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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

42nd meeting
Strasbourg, 28 November - 2 December 2022

New complaint: 2022/05

**Fence Construction on the Polish-Belarusian Border
(Poland)**

- COMPLAINT FORM -

*Document prepared by
12 stakeholders*

**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

First

name:..Natallia.....

Surname(s) Muryna.....

On behalf of (if applicable): . ceo, Charity Fundation "Heritage"

Date : 01 Dec 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).

The “concertina metal rope” barbed wire currently installed by the Polish authorities on the border with the Republic of Belarus is an insurmountable barrier on the way of different types wild animals migrating in the cross-border zone at world heritage territory, and, become the cause of serious injuries, including the painful death of large representatives of the animal world. Over the past month, according to official media sources, four deaths of elk and deer were recorded in the border strip as a result of stab wounds! In our opinion, the situation needs immediate intervention and reaction. Such actions, causing irreparable damage to wildlife, are a direct deliberate violation of international legal obligations. Installing fatally traumatic migratory animal structures at the borders, into which they cannot escape, is a serious violation of various conventions and directives:

...problem of conservation of wild flora and fauna should be taken into account by governments in their national goals and programs, and that international cooperation should be developed to protect particular migratory species. Article 4, paragraph 3, of the Convention obliges the contracting parties to pay special attention to the protection of areas that are of importance to migratory species and which, accordingly, adjoin migratory routes as areas for wintering, gathering, feeding, breeding or molting (Convention on the Conservation of European Wildlife and Natural Habitats);

...states must be the protectors of migratory species of wild animals that live within and across borders of national jurisdiction. “It is emphasized that” the effective management and conservation of migratory species of wild animals requires joint action by all states within the national jurisdiction of which these species spend any part of their life cycle. Article 3, paragraph 4, imposes an obligation on States parties to endeavor to “prevent, eliminate, compensate or, as appropriate, minimize the negative consequences of acts or hindrances that seriously impede or prevent the migration of wild animals” (Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention; CMS).

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)

A section of the Belarusian-Polish border, inside the area of “Belovezhskaya Pushcha”, which has a European diploma for protected areas, and, as well — UNESCO World Heritage Site with connection to “Polesye Valley of River Bug”. “Belovezhskaya Pushcha” is the main habitat of the European bison “zubr”, listed in the Red Book of the International Union for Conservation of Nature and many other animals, birds, bees, etc. That “fence” can be surly dangerous for: European bison (European bison), Deer, Roe, Doe, Tarpan horse, Tour, Elk, Roe, Boar, Brown bear, Lynx, Wolf, Otter, Teterev, Wood grouse, Bustard, Swarms of migrating bees, etc.

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

- When animals hit by barbed wire “concertina metal rope”, are scared of the sound, light at night, etc., — the animal begins to rush, receiving injuries incompatible with life (lacerated wounds, torn pieces of flesh, wire stuck in the body, etc.). Loss of habitat, lack of access to food, violation of the breeding area, deprivation of the possibility of migration, passing a border safely etc.
- **As well also:**
- violation of the protection of the territories included in the “Emerald Network”, at the level of protection provided within the “Natura 2000” network;

- obstacle to tackling the global loss of biodiversity, habitats and landscape fragmentation in Europe and addressing habitat diversity issues that are not associated with a specific protected area;
- depriving the possibility of introducing an ecosystem approach and ensuring the protection of large heterogeneous habitats;
- an obstacle to the protection of biological and landscape diversity in all sectors, such as spatial planning, construction, mining, agriculture and forestry, as well as environmental protection from pollution, including mitigation and adaptation to climate change;

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?

Yes. The most important environmental conventions are under weight, Emerald Network of Areas of Special Conservation Interest, as well RAMSAR protected areas etc. It is a living worldwide treasure of any existing networks and the last relic site in the European territory - “Belovezhskaya Pushcha” has the status of a world natural heritage site of UNESCO.

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)

- Polesye Valley of River Bug has been designated as a Wetland of International Importance and listed as [Ramsar Site number 2252](#).
- Schematic map of specially protected natural areas of the Republic of Belarus: <https://minpriroda.gov.by/ru/map-ru/>
- One of the many media articles: The animal died on the Belarusian-Polish border due to the fences installed by the Polish side, right next to the fence on the Polish section of the border, receiving injuries incompatible with life: <https://sputnik.by/amp/20210913/ogromnyy-los-poluchil-smertelnye-raneniya-na-kolyuchey-granitse-s-polshey-1056417748.html>

**Convention on the Conservation of
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Habitats**



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Directorate of Democratic Participation

Council of Europe

F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name (Имя). *Aleksander*

Surname

(Фамилия). *Buryj*

On behalf of (if applicable) (От имени (если применимо)):

As General Director of the State environmental institution "Belovezhskaya Pushcha National Park"

Date : 09.02.2022

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).

