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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

40<sup>th</sup> meeting  
Strasbourg, 1-4 December 2020

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**Other Complaints:**

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

**- REPORT BY THE GOVERNMENT -**

*Document prepared by  
the Ministry of Natural Resources, Belarus*

*Unofficial translation*

Secretary of the  
Bern Convention

**Subject: Presumed threats to Emerald Network sites Olmanskiye bolota (BY0000012) and Topila Bog (BY0000083)**

The Ministry of Natural Resources and Environmental Protection of the Republic of Belarus (hereinafter – the Ministry of Natural Resources) presents its compliments to the Secretary of the Bern Convention and would like to provide information regarding the issues indicated in the letter of the Secretary of the Bern Convention dated 11<sup>th</sup> May 2020 and in the Report of environmental non-governmental organizations on threats to Emerald Network sites “Olmanskiye bolota” (BY0000012) and “Topila Bog” (BY0000083) T-PVS/Files(2020)16 (hereinafter – the environmental NGOs Report), in addition to the information provided in the letter of the Ministry of Natural Resources dated 25<sup>th</sup> June 2019 No. 10-2-11/241-ino.

The construction object “**Construction of a border road along the border control line for the department of the Border Service “Rechitsa” of Military Unit 1235**” (start-up facilities No. 1, 2 and 3): an environmental impact assessment (hereinafter – EIA) was carried out, the EIA report was approved on 20<sup>th</sup> May 2015. A positive conclusion of the state ecological expertise (hereinafter – SEE) of 22<sup>nd</sup> June 2015 No. 55, the conclusion of the state expertise of 17<sup>th</sup> July 2015 No. 376/17-15 and addition to it of 24<sup>th</sup> November 2016 No. 686/17-16 were obtained. The facility was commissioned on 22<sup>nd</sup> June 2017 (start-up facilities No. 1 and 2) and 16<sup>th</sup> November 2018 (start-up facility No. 3).

The construction object “**Construction of a power line with transformer substations to the Border Guard Stations “Mutvitsa” and “Khinichev” on the Pinsk Border Detachment site**”: an EIA was carried out, including public hearings in the period from 19<sup>th</sup> August 2019 to 19 September 2019 in the Lelchitsy district of the Gomel region and from 10<sup>th</sup> December 2019 to 8<sup>th</sup> January 2020 in the Stolin district of the Brest region. The set of pre-project documents for the submission to the SEE are currently being prepared.

In order to **demarcate the state border**, the International Organization for Migration and the State Border Committee of the Republic of Belarus plan to carry out demarcation to clear the 5-meter strip of tree and shrub vegetation, the installation of border signs and the possible construction of engineering structures (gates, pedestrian bridges) in wetlands, including both for carrying out demarcation and subsequently to ensure security of the state border. The proposed activities will be implemented within the framework of the European Union international technical assistance joint project “Supporting the Demarcation of the Belarus-Ukraine frontier” in 2021 – 2023.

**Forest road No. 1:** a positive conclusion from the SEE of 11<sup>th</sup> March 2012 No. 19 is obtained. The EIA was not carried out in accordance with the existing legislation in the field of SEE. The facility was commissioned on 31<sup>st</sup> December 2014.

**Forest road No. 2:** an EIA was carried out, including public hearings from 17<sup>th</sup> July 2015 to 17<sup>th</sup> August 2015. A positive conclusion of the state expertise of 10<sup>th</sup> November 2015 No. 615-17/15 was obtained. The facility was commissioned on 31<sup>st</sup> May 2017.

**Forest road No. 3:** an EIA was carried out, including public hearings from 18.03.2016 to 18.04.2016. A positive conclusion of the SEE of 29<sup>th</sup> April 2016 No. 307-20/16 and amendment to it of 27<sup>th</sup> April 2017 No. 382/2017, a positive conclusion of the state expertise of 26<sup>th</sup> May 2016 No. 307-20/16 and an addition to it of 27<sup>th</sup> April 2017 No. 269-20/17 were obtained. The facility was commissioned on 24<sup>th</sup> December 2019.

During the construction of these roads, in order to prevent changes in the hydrology of the adjacent territories, culverts in the amount of 5, 8 and 12 respectively were arranged.

One of the key challenges of the territory of the Emerald Network sites Olmanskiye bolota (BY0000012) are fire events in natural ecosystems, the threat of which is exacerbated by climate change. The construction of these forestry roads has led to the fourfold reduction of the arrival time of fire-fighting teams of the forest service and the Ministry of Emergency Situations at the fire sites, and allowed to use not only all-terrain vehicles, but also other fire-fighting equipment when extinguishing the fire.

