



Strasbourg, 23 March 2022

T-PVS/Files(2022)45

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

42<sup>nd</sup> meeting

Strasbourg, 29 November - 2 December 2022

---

**New complaint: 2021/09**

**Possible negative impact on the Luhansk region  
from hydraulic gas drilling activities  
(Ukraine)**

**- COMPLAINT FORM -**

*Document prepared by  
Residents of the Starobelsky district of the Luhansk region of Ukraine*

---

**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:

**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:

Victor.....

Surname(s)

Kryvko.....

..

On behalf of (if applicable): Residents of the Starobelsky district of the Luhansk region of  
Ukraine.....

.....

Date : 16 october 2021

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).**

After the State Company "NAFTOGAZ UKRAINE" received the right to use the Yuzovskaya area for the purpose of gas production, the Limited Liability Company "STRATUM UKRAINE" in 2021 began preparations for drilling operations in the Luhansk region of Ukraine. Official documents are posted on the website Unified Register with Environmental Impact Assessment: <http://eia.menr.gov.ua/uk/case/id-7772>

This action is a direct violation of the Berne Convention, which in Ukraine must also comply. The activity of STRATUM UKRAINE LLC violates several conventions at once and violates human rights. According to media reports, both before the 2014 war and now, it is known that work in the Luhansk region for the development of gas fields will be carried out using the hydraulic fracturing method. This will cause irreparable harm to the natural resources of the Luhansk region.

After the outbreak of the war in Donbass in 2014, all eco-activists who openly spoke out in defense of the nature of the Luhansk region were forced to either leave this region, or they ended up in the occupied territory. Therefore, the locals asked me to help them protect the environment.

Since all our complaints and appeals directed to local, district, regional and state authorities of the Ukrainian authorities were ignored, we had to turn to the European Union for help.

**2. Which are the specific specie/s 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)**

Information is attached separately in the report.

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

When drilling horizontal wells and using hydraulic fracturing, seismic activity increases due to changes in the structure of the subsoil, groundwater, surface water and soils are polluted, and methane is released into the atmosphere. Large volumes of waste water contaminated with chemicals accumulate near the deposits, which will inevitably enter the soil. And since in our region there are large reserves of water that are close to the surface, fauna and flora will be gradually destroyed.

**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?**

RAMSAR, CMS, Emerald network site.

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

At the national level, all complaints are inconclusive. To those that I sent earlier, I attach two more documents in a separate letter, in which you can see an attempt at deception and an example of a bureaucratic unsubscribe that does not give a direct answer to the question posed.

At the international level, there are still no replies from the Commissioner for Human Rights, European Human Rights Advocacy Center (EHRAC), Ramsar Secretariat to the complaint we sent.

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

Such information is available only on the website of the Unified Register with an Environmental Impact Assessment: <http://eia.menr.gov.ua/uk/case/id-7772>

In particular, the report in Ukrainian by STRATUM UKRAINE LLC, which was deliberately compiled without describing the full picture of the impact on the environment: <http://eia.menr.gov.ua/uploads/documents/7772/reports/1K5jDNfyxU.pdf>

[Annex I](#) - Remarks of the NGO "Ukrainian Environmental Protection Group"

[Annex II](#) – Flora and Fauna species of the region