In January 2022, the Republic of Poland began construction of a fence along the state border, which will pass through the territory of Belovezhskaya Pushcha, which is a transboundary UNESCO World Heritage Site. The installation of a fence, with a length of about 50 km, with the infrastructure, will have a negative impact on the sustainability of old-growth forests of natural origin and the natural complex of the protected area as a whole. The spatial and functional integrity of unique ecosystems will be violated. There will appear created obstacle on the migration routes of wild animals, including rare species, which will lead to the impoverishment of the gene pool of large mammals due to the isolation of population groups. The environmental impact assessment of the barrier and consultations with the Belarusian side on this project were not carried out. We believe that these actions violate the principles declared by the Convention for the conservation of species of wild flora and fauna and the protection of their natural habitats (Preamble, Articles: 1, 2, 3, 4, 5 and others).

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)

Populations of large animals, such as *Bison bonasus*, *Cervus elaphus*, *Canis lupus*, *Lynx lynx*.

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

This fence will become a permanent barrier that will have a negative impact primarily on the populations of rare and protected species of animals, limiting their movement, and, consequently, the flow of genes. The viability of populations will be disrupted due to the depletion of the gene pool of mammals due to the isolation of population groups and the fragmentation of their habitat.

- 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?**

International conventions are also ignored: "On Biological Diversity" (), "On the Protection of Migratory Species of Wild Animals" (Bonn, 1983).

Belovezhskaya Pushcha was included in the list of UNESCO World Heritage Sites in 2014 as a single transboundary territory (Belarus/Poland) on an area of about 140 thousand hectares (60 thousand hectares - the Polish part and 80 thousand hectares - the Belarusian part). The World Heritage Committee accepted the obligations of the two countries to preserve the integrity of the forest and manage the Property in accordance with the criteria of its outstanding universal value, reflected in the nomination dossier. The main principles of management are non-interference with wildlife, ensuring natural ecological processes, preserving the unique combination of habitats and biological diversity of species.

An artificial barrier will prevent implementation of most of the recommendations of the World Heritage Center and the conclusions of the experts of the International Union for Conservation of Nature, especially regarding the creation of a joint transboundary integrated management plan in order to preserve the outstanding universal value of the UNESCO World Heritage site.

- 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)**

No official information from the Polish side has been provided. Construction work was started unilaterally.

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F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First

name: Ivan.....

Surname(s)... Shchadranok.....

On behalf of (if applicable): Interakcia Foundation

Date : 14/02/2022

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).

This January Poland began construction of a fence along the Belarusian-Polish border, which will pass through the territory of Belovezhskaya Pushcha – a UNESCO World Heritage Site. The fence will have a negative impact on the natural complex of the protected area, as it will create a barrier on the way of different types of wild animals migrating in the cross-border zone. Installation of the barbed wire provokes injuries and deaths of the rare species.

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)

Belovezhskaya Pushcha, Belarusian-Polish border region.

Populations of wild animals: bison, wolf

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

The fence will create a barrier with negative impact on the protected species, depriving freedom of movement. It poses a serious threat to existence of populations and it provokes genetic degeneration. Wild animals are trapped between engineering infrastructure.

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?

The Convention Concerning the Protection of the World Cultural and Natural Heritage.

The Convention on Biological Diversity.

The Convention on the Conservation of Migratory Species of Wild Animals.

Affected species fall under the Emerald Network, the European diploma for protected areas, NATURA 2000 and RAMSAR protected areas.

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

No, there is no information on procedures of Poland for assessing the possible impact of the planned activities on the environment.

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

The EIA has not been carried out.

Experts from all over the world signed a letter addressed to the EU institutions calling suspend construction of the fence till the EIA is prepared.

<https://naukadlaprzyrody.pl/2022/01/31/list-srodowiska-naukowego-do-ke-ws-budowy-muru-na-granicy-polsko-bialoruskiej/>

NGOs appealed the EU institutions on the issue.