**Forest road No. 4:** EIA was carried out, including public hearings from 14<sup>th</sup> October 2016 to 14<sup>th</sup> November 2016. A positive conclusion of the SEE of 23<sup>rd</sup> 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”.

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 Stolín 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 Stolín District Department of the Investigative Committee of the Republic of Belarus on 16<sup>th</sup> 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.

Furthermore, a number of pits were excavated legally, based on the relevant decisions of the district executive committees. At the same time, the territorial bodies of the Ministry of Natural Resources revealed violations of environmental legislation, for which the liable persons were subjected to administrative liability.

The pits have been currently reclaimed (acts of acceptance and transfer of reclaimed sites have been approved), including 7 pits for natural regrowth, 3 pits for forest plantations, 1 pit for a pond.

Meetings with the participation of representatives of the Ministry of Natural Resources, the Brest Regional Committee of Natural Resources and Environmental Protection, the Prosecutor's Office of the Brest Region, the Brest State Industrial Forestry Institution, the Stolín District Executive Committee, the State Forestry Institution “Palieski Forestry”, the design organization UKP “Brestdorproekt”, the State Scientific Institution “The Polesie Agrarian Ecological Institute of the National Academy of Sciences of Belarus”, non-governmental organizations APB-BirdLife Belarus, Bahna, Ecohome, and local residents were repeatedly held on these construction sites.

A meeting of the Public Coordinating Ecological Council at the Brest Regional Committee of Natural Resources and Environmental Protection was held on 5<sup>th</sup> September 2018 in order to prevent violation of environmental legislation. The results of the meeting were covered in the media.

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 Stolín 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.

Currently, the habitats of wild animals (common weasel *Mustela erminea*, hazel dormouse *Muscardinus avellanarius*, edible dormouse *Glis glis*, brock *Meles meles*, eagle owl *Bubo bubo*, Boros schneideri *Boros schneideri*, short-toed eagle *Circaetus gallicus*, three-toed woodpecker *Picoides tridactylus*, smooth snake *Coronella austriaca*, spotted eagle *Clanga clanga*) and rare biotopes located on the territory of

the Emerald Network sites Olmanskiye bolota (BY0000012) are being transferred under protection on the basis of draft protection documents prepared by the State Research and Production Association “Scientific and Practical Centre for Bioresources National Academy of Sciences”.

The Brest and Gomel Regional Committees of Natural Resources and Environmental Protection constantly monitor compliance with environmental legislation in the territory of Emerald Network sites Olmanskiye bolota (BY0000012) and Topila Bog (BY0000083), actions are taken to prosecute liable persons in case of violations.

Furthermore, we would like to inform you that the joint project “Polesia – Wilderness Without Borders: Protecting one of Europe’s largest natural landscapes” implemented by the “APB-Birdlife Wetland Centre” NGO (Belarus) and the Frankfurt Zoological Society (Germany) provides a number of activities aimed at protecting the Emerald Network sites located on the Polesia and their management, including the preparation of a new management plan for the Nature Reserve of National Significance “Olmanskiye bolota” (Emerald Network site BY0000012), granting national protection status to other territories of the Emerald Network sites, restoration of disturbed ecosystems, etc.

The representatives of the aforementioned Project discussed, among others, the possible preparation of an application for inclusion of Pripyat Polesia in the UNESCO World Heritage List. However, a decision on this issue has not been made yet, it requires additional study (compliance with the criteria of the World Heritage List, national and international procedures for the preparation of an application, the boundaries of the territory included, etc.).

The Ministry of Natural Resources expresses its gratitude to the Secretary of the Bern Convention for the continuous support of the efforts undertaken by the Republic of Belarus in the development of the European Emerald Network sites. We got involved in this process even before the accession of the Republic of Belarus to the Bern Convention in 2013, and to date, the Standing Committee has included 155 territories in our country with a total area of 2.3 million hectares in the Emerald Network sites, which is 11.1% of the territory of Belarus.

The process of development of the Emerald Network continues, but we are already facing another equally important issue – the organization of proper management of these territories, taking into account the factors of natural (primarily climate change) and anthropogenic nature that have impact on their condition.

While preparing the Project “Biodiversity in Belarus: Planned to conserve”, our proposal to include in the Project activities on developing national approaches to organize the management of the Emerald Network sites was not supported, which, inter alia, does not allow the full implementation of Recommendation No. 208 (2019) of the Standing Committee on detecting, reporting, assessing and responding to changes in the ecological character of Emerald Network sites.

At the same time, we hold out hope for continuing cooperation with the Bern Convention for the development of the Emerald Network in the Republic of Belarus within the framework of the European Union for Environment (EU4Environment) Action.

We would like to take this opportunity to express our highest consideration to the Secretary of the Bern Convention.

First Deputy Minister

Baliaslau Pirshtuk