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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

41<sup>st</sup> meeting  
Strasbourg, 30 November – 3 December 2021

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**Other Complaint: 2019/01**

**Possible negative effect of hydrocarbons  
extraction in Emerald sites Sviati Hory  
(UA0000029), Iziumska Luka Regional  
landscape Park (UA0000073), Ukrainskyi  
Stepovyi Nature Reserve (UA0000019), and  
Riznykivskyi (UA0000219) (Ukraine)**

**- REPORT BY THE COMPLAINANT -**

*Document prepared by  
Environment-People-Law, Ukraine*

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Hydrocarbons Sharing Agreements within the Yuzivska Area between the State of Ukraine, represented by the Cabinet of Ministers of Ukraine, and Shell Exploration and Production Ukraine Investments (IV) BV and Ltd “Nadra Ukraine” (hereinafter referred to as the Agreement) signed on January 24, 2013.

The time of a positive ecological conclusion about the possibility of gas production on Yuzivska Square ended in 2016 [https://unece.org/DAM/env/pp/compliance/C2015-118\\_Ukraine/Add.25\\_UKR.pdf](https://unece.org/DAM/env/pp/compliance/C2015-118_Ukraine/Add.25_UKR.pdf)

At the legislative level, the situation regarding the conclusion of production sharing agreements has not changed. The EPL seeks to legislate clear steps for strategic environmental assessment and environmental impact assessment.

However, even the current norms on environmental assessments do not allow for the extraction of gas and oil without environmental assessments. Accordingly, the agreement concluded in December 2020 on the purchase of Nadra Yuzivska LLC by Naftogaz does not allow the extraction of gas without conducting environmental assessments.