<https://pracownia.org.pl/upload/filemanager/pracownia.org.pl/Dokumenty/Appeal-of-NGO-to-the-European-Commission.pdf>

Numerous civil initiatives and petitions have been launched:

- “No to wall in the heart of Puszcza”

https://dzialaj.greenpeace.pl/nie-dla-muru?utm_source=EN&utm_medium=email&utm_campaign=Biodiversity

- “No to the destruction of Belovezhskaya Pushcha by building a wall on the border”

<https://naszademokracja.pl/petitions/nie-dla-niszczenia-puszczy-bialowieskiej-przez-budowe-muru-na-granicy>

- “No to wall and to closed areas in the Belovezhskaya Pushcha region”

https://secure.avaaz.org/community_petitions/en/wladze_samorzadowe_nie_dla_muru_i_stref_zamknietych_w_rejonie_puszczy_bialowieskiej_pl_eng/?fpla

- etc.

Plenty of protest actions took place in Poland (Warsaw, Bialystok, Krakow, Poznan, Lublin, Torun, etc).

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First name *Aleksander*

Surname *Volchak*.....

Dr. Sc. (geography) of RF & RB

On behalf of (if applicable) : from university scientists

Date : 15.02.2022

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).

At the beginning of 2022, the Republic of Poland began the construction of a fence that will pass through the territory of Belovezhskaya Pushcha, which is a transboundary UNESCO World Heritage Site. According to available information, the construction of a concrete and steel barrier up to 5.5 meters high will require a significant amount of work (including backfilling of the road surface for heavy equipment, possibly with peat removal, etc.). This will lead to the destruction of the living above ground cover during construction work and disruption of the hydrological regime of adjacent ecosystems both on the Polish and Belarusian sides, especially near transboundary watercourses (floodplain sections of the Narew, Gvozna, Narevka, Lesnaya Pravaya and others). The consequence of changes in the hydrological regime will be the disruption of natural processes and the subsequent transformation of communities, up to the drying up of forests in the event of severe flooding. The fence along the territory of Belovezhskaya Pushcha will create an obstacle on the migration routes of wild animals, incl. especially endangered and vulnerable species, as well as natural habitats. The environmental impact assessment of the barrier and consultations with the Belarusian side on this project were not carried out. We believe that these actions violated the principles declared by the Convention for the conservation of species of wild flora and fauna and the protection of their natural habitats (Preamble, Articles: 3, 4, 5).

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)

Populations of large mammals, such as the European bison (*Bison bonasus*), the red deer (*Cervus elaphus*), the wolf (*Canis lupus*), and the lynx, will be most affected.

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

This barrier will block migration routes and seasonal movements of animals, will have a negative impact primarily on the populations of rare and protected species of animals, which will lead to the subsequent depletion of the mammalian gene pool, as well as the rupture of transboundary ecological corridors.

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?

The international convention "On the Protection of Migratory Species of Wild Animals" (Bonn, 1983) is also ignored. The Natura 2000 facilities will be affected during the construction process.

Belovezhskaya Pushcha is a transboundary UNESCO World Heritage Site. The World Heritage Committee accepted obligations from the two countries to preserve the integrity of the forest and manage the Property in accordance with the fundamental principles (non-interference with wildlife, ensuring natural ecological processes, preserving the unique combination of habitats and biological diversity of species). The artificial barrier endangers the existence of this unique natural Object.

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)

Materials posted on the official website of the State Border Committee of the Republic of Belarus

<https://gpk.gov.by/news/gpk/137537/>

<https://gpk.gov.by/news/gpk/135380/>

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E-mail: Bern.convention@coe.int

First name Mikalai

Surname (Фамилия).

Mikhalchuk.....

On behalf of (if applicable): scientists of State Scientific Establishment «The Polesie Agrarian Ecological Institute of the National Academy of Sciences of Belarus».....

Date : 13.02.2022

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).

According to the Internet sources, Poland's intentions are declared to equip an additional system of capital concrete, wire, mesh and possibly other barriers along the state border on the territory of the bilateral biosphere reserve "Belovezhskaya Pushcha" (Poland-Belarus) and the adjacent strip of the national park "Belovezhskaya Pushcha". The intentions have not been discussed or agreed upon with the public and scientists of Belarus and, if implemented, can cause significant damage to the populations of at least 41 animal species included in the II and III Annexes of the Berne Convention and contradict Articles 1, 2, 3, 6b, 6c, 11a, 11b of the Berne Convention.

