



Strasbourg, 14<sup>th</sup> May 2025

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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**

45th meeting

Strasbourg, 8-12 December 2025

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**Bureau of the Standing Committee**

Autumn 2025

Strasbourg

**New complaint: 2025/4**

**Alleged habitat destruction in the Osokorky Meadows Reserve due to  
proposed transportation network constructions**

**- COMPLAINT FORM -**

*Document prepared by  
Ecopark Osokorky*

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**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](mailto:Bern.convention@coe.int)

First name: Oleksandr

Surname(s): Pylypenko

On behalf of (if applicable): NGO «Ecopark Osokorky»

Town/City: Kyiv

County/State/Province: -

Postcode: 02095

Country: Ukraine

E-mail: [ecopark.osokorky@gmail.com](mailto:ecopark.osokorky@gmail.com)

Website: <https://www.facebook.com/ecoparkosokorky>, <https://eo.org.ua>

Date: 02.04.2025

**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)**

There is a threat of damage or destruction to numerous species of flora and fauna, as well as natural habitats protected under the provisions of the Bern Convention, within the territory of the protected area—the «Osokorky Meadows» landscape reserve, located in the city of Kyiv, Ukraine. The reserve is a habitat for numerous protected species. Its territory is part of the left-bank floodplain of the Dnipro River and belongs to the Dnipro Ecological Corridor and the ecological network of Kyiv and Kyiv region. Migratory birds, primarily wading birds, use this area as a resting and feeding site during seasonal migrations.

Despite its high natural value and importance for biodiversity conservation, the «Osokorky Meadows» landscape reserve is currently facing a serious threat. Yes, a development company (**Kontaktbudservice LLC**), supported by the city authorities, is lobbying for the construction of a transportation network consisting of two six-lane roads that would pass through protected areas. The project involves large-scale construction, which would result in the destruction of valuable natural habitats, including wetlands, marshy thickets, and meadow ecosystems, leading to the disappearance of rare species of flora and fauna.

The development company justifies the need for roads through the designated area by the necessity to implement its own commercial projects for real estate development within the city of Kyiv. At the same time, the developer claims that a condition for the realization of the road construction project is the revocation of the reserve's status as a protected area, as voted by the relevant decision of the local government body—the Kyiv City Council. On October 29, 1996, Ukraine ratified the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) of 1979, becoming a contracting party.

The revocation of the reserve's status and the construction of the transportation network violate Articles 1, 2, 3, 4, and 5 of the Convention.

**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 of species and habitats affected was compiled with the involvement and based on the work of many scientists, including Mykola Prychepa (PhD, Institute of Hydrobiology of the NAS of Ukraine), Yulia Kovalenko (PhD, Institute of Hydrobiology of the NAS of Ukraine), Lesya Zub (PhD, Institute of Evolutionary Ecology of the NAS of Ukraine), Volodymyr Horobchishyn (PhD, Institute of Evolutionary Ecology of the NAS of Ukraine), Nataliya Pashkevych (PhD, M.G. Kholodny Institute of Botany, NAS of Ukraine), Anna Kuzemko (PhD, M.G. Kholodny Institute of Botany, NAS of Ukraine), and Vitaliy Kazannyk (PhD, Institute of Biology and Medicine, Kyiv National Taras Shevchenko University).

