Motacilla citreola*, *Motacilla flava*, *Remiz pendulinus*, *Emberiza schoeniclus*. Additional protected/IUCN redlisted species of note are: *Aythya ferina***, *Netta rufina***, *Aythya nyroca***, *Mauremys caspica* (likely the most important site on the island).

*Formally recognised IBA trigger species; **Potential IBA trigger species.

3. What might be the negative effects for the specie/s or habitat/s concerned?

Already, due to this EU-funded work, these species have lost more than half of the available habitat. Fewer refuges are available and the birds are likely to desert the site. Fewer breeding opportunities exist. The entire site and all the birds may be lost and/or heavily impacted further without the correct management systems/project performance standards. Further drying is now beginning and this should be halted until actions can be agreed with local stakeholders to offset biodiversity impacts.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald Network, UNESCO site? Are there pending procedures within another international institution?

The site is a globally recognised IBA and should therefore be treated as a potential Natura 2000 site. Many of the species present are protected by the CMS/Bonn Convention and are on Annex I of the EU Birds Directive.

5. Have you attempted to address this issue with the relevant local and national authorities? Please describe. Are there any pending procedures at national level regarding the object of your complaint?

We attended an Environmental Impact Assessment meeting in Haspolat village attended by the Department for Environmental Protection and made comments during the meeting, citing our concerns. We attended an online stakeholder meeting and presented our concerns through a powerpoint presentation. We gave written report to the EU project representatives. In our [annual report](#) we have recommended that the site become a nationally recognised SEPA, that remaining habitat should be promoted through management for birds and that equivalent wetland should be created on the river, to offset the ongoing habitat loss, through the EU-funded destruction of the wetland and subsequent conversion of the site to landfill. We met with the Nicosia Turkish Municipality on many occasions in recent years, including site visits. The national authorities KUŞKOR work under are not recognised by the international community and operate outside of global conventions. Local biodiversity conservation regulations are inadequate in this case and the EU must insist that EU standards are met in planning this work, but they are not. The territory is considered an occupied area of the Republic of Cyprus and European Union. However, the work is undertaken with financial support of the EU, who are the relevant signatory to the Bern convention in this case. The project has become a source of great concern and distain to local naturalists and CSOs and is a poor example to industry/developers in Cyprus, that a project with regional governance backing is proceeding in this way.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc) (for large files, please add a separate annex document, as mentioned in the above instructions)

An Environmental and Social Impact Assessment was apparently made. As part of this, a local marine biologist working on the report approached KUŞKOR for data which we provided freely. The EIA has not been made available to KUŞKOR. According to global development standards (eg [IFC Performance Standard 6](#)), as an Internationally Recognised Area of biodiversity importance an Environmental and Social Impact Assessment, and Critical Habitat Assessment are needed, including like-for-like offsetting, net gains, and restoration. These are beyond what is required by the national authorities, who have avoided recognising the status of the IBA and failed to incorporate it into their national network of Specially Environmental Protected Areas. It is unclear what standards are being adhered to regarding the management of risk to wildlife at the site, and social risk (loss of natural heritage), but clearly, drying out the site and converting it to landfill to be burnt is not the best course of action for this globally important wetland and these lost habitats should be replaced, with full engagement of experts actively working at the site through established national monitoring programmes of Birdlife Cyprus and KUSKOR.