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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: 2018/6

**Presumed threats to Emerald Network sites
“Olmanskiye bolota” (BY0000012) and “Topila Bog”
site (BY0000083)
(Belarus)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
NGO Bahna, Belarus*



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ГРАМАДСКАЯ АРГАНІЗАЦЫЯ
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Ms. Ursula Sticker
Secretary of the Bern Convention
Council of Europe, Avenue de l'Europe
F-67075 Strasbourg Cedex
France

Brest, 28th of February 2021

Subject: Complaint No. 2018/6: Other complaint: Belarus: Presumed threats to Emerald Network sites Olmanskiye bolota (BY0000012) and Topila Bog (BY0000083)

Dear Ms. Sticker,

Hereby, I would like to comment on the Report by the government prepared by the Ministry of Natural Resources, Belarus (T-PVS/Files(2020)46).

1

“Forest road No. 4: EIA was carried out, including public hearings from 14th October 2016 to 14th November 2016. A positive conclusion of the SEE of 23rd December 2016 No. 139, a positive conclusion of the state expertise of 17.01.2017 No. 623-17/16 were obtained.

The facility is currently under construction. There are no further plans to design roads in the specified forestry, according to the information of the State Forestry Institution “Palieski Forestry”.”

Comment: It should be noted that the Forest road No. 4 is planned for construction within the Emerald Network site Olmanskiye bolota (BY0000012) and might also have a significant impact on its hydrological regime, flora, fauna and biotopes. However, according to the State Forestry Institution “Palieski Forestry” and the Brest State Industrial Forestry Institution, the construction of this road has been cancelled.

2

“During the construction work, there were cases of unauthorized open-pit mining of widespread mineral deposits (sand). Such pits in the amount of eight (8) were identified by the Stolin District Inspection of Natural Resources and Environmental Protection during a scheduled inspection of the State Forestry Institution “Palieski Forestry” in 2017, in connection with the identification of signs of criminal offenses, the case files were given to the law-enforcement agencies, on the basis of which a criminal case was initiated by the Stolin District Department of the Investigative Committee of the Republic of Belarus on 16th November 2017. Taking into account that the Report of environmental NGOs indicates that “several criminal cases were open after public campaign and complaint”, it should be noted that the first NGOs

complaints were obtained by the territorial bodies of the Ministry of Natural Resources in August 2018.”

Comment: It should be noted that in accordance with the official letter from the Stolin District Executive Committee (dated 18.07.2018 No. 10-340) there were no identified facts of unauthorized open-pit mining on the territory of Stolin District for the period 2016-2018. However, in October 2018 in a response (letter from Brest Regional Committee of Natural Resources and Environmental Protection dated 22.11.2018 No. 06-25/2326) to our letter with information about the unauthorized open-pit mining identified by us, they revealed that on 16.11.2017 a criminal case has been initiated and is being investigated concerning three open-pit mining sites. It was also stated that the Stolin District Inspection of Natural Resources and Environmental Protection identified this activity in 2017. It is highly unlikely that in July 2018 the local executive authorities (Stolin District Executive Committee), to which the Stolin District Inspection of Natural Resources and Environmental Protection is subordinate, were not aware that a criminal case on the three open-pit mining sites was opened in 2017.

For the other facts of illegal open-pit mining sites identified by us in 2018, the criminal case (in accordance with the letter of the Brest Regional Committee of Natural Resources and Environmental Protection from 14.08.2019 No. 03-2-2/2056) was initiated only in 2019, after our numerous appeals. Furthermore, only after our repeated appeal, the Prosecutor's Office of Gomel region confirmed violations of land and environmental legislation in the construction of road No. 3 (development of two open-pit mining sites on the territory of Lelchitsy district, including the territory of Emerald Network site Topila Bog (BY0000083).

3

“To implement the decisions made by the coordinating council, using budget funds of the Brest region, the Unitary Consulting Enterprise “APB-Birdlife Wetland Centre” conducted a survey of the habitats of wild animals transferred under protection in the Stolin district, belonging to the species included in the Red Book of the Republic of Belarus, as well as those subject to international treaties of the Republic of Belarus, including the Bern Convention (hereinafter – wild animals) in 2019. Based on the results of these works, the territorial bodies of the Ministry of Natural Resources did not receive draft protection documents for new habitats of wild animals.”

Comment: I would like to point out that the above-mentioned surveys were indeed carried out, but outside the territory of Olmanskiye bolota.

In general, it should be noted that the results of our monitoring in 2020 have not detected any new facts of road construction or illegal mining sites in the territory of Olmanskiye bolota.

Yours sincerely,
Y. Yankevich

prepared by
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