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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

41st meeting
Strasbourg, 30 November – 3 December 2021

Other complaint: 2020/04

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

- REPORT BY THE COMPLAINANT -

*Document prepared by the
“EcoLur” Informational NGO, Armenian Forests NGO, Green Armenia Environmental Education NGO,
CEE Bankwatch Network*

Ms. Ursula Sticker - Secretary of the Bern Convention
Mr. Marc Hory - Project Manager
Mr. Eoghan Kelly - Project Assistant
Ms. Véronique De Cussac - Administrative Assistant

Subject: Complaint No. 2020/04: Armenia: The Amulsar gold mine project and its impacts on Emerald Network sites.

DEAR MS. STICKER,
DEAR MR. KELLY,
DEAR MR. HORY,
DEAR MS. DE CUSSAC,

Hereby we send you an update by the complainants relevant to the Complaint No. 2020/04: Armenia: The Amulsar gold mine project and its impacts on Emerald Network sites.

In the last months there has been pressure to re-open the Amulsar gold mine. The Amulsar mine construction and possible further impacts to the Emerald network should not proceed in breach of the Convention - up to date there has been no appropriate assessment on the potential negative impacts on numerous species and habitats that the project could bring, especially affecting three candidate Emerald Network sites.

Additionally, resuming mine construction and starting mining activities would be in violation of Article 5 and 6 of the Bern Convention as there is scientific proof that protected species of flora from Appendix I and fauna from Appendix II are present at Amulsar. Such proof is presented to the project promoter and the Armenian government in numerous documents including the Environmental and Social Impact Assessment of the project¹, WWF Armenia's position statement² and CEE Bankwatch Network/Balkani Wildlife Society report³. Consequently, mining activities will mean "*deliberate picking, collecting, cutting or uprooting of such plants*" (prohibited in Article 5) and "*deliberate damage to or destruction of breeding or resting sites (...); deliberate disturbance of wild fauna*" (prohibited in Article 6).

Regarding changes to the country's Emerald Network we would like to point out that:

- Any changes to the borders of the Emerald sites should be planned taking into account only scientific criteria according to the Recommendations of the Convention;
- All stakeholders should be involved in the process: Armenian government, Bern Convention, scientific community, NGOs and landowners representatives. The only fora where this would be possible are new biogeographical seminars where sufficiency of the network is evaluated;
- These changes should not contradict the obligations of Armenia to adopt and protect the candidate sites according to the national legislation. All three Emerald sites potentially impacted by the project are candidate sites.⁴

We fully agree with the Bern Convention Bureau request from September 2020 that the authorities halt any developments that can negatively affect the habitats and species protected under the Convention, whether it pertains to an Emerald Network site or not.

¹ <https://www.ebrd.com/work-with-us/projects/esia/dif-lydian-amulsar-gold-mine-extension.html>

² https://www.panda.org/wwf_offices/armenia/news/?353290/WWF-Armenias-Position-Statement-on-Amulsar-Gold-Bearing-Quartzite-Mine

³ <https://bankwatch.org/publication/biodiversity-offsetting-and-other-problems-of-the-esia-of-amulsar-gold-project-in-armenia>

⁴ <https://rm.coe.int/updated-list-of-officially-nominated-candidate-emerald-sites-2020/1680a080d4>

This request is even more important taking into account the recent impacts on habitats and species, including by extensive forest fires reported⁵.

Please share with us any changes to Emerald site borders proposed by the Armenian government and any reports specifically responding to the issue of the Amulsar gold mine.

Best regards,

Mr. Andrey Ralev

On behalf of the complainants “EcoLur” Informational NGO, Armenian Forests NGO, Green Armenia Environmental Education NGO, CEE Bankwatch Network.

⁵ <https://english.arnika.org/news/biodiversity-of-nagorno-karabakhs-forests-in-danger-because-of-extensive-fires-armenian-ngos-seeking-support>