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)

Imminent damage to habitats is predicted directly during the construction and subsequent operation of the capital barriers: 5 amphibian species, 1 reptile species, 7 bird species, 7 mammal species (Appendix II); 2 amphibian species, 2 reptile species, at least 6 bird species, 11 mammal species (Appendix III).

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

On the territory of the transboundary strip of the biosphere reserve and the Belovezhskaya Pushcha National Park, the populations of these forest and marsh species of animals live in relative conditions of minimal disturbance, or in conditions of unhindered daily seasonal movement along transboundary rivers, streams, swampy floodplains and other ecotones, or in conditions with minimal risk of collisions with technical barriers in foggy weather, or in closed forest and swamp biotopes, relatively difficult for predators to access.

Construction (noise, light, vibrations), operation (passage of machinery), as well as subsequent insurmountable, difficult to overcome, or poorly visible barriers will provoke stress reactions in animals, breaks in seasonal and daily migrations, disruption of feeding trajectories, increased accessibility for transit and local predators, injuries and death of individuals from collisions with barriers and under the wheels of vehicles. Animal populations included in Annexes II and III living in the transboundary zone of the Belovezhskaya Pushcha of Poland and Belarus are of particular importance for biological diversity, as they represent an element of the standard forest lowland ecosystems in terms of structure and preservation throughout the meridional and latitudinal extent of Europe.

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?

Potentially affected species and habitats and the substance of our statement are subject to international conventions: CMS, Aarhus, On Biological Diversity.

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

Not known

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

EIA, including transboundary predictive assessment, has not been carried out

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E-mail: Bern.convention@coe.int

First name:

Yauheni.....

Surname(s)

Filimonau.....

On behalf of (if applicable): NGO Ecomonitoring Public Association.....

Date : 19.02.2022

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).

Poland is going to construct fencing at the Belarusian-Polish border - a metal structure 5 meters high with barbed wire. It will be installed by means of cutting down a strip in the forest, which will destroy the soil cover and will cause soil degradation. Creation of artificial barriers threaten the existence of rare ecosystems. The fence will split flora and fauna of the Belovezhskaya Pushcha - UNESCO World Heritage Site.

The actions of the Polish authorities are contrary the article 10 of the Convention -

“1 The Contracting Parties undertake, in addition to the measures specified in Articles 4, 6, 7 and 8, to co-ordinate their efforts for the protection of the migratory species specified in Appendices II and III whose range tends into their territories.

2 The Contracting Parties shall take measures to seek to ensure that the closed seasons and/or other procedures regulating the exploitation established under paragraph 3.a of Article 7 are adequate and appropriately disposed to meet the requirements of the migratory species specified in Appendix III”.

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)

Construction of fencing by Poland concerns the area of the Belovezhskaya Pushcha, especially the part of the border between 2 countries.

European bison, Lynx, Brown bear, Tarpan horse, Tour, Elk, Doe, Boar, Deer and others are under risks.

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

The planned wall slashes through the Belovezhskaya Pushcha, regarded as one of the last surviving patches of the primeval forest that once covered Europe.

The wall will create a barrier with devastating consequences and that logging and road development during its construction will be detrimental to the conservation status of species and habitats. Interruptions to ecological corridors between Europe and Eurasia will block migration routes of large mammals such as the European bison, wolf, lynx, elk and deer. The project will divide animal habitats and interrupt ecological connectivity. The result will be a decrease in the already low genetic variability of species like bison, lynx or wolf. Small and isolated populations are more vulnerable and the loss even of a single individual, especially a reproducing female, could prove an existential threat.

Disruption of the hydrological regime threatens the valuable old-aged deciduous and black alder forests, carries risks of shallowing of the rivers, the loss of some swamps that are the habitat of very rare birds.

The wall could threaten the forest's UNESCO status, as well as the status of the area protected by the European diploma (the Belarusian part).

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?

Poland violates the Convention on the Conservation of Migratory Species of Wild Animals.

The species and habitats of the area Belovezhskaya Pushcha are protected under the European diploma for protected areas, the Emerald Network. The construction of the wall will create a barrier with devastating consequences, leading to permanent interruption of the functional connectivity of the ecological corridors of the Natura 2000 network on the European scale.

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

No. No studies, including environmental ones, will be carried out.

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

Polish scientists and their colleagues from other countries, and also local residents are calling on the authorities to suspend the construction of the fence in the forest.

