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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

40th meeting
Strasbourg, 1-4 December 2020

Other complaints

**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 NGO, CEE Bankwatch Network*

To: Secretariat and Bureau of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)

DEAR SECRETARIAT AND BUREAU MEMBERS,

We are concerned about the report of the Armenian authorities from July 21st, 2020 regarding Complaint 2020/04: The Amulsar gold mine project and its impacts on Emerald Network sites.

On behalf of “EcoLur” Informational NGO, Armenian Forests NGO, Green Armenia NGO and CEE Bankwatch Network I would like to ask the Bureau **to include the complaint in the agenda of the next Standing Committee meeting** for the following reasons:

1. The Armenian authorities have initiated "review and optimization" of officially proposed and nominated candidate Emerald sites¹, which have been evaluated at biogeographical level and confirmed as meeting the criteria to be essential part of the Emerald Network. The motives of the authorities for the "review and optimization" of the sites are not scientific but political ("not agreed with Ministry of Environment", whilst the national authorities were the only ones able to submit the site proposals, using the Common Data Repository²) or economic ("industrial and economic activities are underway").
2. There is no answer by the authorities regarding the impacts of the Amulsar Gold Project on habitats and species protected in the proposed Emerald sites and to the lack of proper assessment of a project impacting the coherence of the Emerald Network.
3. In the last weeks there have been confrontations and violent clashes between protesters and the Amulsar project's security forces, with the intervention of the police. There is concern that the project's security will provoke further clashes and violence, with the intention of regaining access to the project site. The serious conflicts surrounding the project are deepening and we are concerned about further social and environmental impacts³.

Best regards,

Andrey Ralev

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

¹<https://rm.coe.int/updated-list-of-officially-nominated-candidate-emerald-sites-december-/168098ef50>

²<https://rm.coe.int/168074669d>

³<https://www.ecolur.org/en/news/amulsar/---/12577/>