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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

40th meeting
Strasbourg, 1-4 December 2020

Other Complaints:

**Presumed threats to Emerald Network sites
“Olmanskiye bolota” (BY0000012) and “Topila Bog”
site (BY0000083)
(Belarus)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
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Report of environmental non-governmental organizations on threats and factsheet in the territory of Olmany/Almany mires (Emerald Network sites Olmanskiye bolota (BY0000012) and Topila Bog (BY0000083)).

Prepared by Brest Regional Branch of APB-BirdLife Belarus and NGO Bahna.
(Compiled - December 2019)

Olmany mires (or Almany mires if transliterated from belarusian; *Olmanskiye bolota* (BY0000012) and *Topila Bog* (BY0000083)) is one of the most renowned and significant natural sites in Belarus. It is a Nature reserve of national significance, Ramsar site, IBA, Biosphere reserve (national legislation), part of planned UNESCO Biosphere reserve and UNESCO World Heritage Site.

In the last decade (2010-2019) Olmany mire faced massive increase in infrastructure development. The following infrastructure is being constructed and planned.

- Roads with improved surface
- Sand pits
- Border control infrastructure
- Water ponds
- 35 kV power line (planned in 2020)

Over the last 5 years all construction projects of infrastructure development on the territory of Olmany were conducted with the violation of law. Violations were discovered by the NGOs and only after letters from activists and media publications authorities began to conduct inspections that confirmed the facts of violations. In accordance with the methodology approved by the national regulatory legal acts, the amount of damage from the revealed violations is measured in millions of USD.

Roads.

The process of road and other infrastructure construction at Olmany is characterized by extremely poor law enforcement and lack of due concern, despite extremely high scale of transformations and risks of irreversible environmental damage.

In particular:

- Public hearings for Forest roads #1, #2 and #3 were not duly held.
- Public discussions procedure for Forest road #4 was violated and public hearings suspended following a public complaint. The process is frozen at the moment.
- Environmental Impact Assessment (EIA) for Forest road #3 was implemented at a very low scientific level and became the subject of criticism from scientific and conservation community.
- EIA for border control sand line and roads were not publicly discussed at all since they contained classified information and probably were of the same low standard.
- Eventually, all sand excavation sites were either misused or established without due authorization. Several criminal cases were open after public campaign and complaint.



Picture 1. Forest road #3 traversing pristine raise bog during construction.

The total length of roads that have been recently constructed at Olmany exceeds 100 km.

Table 1. List of roads and other linear structures constructed at Olmany mires during 2010-2019.

Type of linear structure	Estimated length, km	Years of construction
Already built:		
Forestry road No 1	26	2018 -
Forestry road No 2	21	
Forestry road No 3	23	
State border committee roads	40	2016-2019
Border control sand line and road	26	
At different stages of planning:		
Forestry road No 4 (engineering design completed)	19	
Forestry road No 5 and 6 (planned)	25	
Border control line (planned)	22	

State border.

A particular threat to integrity of the site is the development of state border control infrastructure, which heavily fragments the site and affects hydrology of the area. This is a new threat as the state border is currently being established. This happens without public discussion.



Picture 2. State border infrastructure. Illustrative picture from official sources. Actual pictures of border infrastructure at Olmany are not available as it is considered as classified.

Apart from habitat destruction and fragmentation, construction of linear structures at Olmany involves destruction of unique dunes as they are dug out for sand.

Table 2. List of dune excavation sites, established to provide material for construction of roads and other linear structures at Olmany mires (2010-2019)

Site №	Forestry enterprise, region	Estimated area, ha	Opened	Comments
1.	Palieski, Brest	1.97	2015	Excavations 2 times exceeded authorized area. Criminal case opened following public complaint.
2.	Palieski, Brest	3.73	2017	Excavations 4 times exceeded authorized area. Criminal case opened following public complaint.
3.	Palieski, Brest	3.67	2017	Unlawful authorization of excavation. Excavations 3 times exceeded [unlawfully] authorized area. Excavation Criminal case opened following public complaint.
4.	Palieski, Brest	1.97	2017	Illegal excavation. Criminal case opened following public complaint.
5.	Palieski, Brest	1.83	2017	Illegal excavation. Criminal case opened following public complaint.
6.	Palieski, Brest	0.29	2015	Illegal excavation. Criminal case opened following public complaint.
7.	Palieski, Brest	1.54	before 2012	Illegal excavation. Criminal case opened following public complaint.
8.	Palieski, Brest	1.22	2013	Illegal excavation. Criminal case opened following public complaint.
9.	Palieski, Brest	0.37	2012	Probably illegal excavation, information was about legality was omitted in official reply.

			2012	Probably illegal excavation, information was about legality was omitted in official reply.
10.	Palieski, Brest	0.10		
	Milaševicki,		2018	Unlawful authorization of sand excavation.
11.	Homiel	2.12		
	Milaševicki,		2017	Unlawful authorization of sand excavation.
12.	Homiel	2.59		



Picture 3. A natural dune at Olmany and what remains after sand excavations.

Emerging threats

Water ponds.

A system of up to 10 water ponds for fire control and use of sand for construction of forest roads is planned by local forestry enterprise in the southern part of the mire. These ponds are usually established at elevated points so that as much sand as possible can be taken for road construction and maintenance. This approach leads to a situation when there will be no water in the created ponds on the hills (including among the dunes) in the dry season, since the ponds will quickly dry out. If these are fire protection ponds, they should be created in the lowlands near swamps or in the middle of swamp, where water will be even on dry days.



Picture 5. Map of planned water ponds and one of the ponds already established at Olmany.

Power lines.

Over 20 km of powerlines are planned for construction in the southern part of Olmany mires in order to supply electricity to border guard stations along the state border with Ukraine. The project is undergoing State expertise and Environmental impact assessment.



Picture 6. Illustrative picture – a similar 35 kV power line is planned for construction at Olmany

However, according to alternative impact assessment, prepared by representatives of several belarusian non-governmental organizations, a number of factors were not taken into account during preparation of EIA, which makes assessment of the impact and the choice of technical solution not accurate.