<https://www.facebook.com/adam.wajrak/posts/10228193278765152>

<https://www.euronews.com/2022/02/08/uk-europe-migrants-poland-environment>

<https://www.politico.eu/article/polands-bison-unfriendly-border-barrier/>

https://naukadlaprzyrody.pl/2022/01/31/list-srodowiska-naukowego-do-ke-ws-budowy-muru-na-granicy-polsko-bialoruskiej/?fbclid=IwAR0C11fOOb8NAhe_xIaQYBI72xcU-QsPGa2Ui7k6aJ3NQigwytIxYmJno_Y

<https://theconversation.com/polands-border-wall-will-cut-europes-oldest-forest-in-half-173735>

<https://naukadlaprzyrody.pl/2022/01/31/list-srodowiska-naukowego-do-ke-ws-budowy-muru-na-granicy-polsko-bialoruskiej/>

<https://www.politico.eu/article/polands-bison-unfriendly-border-barrier/>

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E-mail: Bern.convention@coe.int

First name:

JIM.....

Surname(s)

LHOTTE.....

On behalf of (if applicable):

Date : 19.02.2022

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).

Poland is going to construct fencing at the Belarusian-Polish border - a metal structure 5 meters high with barbed wire. It will be installed by means of cutting down a strip in the forest, which will destroy the soil cover and will cause soil degradation. Creation of artificial barriers threaten the existence of rare ecosystems. The fence will split flora and fauna of the Belovezhskaya Pushcha - UNESCO World Heritage Site.

The actions of the Polish authorities are contrary the article 10 of the Convention -

“1 The Contracting Parties undertake, in addition to the measures specified in Articles 4, 6, 7 and 8, to co-ordinate their efforts for the protection of the migratory species specified in Appendices II and III whose range tends into their territories.

2 The Contracting Parties shall take measures to seek to ensure that the closed seasons and/or other procedures regulating the exploitation established under paragraph 3.a of Article 7 are adequate and appropriately disposed to meet the requirements of the migratory species specified in Appendix III”.

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)

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European bison, Lynx, Brown bear, Tarpan horse, Tour, Elk, Doe, Boar, Deer and others are under risks.

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

The planned wall slashes through the Belovezhskaya Pushcha, regarded as one of the last surviving patches of the primeval forest that once covered Europe.

The wall will create a barrier with devastating consequences and that logging and road development during its construction will be detrimental to the conservation status of species and habitats. Interruptions to ecological corridors between Europe and Eurasia will block migration routes of large mammals such as the European bison, wolf, lynx, elk and deer. The project will divide animal habitats and interrupt ecological connectivity. The result will be a decrease in the already low genetic variability of species like bison, lynx or wolf. Small and isolated populations are more vulnerable and the loss even of a single individual, especially a reproducing female, could prove an existential threat.

Disruption of the hydrological regime threatens the valuable old-aged deciduous and black alder forests, carries risks of shallowing of the rivers, the loss of some swamps that are the habitat of very rare birds.

The wall could threaten the forest's UNESCO status, as well as the status of the area protected by the European diploma (the Belarusian part).

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?

Poland violates the Convention on the Conservation of Migratory Species of Wild Animals.

The species and habitats of the area Belovezhskaya Pushcha are protected under the European diploma for protected areas, the Emerald Network. The construction of the wall will create a barrier with devastating consequences, leading to permanent interruption of the functional connectivity of the ecological corridors of the Natura 2000 network on the European scale.

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

No. No studies, including environmental ones, will be carried out.

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

Polish scientists and their colleagues from other countries, and also local residents are calling on the authorities to suspend the construction of the fence in the forest.

<https://www.facebook.com/adam.wajrak/posts/10228193278765152>

<https://www.euronews.com/2022/02/08/uk-europe-migrants-poland-environment>

<https://www.politico.eu/article/polands-bison-unfriendly-border-barrier/>

https://naukadlaprzyrody.pl/2022/01/31/list-srodowiska-naukowego-do-ke-ws-budowy-muru-na-granicy-polsko-bialoruskiej/?fbclid=IwAR0C11fOOb8NAhe_xIaQYBI72xcU-QsPGa2Ui7k6aJ3NQigwytIxYmJno_Y

<https://theconversation.com/polands-border-wall-will-cut-europes-oldest-forest-in-half-173735>

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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:

Bern Convention Secretariat

Directorate of Democratic Participation

Council of Europe

F-67075 Strasbourg Cedex E-mail: Bern.convention@coe.int

First name: **MARK JAMES**

.....

Surname(s) **REARDON**.....

On behalf of (if applicable):

.....

Date : 21.02.2022

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).