- The species affected are listed in Appendices I and II and Resolution 6 of the Bern Convention:
- Plant species: . *Salvinia natans*; *Trapa natans* (Annex 1);
- Birds: *Podiceps ruficollis*, *Podiceps auritus*, *Nycticorax nycticorax*, *Ixobrychus minutus*, *Falco subbuteo*, *Falco tinnunculus*, *Porzana porzana*, *Crex crex*, *Chlidonias niger*, *Chlidonias hybrida*, *Chlidonias leucopterus*, *Sterna hirundo*, *Alcedo atthis*, *Oriolus oriolus*, *Troglodytes troglodytes*, *Phoenicurus ochruros*, *Erithacus rubecula*, *Panurus biarmicus*, *Carduelis carduelis*, *Emberiza citrinella*, *Emberiza schoeniclus*, *Merops apiaster*, *Luscinia luscinia*(Annex 2); *Milvus migrans*, *Lanius minor*, *Circus gallicus*, *Circus pygargus*, *Circus aeruginosus*, *Luscinia svecica* (Resolution 6);
- Most of the bird species from this list are nesting within the territory of the «Osokorky Meadows» landscape reserve. The remaining species nest in the surrounding areas.
- Mammals (Microchiroptera): *Vespertilio murinus*, *Myotis daubentonii*, *Nyctalus noctula* (Annex 2) ;
- Amphibians: *Rana arvalis*, *Bombina bombina*, *Triturus cristatus* (Annex 2) ;
- Reptiles: *Lacerta agilis*, *Emys orbicularis* (Annex 2);
- The affected habitats are listed in Resolution 4 of the Bern Convention:
- Natural Habitats: C1.32 Free-floating vegetation of eutrophic waterbodies; C1.33 Rooted submerged vegetation of eutrophic water bodies; C2.33 Mesotrophic vegetation of slow-flowing rivers; C2.34 Eutrophic vegetation of slow-flowing rivers; D5.2 Beds of large sedges normally without free-standing water; E2.2 Low and medium altitude hay meadows; E3.4 Moist or wet eutropic and mesotrophic grassland; E5.4 Moist or wet tall-herb and fern fringes and meadows; F9.1 Riverine scrub; G1.11 Riverine *Salix* woodland (The list of habitats from Resolution No. 4 of the Bern Convention).

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

As a result of the revocation of the landscape reserve's status as a protected area and the implementation of large-scale construction of the transportation network with two roads, unique natural habitats will be destroyed, which serve as a home for protected species of flora and fauna, the list of which is provided in section 2 of this complaint. The powerful transportation network will divide the territory of the landscape reserve into separate parts. This will lead to significant environmental consequences across the entire area: the hydrological regime will be disrupted, causing the drying up of wetlands, and noise and air pollution levels

will increase, worsening conditions for wildlife. The natural habitats of protected species will be destroyed or irreversibly degraded. This will lead to the destruction of species of flora and fauna protected by the Bern Convention, particularly those unable to move quickly over long distances in search of new habitats. At the same time, birds and other wildlife will lose their habitats and be forced to move to other areas, less suitable for life, which will inevitably result in a decline in their populations.

**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?**

Bird species that are subject to the provisions of Agreement on the Conservation of African-Eurasian Migratory Waterbirds (Convention on the Conservation of Migratory Species of Wild Animals): Podiceps grisegena (Annex 2, BC), Ixobrychus minutus (Annex 2, BC), Porzana porzana (Annex 2, BC), Porzana parva (Annex 2, BC), Chlidonias niger (Annex 2, BC), Chlidonias hybrida (Annex 2, BC), Sterna hirundo (Annex 2, BC), Sternula albifrons (Annex 2, BC), Limosa limosa, Bucephala clangula, Numenius arquata, Gallinago gallinago, Lymnocyptes minimus, Tringa totanus, Anas platyrhynchos, Cygnus olor, Fulica atra, Philomachus pugnax, Anas crecca.

Mammal species (Microchiroptera) that are subject to the provisions of Agreement on the Conservation of Populations of European Bats (Convention on the Conservation of Migratory Species of Wild Animals): Vespertilio murinus (Annex 2, BC), Myotis daubentonii (Annex 2, BC), Nyctalus noctula (Annex 2, BC).

Species protected by the Red Book of Ukraine (a list of rare species, protected at the national level):

- Plants: Dactylorhiza incarnata, Iris sibirica, Salvinia natans (Annex 1, BC), Trapa natans L (Annex 1, BC);
- Birds: Milvus migrans (Resolution 6, BC), Circus pygargus (Resolution 6, BC), Circaetus gallicus (Resolution 6, BC), Lanius excubitor, Mareca strepera, Sternula albifrons, Limosa limosa, Podiceps auritus;
- Mammals (Microchiroptera): Vespertilio murinus (Annex 2, BC), Myotis daubentonii (Annex 2, BC), Nyctalus noctula (Annex 2, BC);
- Amphibians: Triturus cristatus (Annex 2, BC);
- Insects: Xylocopa valga, Aromia moschata, Sphex funerarius;

The territory of the left-bank floodplain of the Dnipro River near Kyiv, a small part of which is the «Osokorky Meadows » protected landscape area, has the status of a 'proposed site' for inclusion in the European Emerald Network. Due to the onset of the Russian-Ukrainian war, the process of designating this area as part of the Emerald Network was temporarily suspended. The process of recognizing this area as a Ramsar-protected wetland of international significance is ongoing.

