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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

41<sup>st</sup> meeting  
Strasbourg, 29 November – 3 December 2021

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**Complaint on stand-by: 2020/04**

**The Amulsar gold mine project and its impacts on  
Emerald Network sites  
(Armenia)**

**- REPORT BY THE GOVERNMENT -**

*Document prepared by the  
Ministry of Environment of Armenia*

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- July 2021 -



REPUBLIC OF ARMENIA  
DEPUTY MINISTER OF ENVIRONMENT

Nº 3/06.3.7/9754  
« 29 » « 07 » 2021

To: Ms. Ursula Sticker  
Secretary of the Bern Convention

Dear Ms. Sticker

The Ministry of Environment of the Republic of Armenia presents its compliments to the Secretariat of the Bern Convention and expresses its gratitude for the continued support.

Referring to the Complaint 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites, I would like to inform you that currently, relevant activities are being carried out for clarification and adjustment of all boundaries of potential sites, including "Jermuk", in order to cover the most important habitats and areas of plant and animal species, in accordance with the recommendations of the Convention. According to these recommendations plant and animal species and habitats of Emerald Network candidate sites are dispersed in every region as stated in the following categories: A: 15- 100% representation of the population of the species or the habitats; B: 2-15a, C:1-2, D: non-essential (less than 1%).

As to the "Sevan" and "Gorhajk" sites, according to the studies conducted, in the result of the exploitation of the Amulsar mining site and the processing plant, they will not be exposed to the negative impact, even in the case of emergency pollution, considering that both sites are located the elevation much more higher than processing plant.

All possible negative impacts presented in Complaint are unfounded and have not any scientific justification or evidence based predictions, since the existence of Mammal species listed in Complaint (Persian leopard (*Panthera pardus saxicolor*), Grey wolf (*Canis lupus*); Bezoar goat (*Capra oegogrus*), Eurasian otter (*Lutra lutro*), Eurasian lynx (*Lynx lynx*), Brown bear (*Ursus arctos*), Marbled polecat (*Vormela peregusna*), Common bent-wing bat (*Miniopterus schreibersii*), Lesser mouse-eared bat (*Myotis blythii*), Geoffroy's bat (*Myotis emarginatus*), 'Mediterranean horseshoe bat (*Phinolophus euryole*), 'Greater horseshoe bat (*Phinolophus ferrumequinum*), 'Lesser horseshoe bat (*Phinolophus hipposideros*), 'Mehely's horseshoe bat (*Rhinolophus mehelyi*), IUCN Red List Vulnerable: mouflon (*Ovis orientalis*)), is not confirmed on the territory of the mine.

Bird species presented in the Complaint [Common kingfisher (*Alcedo atthis*), Tawny pipit (*Anthus campestris*), European nightjar (*Coprimulgus europaeus*), Corncrake (*Crex crex*), Syrian woodpecker (*Dendrocopos syriacus*), Ortolan bunting (*Emberiza hortulana*), Red-backed shrike (*Lanius collurio*), Lesser grey shrike (*Lanius minor*), Woodlark (*Lullula arborea*), 'Bluethroat (*Luscinia svecica*), Red-billed chough (*Pyrrhocorax pyrrhocorax*), Barred warbler (*Sylvia*

*nisorio*), ' Ruddy shelduck (*Tadorno ferruginea*), Lammergeier (*Gypaetus barbotus*), Egyptian vulture (*Neophron percnopterus*), Golden eagle (*Aquila chrysaetos*), Lesser spotted eagle (*Clango pomarino*), Booted eagle (*Hieraaetus pennotus*), ' Short-toed eagle (*Circoetus gallicus*)', European honey buzzard (*Pernis aPivorus*), Long- legged buzzard (*Buteo rufinus*), Montagu's harrier (*Circus pygargus*), Peregrine falcon (*Falco peregrinus*), Lesser kestrel (*Falco naumanni*); Eagle owl (*Bubo bubo*), Greater short- toed lark (*Colondrella brochydoctylo*)) are not nesting in the indicated territory. Those species, which fly through the current territory, since they have large hunting grounds within their foraging range (such as Bearded vulture (*Gypaetus barbatus*), Golden eagle (*Aquila chrysoetos*), or Peregrine falcon (*Falco peregrinus*), have enough hunting area, as they already use other nearby territories.

All the fish species (*Aspius aspius*, *Lucio barbus comizo*, *Sabanejewio aurata*], invertebrates (*Euplogio quodripunctario*) and plants species (*Echium russicum*) are not inhabiting the territory indicated in Complaint.

In addition to the April 16, 2021 report of the Ministry of Environment of RA, we would like to inform you that optimization of candidate sites of «Emerald Network» is currently being carried out and after the compilation of expert researches, the Ministry will officially submit the optimized list of candidate sites to the Secretariat of the Convention.

Sincerely,



Anna Mazmanyana  
International Cooperation Department

- April 2021 -

REPUBLIC OF ARMENIA  
DEPUTY MINISTER OF ENVIRONMENT№ 3/08.8/5337  
« 16 » « 04 » 202 1To: Ms. Ursula Sticker  
Secretary of the Bern Convention

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Bird species presented in the Complaint [Common kingfisher (*Alcedo atthis*); Tawny pipit (*Anthus campestris*); European nightjar (*Caprimulgus europaeus*); Corncrake (*Crex crex*); Syrian woodpecker (*Dendrocopos syriacus*); Ortolian bunting (*Emberiza hortulana*); Red-backed shrike (*Lanius collurio*); Lesser grey shrike (*Lanius minor*); Woodlark (*Lullula*

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*arborea*); Bluethroat (*Luscinia svecica*); Red-billed chough (*Pyrrhocorax pyrrhocorax*); Barred warbler (*Sylvia nisoria*); Ruddy shelduck (*Tadorna ferruginea*); Lammergeier (*Gypaetus barbatus*); Egyptian vulture (*Neophron percnopterus*); Golden eagle (*Aquila chrysaetos*); Lesser spotted eagle (*Clanga pomarina*); Booted eagle (*Hieraaetus pennatus*); Short-toed eagle (*Circaetus gallicus*); European honey buzzard (*Pernis apivorus*); Long-legged buzzard (*Buteo rufinus*); Montagu's harrier (*Circus pygargus*); Peregrine falcon (*Falco peregrinus*); Lesser kestrel (*Falco naumanni*); Eagle owl (*Bubo bubo*); Greater short-toed lark (*Calandrella brachydactyla*)] are not nesting in the indicated territory. Those species, which fly through the current territory, since they have large hunting grounds within their foraging range (such as Bearded vulture (*Gypaetus barbatus*), Golden eagle (*Aquila chrysaetos*), or Peregrine falcon (*Falco peregrinus*), have enough hunting area, as they already use other nearby territories.

All the fish species (*Aspius aspius*, *Lucio barbus comizo*, *Sabanejewia aurata*), invertebrates (*Euplagia quadripunctaria*) and plants species (*Echium russicum*) are not inhabiting the territory indicated in Complaint.

In order to ensure evidence based, rigorous and relevant data pertaining to candidate sites, additional and extensive field work is required. Once the mentioned activities are implemented the Ministry of Environment will in turn officially communicate the optimized list of candidate sites of Emerald Network to the Secretariat of the Convention.

Sincerely,



Anna Mazmanyan