Poland is going to construct fencing at the Belarusian-Polish border - a metal structure 5 meters high with barbed wire. It will be installed by means of cutting down a strip in the forest, which will destroy the soil cover and will cause soil degradation. Creation of artificial barriers threaten the existence of rare ecosystems. The fence will split flora and fauna of the Belovezhskaya Pushcha - UNESCO World Heritage Site.

The actions of the Polish authorities are contrary the article 10 of the Convention -

“1 The Contracting Parties undertake, in addition to the measures specified in Articles 4, 6, 7 and 8, to co-ordinate their efforts for the protection of the migratory species specified in Appendices II and III whose range tends into their territories.

2 The Contracting Parties shall take measures to seek to ensure that the closed seasons and/or other procedures regulating the exploitation established under paragraph 3.a of Article 7 are adequate and appropriately disposed to meet the requirements of the migratory species specified in Appendix III”.

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)

Construction of fencing by Poland concerns the area of the Belovezhskaya Pushcha, especially the part of the border between 2 countries.

European bison, Lynx, Brown bear, Tarpan horse, Tour, Elk, Doe, Boar, Deer and others are under risks.

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

The planned wall slashes through the Belovezhskaya Pushcha, regarded as one of the last surviving patches of the primeval forest that once covered Europe.

The wall will create a barrier with devastating consequences and that logging and road development during its construction will be detrimental to the conservation status of species and habitats. Interruptions to ecological corridors between Europe and Eurasia will block migration routes of large mammals such as the European bison, wolf, lynx, elk and deer. The project will divide animal habitats and interrupt ecological connectivity. The result will be a decrease in the already low genetic variability of species like bison, lynx or wolf. Small and isolated populations are more vulnerable and the loss even of a single individual, especially a reproducing female, could prove an existential threat.

Disruption of the hydrological regime threatens the valuable old-aged deciduous and black alder forests, carries risks of shallowing of the rivers, the loss of some swamps that are the habitat of very rare birds.

The wall could threaten the forest's UNESCO status, as well as the status of the area protected by the European diploma (the Belarusian part).

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?

Poland violates the Convention on the Conservation of Migratory Species of Wild Animals.

The species and habitats of the area Belovezhskaya Pushcha are protected under the European diploma for protected areas, the Emerald Network. The construction of the wall will create a barrier with devastating consequences, leading to permanent interruption of the functional connectivity of the ecological corridors of the Natura 2000 network on the European scale.

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

No. No studies, including environmental ones, will be carried out.

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

Polish scientists and their colleagues from other countries, and also local residents are calling on the authorities to suspend the construction of the fence in the forest.

<https://www.facebook.com/adam.wajrak/posts/10228193278765152>

<https://www.euronews.com/2022/02/08/uk-europe-migrants-poland-environment>

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<https://theconversation.com/polands-border-wall-will-cut-europes-oldest-forest-in-half-173735>

<https://naukadlaprzyrody.pl/2022/01/31/list-srodowiska-naukowego-do-ke-ws-budowy-muru-na-granicy-polsko-bialoruskiej/>

<https://www.politico.eu/article/polands-bison-unfriendly-border-barrier/>

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



COMPLAINT FORM

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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

First name: ...Olga.....

Surname(s) ... Volkova.....

On behalf of (if applicable):NGO Ecological Initiative....

Date : 24 February 2022

Electronic Signature

DocuSigned by:

C80E6B00842B419...

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).

We appeal to you because of the situation at the Belarusian-Polish with the construction of the fence. Such an obstacle will threaten the conservation of the most prominent Emerald network site BY0000002 "Belovezhskaya Pushcha", which is also the transboundary UNESCO World Heritage site "Belovezhskaya Pushcha".

A wall of 5.5 meters high and 180 kilometers long (more than 50 km in the middle of the National park "Belovezhskaya Pushcha") with barbed wire at the top and alongside will become a deathly treat to the unique fauna species of the site.

The construction of these engineering structures is not in line with the provisions of the Convention, in particular, art.4 ("Protection of habitats").

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)

Installation of the fence dividing the habitats of the rare mammal species is taking place on the territory of the Belovezhskaya Pushcha, on the border between Poland and Belarus. Such Bern Convention species as Barbastelle bat (*Barbastella barbastellus*), European bison (*Bison bonasus*), wolf (*Canis lupus*), Eurasian Beaver (*Castor fiber*), Eurasian Otter (*Lutra lutra*), lynx (*Lynx lynx*), pond bat (*Myotis dasycneme*) are under risk as well as other species such as Elk, Wild Boar, Deer and others, which are not listed in the convention but form an important part of the habitats vital for the survival of the unique biodiversity of the region regardless the country borders.

