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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

**Habitat destruction in Mersin Anamur Beach
(Turkey)**

- COMPLAINT FORM -

*Document prepared by
Kazdagi Association for The Preservation of Natural and Cultural Assets, Turkey*

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



COMPLAINT FORM

NB: Complaint forms must be submitted in electronic word format, 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.

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

Iva OBRETENOVA

Directorate of Democratic Governance, Culture and Diversity

Council of Europe

F-67075 Strasbourg Cedex

E-mail: Iva.OBRETENOVA@coe.int

First name:..Süheyla

Surname(s) Dogan Unal.....

On behalf of (if applicable): Kazdagi Association for The Preservat,on of Natural and Cultural Assets.

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Date : 05.11.2019

Electronic Signature

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

The compliant stated hereby is on inundation of habitats and breeding//feeding/foraging areas of species given within Annexes of the Convention by the Republic of Turkey.

The subjects of the complaint are:

(i) The destruction of key breeding/feeding and foraging grounds of Annex II species namely; Egyptian Vulture *Neophron percnopterus*, Griffon Vulture *Gyps fulvus*, Lesser Kestrel *Falco naumanni*, European Roller *Coracias garrulus*, Bonelli's Eagle *Hieraetus fasciatus*, Cinerous Bunting *Emberiza cineracea*, Pied Kingfisher *Ceryle rudis*, Black Kite *Milvus migrans* Stone Curlew *Burhinus oedipnemus* and Euphrates softshell turtle *Rafetus euphraticus* via inundation under the reservoir area of Ilisu Dam, which is clearly prohibited by Article 4 of the Convention.

(ii) The destruction of key breeding/feeding and foraging grounds of Annex III species namely; Little Swift *Apus affinis*, Red-wattled Lapwing *Vanellus indicus*, Gull-billed Tern *Sterna (Gelocheilidon) nilotica* and Spur-winged Lapwing *Vanellus spinosus* via inundation under the reservoir area of Ilisu Dam, which is clearly prohibited by Article 6 and 7 of the Convention.

(iii) The destruction of key stopover and roosting grounds of migratory species given in Annex II and III namely; Teal *Anas crecca*, Red-throated Pipit *Anthus cervinus*, Meadow Pipit *Anthus pratensis*, Lesser-spotted Eagle *Aquila pomarina*, Common Buzzard *Buteo buteo*, White-winged tern *Chlidonias leucopterus*, Red-footed Falcon *Falco vespertinus*, Common Snipe *Gallinago gallinago*, Black-tailed Godwit *Limosa limosa*, Black Kite *Milvus migrans*, Citrine Wagtail *Motacilla citreola*, Çıvgın *Phylloscopus collybita*, Greenshank *Tringa nebularia*, Green Sandpipe *Tringa ochropus*, Redshank *Tringa tetanus* and Spotted Redshank *Tringa erythropus* via inundation under the reservoir area of Ilisu Dam, which is clearly prohibited by Article 10 of the Convention.

Moreover, although not listed in Annexes of the Convention, inundation of the reservoir area of Ilisu Dam will destroy natural habitats and populations of endemic and restricted range plant species such as *Trifolium batmanicum*. Also, there are potential Annex II species which will adversely impacted namely Collared Pratincole *Glareola pratincole*, Little Swift *Apus affinis* and Striped Hyena *Hyaena hyaena*.

With the inundation of water within the Ilisu Dam Reservoir area, Article 4 (Chapter II – Protection of habitats), Articles 6, 7 (Chapter III – Protection of species) and Article 10 (Chapter IV – Special provisions for migratory species) of the Convention will be violated.

Details on how Ilisu Dam will impact populations of these species are given in next chapter.

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

Appendix II Species:

Bonelli's Eagle *Hieraetus fasciatus*: The two known breeding pairs at the cliffs of the Dicle River (the entire population in the region and 6% of the Turkish population) will be lost permanently due to the inundation of their nesting sites.

Griffon Vulture *Gyps fulvus*: The only known breeding colony of the species (25-30 pairs) is at the Dicle Valley near Güçlükonak. The Griffon Vulture colony and the Bonelli's Eagle nest are located at the same cliffs at an altitude of ca. 30 meters from the river. The colony near Güçlükonak will be lost

permanently due to the inundation of the nesting sites. This colony is the only known breeding site of the species in the region while it constitutes nearly 10% of the entire Turkey population.