**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?**

The public organization "Ecopark Osokorky" has appealed to the Office of the Prosecutor General of Ukraine, requesting involvement in the court case for the protection of the «Osokorky Meadows» protected landscape area. The public organization "Ecopark Osokorky" is participating in the court case filed by the development company to revoke the reserve's status, defending this valuable natural area.

The public organization "Ecopark Osokorky" is communicating with the Kyiv City Council, which is a party to the court case, to discuss a joint strategy for protecting the reserve.

We engage specialists, appeal to relevant authorities, and initiate and implement numerous measures aimed at preventing the development of this natural area.

**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)**

The area designated for the transportation network is a lowland that is partially flooded by spring floodwaters. Due to this, the planned road construction will involve embankments 6–7 meters high. The large-scale construction process itself will result in the destruction of habitats of protected species. Moreover, the presence of a major transportation network will make it impossible to maintain the protection regime of the area.

The transportation network threatens not only the «Osokorky Meadows» protected landscape area but also the entire left-bank floodplain of the Dnipro River near Kyiv, which covers approximately 2,000 hectares. The construction will inevitably lead to the irreversible degradation of the floodplain areas and the destruction of habitats for many protected species.

As of today, an environmental impact assessment for the construction of the transportation network has not been conducted.

However, the developer is lobbying for the revocation of the reserve's status, arguing the need to build roads specifically on this valuable natural area, which indicates their intention to further develop the territory for purely commercial purposes.

## Annex



*Location of the «Osokorky Meadows» landscape reserve on the map of Kyiv. The contours of the reserve on the satellite map*

The «Osokorky Meadows» landscape reserve is a 148-hectare nature reserve located in the southeastern part of Kyiv, on the border with the region. It borders on another nature reserve, the 137-hectare Tyahle Lake landscape reserve. Both reserves are part of a single natural complex - the left-bank floodplain of the Dnipro River in the vicinity of Kyiv, with a total area of approximately 2000 hectares. The area is characterized by perfectly preserved natural habitats and rich biodiversity. Work is underway to include the area in the Emerald Network of Europe and recognize it as a wetland of international importance (RAMSAR).



*The contours of the landscape reserve on the image from a copter*

But despite the high natural value and importance of the reserve for the city, a developer company that leases land in the neighborhood is trying to cancel the nature conservation status of the area and liquidate the reserve through the courts. They claim that the existence of the reserve hinders the construction of a powerful six-lane highway network and the realization of their private business interests



*Plans for the construction of a transportation network through the landscape reserve.*

All the photos below of natural landscapes and birds were taken on the territory of the «Osokorky Meadows» nature reserve



*Photo by Serhii Lubchenko*



*Photo by Serhii Lubchenko*



*Photo by Oksana Dmytrovska*



*Podiceps auritus* (photo by Mykola Pryshchepa)  
Protected by the Annex 2 of the Bern Convention



*Chlidonias leucopterus* (photo by Mykola Pryshchepa)  
Protected by the Annex 2 of the Bern Convention



*Chlidonias hybrida* (photo by Mykola Pryshchepa)  
Protected by the Annex 2 of the Bern Convention



*Chlidonias niger* (photo by Mykola Pryshchepa)  
Protected by the Annex 2 of the Bern Convention



*Lanius minor* (photo by Mykola Pryshchepa)  
Protected by the Resolution 6 of the Bern Convention



*Crex crex* (photo by Mykola Pryshchepa)  
Protected by the Annex 2 of the Bern Convention



*Milvus migrans* (photo by Mykola Pryshchepa)  
Protected by the Resolution 6 of the Bern Convention



*Mareca strepera* (photo by Mykola Pryshchepa)  
Protected by the Ukrainian Red Book (a list of species  
protected at the government level)



*Numenius arquata* (photo by Serhii Malomuzh)  
Protected by the AEWa Agreement



*Limosa limosa* (photo by Serhii Malomuzh)  
Protected by the AEWa Agreement and the Ukrainian Red  
Book