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

The artificial barrier with a barbed wire might have adverse effect the for populations of ungulates and predatory mammals. It deprives wild animals of freedom of movement and poses a serious threat to their conservation. The result will be decrease of biological diversity of the region that will impact not only Belarus but also Poland.

Installation of the barbed wire will cause injuries in wild animals that will make them suffer and die.

We believe that the Council of Europe will get concerned with this situation. We hope for your just and open monitoring of the situation. A fact-finding mission of experts could be one of the possible solutions.

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?

NATURA 2000, Emerald network site

UNESCO World Heritage site

The Convention Concerning the Protection of the World Cultural and Natural Heritage.

The Convention on Biological Diversity.

The Convention on the Conservation of Migratory Species of Wild Animals.

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

Environmental Impact Assessment of this barrier has not been performed. No mitigation measures have been developed.

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

No.

Convention on the Conservation of
European Wildlife
and Natural Habitats



COMPLAINT FORM

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Bern Convention Secretariat
Directorate of Democratic Participation
Council of Europe
F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name: Aliaksandr

Surname(s) Korbud

On behalf of (if applicable): Ministry of Natural Resources and Environmental Protection of the Republic of Belarus

Date : 28.02.2022 r.

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 construction of a concrete and steel fence up to 5.5 meters high and 180 kilometers long on the border between Poland and Belarus will cause severe damage to the transboundary UNESCO World Heritage Site "Belovezhskaya Pushcha". The construction of such a structure will require a significant amount of work: filling the road surface for heavy equipment, concreting the foundation, and so on. In the absence of culverts and migration corridors in the required places, such a wall will become an insurmountable barrier to the various species of wild animals migrating in the transboundary zone on the World Heritage Site.

The construction of the barrier will be associated with the fragmentation of the forest complex and protected habitats, the rupture of transboundary ecological corridors; cutting down the adjacent strip of relict forests on the Polish side of the Site; destruction of living ground cover during construction work; violation of the hydrological regime of adjacent ecosystems; blocking migration routes and seasonal movements of animals and subsequent depletion of the gene pool of their populations; the emergence of new pathways for the penetration of alien plant species into natural ecosystems

These actions of the Polish side are contrary to the basic principles and provisions of the Berne Convention, in particular, Art.4 ("Protection of Habitats") and Art.10 ("Special provisions for migratory species").

In our opinion, the situation requires immediate intervention and reaction.

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)

The UNESCO World Heritage site includes the natural habitat of the European Bison and Lynx, listed in Appendix III - Protected Species of Fauna.

The construction of fences by Poland also affects Deer, Badger, Roe deer, Fallow deer, Elk, Wild boar, Brown bear, Wolf, Otter, Black grouse, Capercaillie, etc.

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

The creation of an artificial obstacle in the form of a fence and barbed wire negatively affects the state of populations of ungulates (bison, deer, roe deer) and predatory mammals (bears, wolves, badgers, foxes, etc.) due to loss of habitat, lack of access to food, habitat disturbance reproduction, deprivation of the possibility of migration, safe passage of the border, etc.

The construction of fences deprives animals of freedom of movement and poses a serious threat to the sustainable existence and conservation of populations, especially species listed in the Red Data Book (bison, lynx, badger).

In particular, the number of lynx in "Belovezhskaya Pushcha" has been stably low for a long time, despite its high conservation status on both sides of the state border. The total number of 25 individuals in "Belovezhskaya Pushcha" does not allow the population to exist without constant genetic exchange with neighboring groups. The creation of a new barrier threatens the long-term existence of a stable group of this species in "Belovezhskaya Pushcha" due to genetic degeneration.

The Belarusian side has information about the facts of the death of large mammals: bison, deer and roe deer.

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?

The Polish authorities violate the provisions of the following international treaties: the Bern Convention on the Conservation of European Wildlife and Natural Habitats, the Convention on Biological Diversity, the Convention on the Protection of Migratory Species of Wild Animals, the Convention on the Protection of the World Cultural and Natural Heritage, the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Matters relating to the environment (Aarhus Convention).