Egyptian Vulture *Neophron percnopterus* While the known two nests near Hasankeyf will disappear due to the inundation of their nesting sites; it is difficult to assess the full impact of the project on the population of this species because the full distribution of the species in the region is not adequately surveyed.

Lesser Kestrel *Falco naumanni* At least the colony in Hasankeyf and almost certainly some other populations (collectively corresponding to 50% of the local breeding population) will be lost permanently due to the inundation of their nesting sites.

Pied Kingfisher *Ceryle rudis* In Europe, the species breeds only in Turkey. The Dicle River is one of the last main breeding areas of the species in Turkey and in Europe and it hosts approximately 20% of the species' remaining European population. If the Ilisu Dam is constructed, one of the last core breeding grounds of the species in Turkey and Europe will be lost permanently.

Eurasian Roller *Coracias garrulus* While the known core population in Hasankeyf will disappear due to the inundation of their nesting sites; it is difficult to assess the full impact of the project on the population of this species because the full distribution of the species in the region is not adequately surveyed.

Euphrates Soft-shelled Turtle *Rafetus euphraticus* This species occurs only in the Euphrates and Tigris rivers in the world, starting from south-eastern Turkey. This species is almost exclusively riverine, inhabiting preferably permanent and temporary tributaries and oxbow lakes as well as slow flowing sections of the main river channel. Major dams cause fundamental changes to water quality and the flow regime downstream, making it impossible for the species to survive in long downstream riverine stretches. The loss of sandbank nesting habitat through inundation and sand mining is also a serious threat. This globally threatened species is declining in Turkey because of dams. The species is known to occur in the Dicle Floodplain and Bostancı areas, in the Tigris River and its tributaries and it will largely decrease if the dam is built causing further deterioration of the global conservation status of the species.

Potential Annex II Species:

Collared Pratincole *Glareola pratincole* 100-200 pairs of the species breed in shingle islands in the downstream of the proposed dam – in Bostancı area. This corresponds to the 100% of the known breeding population along the Dicle River, at least 3% of the national population and 1% of the entire European population. This population will be lost permanently due to the inundation of their nesting sites.

Little Swift *Apus affinis* In Europe, the species breeds only in Turkey (except a single pair in Spain). While the known nesting areas in Hasankeyf will disappear due to the inundation of their nesting sites; the population that will be affected by the project corresponds to at least 10% of the species Turkish and European populations.

Striped Hyena *Hyaena hyaena* Presence of the species is reported to be at open and rocky areas of North Mesopotamian Steppe, Hasankeyf, Güçlükonak/Taşkonak and Bostancı. The surroundings of Derik-Atalar and Dargeçit as well as the Hasankeyf area are of particular importance for the species. The species is known to use cavities and caves in the lower parts of the slopes. Not only the barrier effect of the dam, but also the habitat loss in cavities and caves in the lower parts of the slopes over large distances might jeopardize the hyena population in the region, since this species is already endangered and lives in very low population densities.

Trifolium batmanicum (EN) of which the world distribution is confined to the surroundings of the catchment area of the proposed dam. The project may result in loss of a large proportion of the global population of this plant species.

3. What might be the negative effects for the species or habitat/s involved?

The negative effects for the species were given in previous section in detail.

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 site?

Majority of the surface area of Ilisu Dam Reservoir is located within three different Key Biodiversity Areas, selected using globally recognized and developed criteria by experts of IUCN and BirdLife International, which can be considered as shadow Natura 2000 sites for Turkey. These KBAs are; Bismil Plain¹, Dicle Valley² and Küpeli Mountain³ in northwest-southeast direction consecutively.

Moreover, Dicle Valley KBA is in Important Bird Areas (IBAs) in Danger list declared by BirdLife International. IBAs in Danger sites are defined as; “*These 241 sites represent a subset of the more than 12,000 IBAs and have been identified as being those under very high pressure in recent years and in need of immediate action.*” by BirdLife International.

¹ <http://datazone.birdlife.org/site/factsheet/bismil-plain-iba-turkey>

² <http://datazone.birdlife.org/site/factsheet/dicle-valley-iba-turkey/text>

³ <http://datazone.birdlife.org/site/factsheet/k%C3%BCpeli-mountain-iba-turkey>

5. Do you know if there are any pending procedures at the national or international level regarding the object of your complaint?

No.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc)

The EIA for the project is available in Turkish.

Doga Derneği (BirdLife Turkey) prepared a detailed assessment document for the EIA report in 2016. The document can be provided if requested.

The maximum surface area of the dam will be 313 km².