Despite the fact that this facility is not included in the list of facilities subject to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), according to this convention, the environmental impact assessment procedure (including public discussions) of potentially hazardous projects should be carried out not only within the state, but also in neighboring countries that may be affected by the impact of these objects. In accordance with the Convention, the assessment procedure should be carried out at the early stages of planning.

Species and habitats of "Belovezhskaya Pushcha" are protected by the Emerald Network, European Diploma for Specially Protected Natural Areas, NATURA 2000, part of Belovezhskaya Pushcha is a RAMSAR protected area.

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

There is no official information from the Polish side on the procedures for assessing the possible impact of the proposed activity on the environment. At the same time, at the end of January 2022, the State Control Committee of Belarus began an inspection of the Belarusian part of "Belovezhskaya Pushcha" to clarify the damage caused by Poland's actions.

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

<https://theconversation.com/polands-border-wall-will-cut-europes-oldest-forest-in-half-173735>

More than 150 non-governmental organisations are asking the European Commission to intervene the halt the construction of a wall on the Polish-Belarusian border running through protected areas, including one of Europe's last primeval forests -

<https://www.reuters.com/business/environment/ngos-ask-eu-stop-poland-building-border-wall-primeval-forest-2022-02-08/>

<https://scienceinpoland.pl/en/news/news%2C90359%2Cpolish-researchers-warn-threat-border-wall-belarus-will-bring-forest-wildlife.html>

State Border Committee of the Republic of Belarus reports the deaths of animals --

<https://gpk.gov.by/news/gpk/137537/>

<https://gpk.gov.by/news/gpk/135380/>

**Convention on the Conservation of
European Wildlife
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Bern Convention Secretariat
Directorate of Democratic Participation
Council of Europe
F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name: ...Andrei.....

Surname(s) ...Khliavinski.....

On behalf of (if applicable): . Belarusian Public Association "Development - XXI century"

Date : 04 March 2022

Electronic Signature

B6AABD5AA404404

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).

We appeal you because of the situation developed at the Belarusian-Polish border and related to the construction of engineering structures. Such a fence will strongly damage the transboundary UNESCO World Heritage site "Belovezhskaya Pushcha".

A wall of 5.5 meters high and 180 kilometers long (more than 50 km within the national park "Belovezhskaya Pushcha") with barbed wire at the top and alongside will damage a unique fauna..

These actions contradict the provisions of the Convention, in particular, art.4 ("Protection of habitats").

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)

Installation of the fence takes place at the area of the Belovezhskaya Pushcha, at the border between Poland and Belarus. Lynx, European bison, Tour, Elk, Boar, Deer and others are under risks.

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

The artificial barrier with a barbed wire might have negative effects for populations of ungulates and predatory mammals. It deprives wild animals of freedom of movement and poses a serious threat to their sustainable existence. The result will be a decrease in genetic variability of species.

Installation of the barbed wire provokes injuries and deaths of the rare species.

We believe that the Council of Europe cannot ignore the situation. Monitoring of the situation is needed. We think that a fact-finding mission could be one of the solutions.

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?

NATURA 2000, Emerald network site

The Convention Concerning the Protection of the World Cultural and Natural Heritage.

The Convention on Biological Diversity.

The Convention on the Conservation of Migratory Species of Wild Animals.

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

Any Environmental Impact Assessment of this barrier has not been carried out. Any mechanisms to minimize its negative impact have not been announced.

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

No.

Convention on the Conservation of
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Bern Convention Secretariat
Directorate of Democratic Participation
Council of Europe
F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

First name: Andrei.....

Surname(s)...Pinihin.....

On behalf of (if applicable): Chairman of the Public Association "Green Economy"

Date : 15/03/2022

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).

We appeal you because of the situation developed at the Belarusian-Polish border and related to the construction of engineering structures. Such a fence will strongly damage the transboundary UNESCO World Heritage site "Belovezhskaya Pushcha".

A wall of 5.5 meters high and 180 kilometers long (more than 50 km within the national park "Belovezhskaya Pushcha") with barbed wire at the top and alongside will damage a unique fauna.

These actions contradict the provisions of the Convention, in particular, art.4 ("Protection of habitats").

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Installation of the barbed wire provokes injuries and deaths of the rare species.

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NATURA 2000, Emerald network site

The Convention Concerning the Protection of the World Cultural and Natural Heritage.

The Convention on Biological Diversity.

The Convention on the Conservation of Migratory Species of Wild Animals.

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

Any Environmental Impact Assessment of this barrier has not been carried out. Any mechanisms to minimize its negative impact have not been announced.

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

No.