



Strasbourg, 14 May 2025

T-PVS(2025)04

**CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS**

Standing Committee
45th meeting

Bureau meeting

8th-10th April 2025
(Strasbourg)

- MEETING REPORT -

*Document prepared by
the Secretariat of the Bern Convention*

1. OPENING OF THE MEETING & ADOPTION OF THE AGENDA

The Chair of the Standing Committee to the Bern Convention, Mr Carl Amirgulashvili, opened the first ordinary meeting of the Bureau of the Standing Committee to the Bern Convention for 2025.

1.1. Adoption of the agenda

The Chair presented the agenda to the Bureau members.

Decision: The meeting agenda was adopted (See Appendix I).

2. REPORT FROM THE SECRETARIAT

2.1. Follow up on the Summit of the Heads of State and Government of the Council of Europe on 16-17 May 2023 in Reykjavík, Iceland

- Ad hoc Multidisciplinary Group on the Environment (GME)

The Secretariat updated the Bureau on the latest developments subsequent to the Reykjavik Summit, in particular the work of the GME on a Council of Europe Strategy on the Environment and its Action Plan. The Bureau was informed that the GME held two plenary meetings in 2025 (11-13 February and 10-12 March 2025). The GME finalised and adopted the draft Council of Europe Strategy on the Environment and took note of its related Action Plan. These two documents were subsequently transmitted to the Council of Europe Committee of Ministers' Rapporteur Group on Human Rights (GR-H) for review at their meeting of 27 March 2025 and to the 1524th meeting of the Ministers' Deputies (2 April 2025). Ultimately, the Ministers' Deputies approved the draft Strategy and took note of the Action Plan, agreeing to transmit them to the Committee of Ministers for it to adopt the Strategy and take note of the Action Plan at its 134th Ministerial Session in Luxembourg on 14 May 2025. The draft Strategy and Action Plan form part of a comprehensive "environment package" that will be considered during the Ministerial Session in Luxembourg.

Decision: The Bureau took note of the information provided. It thanked its former Chair, Ms Merike Linnamägi, for her continued contribution to the meetings of the GME as the representative of the Bern Convention. The Bureau asked to be kept informed of future developments, in particular regarding the outcome of the Ministerial Session on 14 May 2025, in Luxembourg, and the decisions of the CM regarding the "environment package". It also requested the Secretariat to circulate the Strategy once adopted to the members, participants and observers of the Standing Committee, together with its accompanying Action Plan.

2.2. Staff announcements

The current Secretary of the Standing Committee of the Bern Convention, Mr Mikaël Poutiers, informed the Bureau that he was appointed Co-Secretary of the Ad Hoc Multidisciplinary Group on the Environment (GME) on 1st January 2025. He will continue in the Secretary role on the Standing Committee of the Bern Convention *ad interim* until 1 June 2025, at which point the new Secretary, Ms Alessandra Siino, will take up her duties.

The Bureau held an exchange with Ms Siino to welcome her and take the opportunity to introduce themselves to each other.

Decision: The Bureau thanked Mr Poutiers for his commitment and contribution to the work of the Bern Convention and wished him the best in his new role. It welcomed Ms Siino in her new role within the secretariat.

3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION

3.1. Voluntary contributions received in 2024 and 2025: state of play

The Secretariat presented the final state of play of the voluntary contributions for 2024 and an initial one for 2025. In 2024, 14 Parties had contributed €258,023, a significant decrease from the 18 Parties and €387,919 received in 2023, or approximately €130,000 less than the previous year. Four contributions were received following the 44th meeting of the Standing Committee.

The Secretariat reported that as of March 2024, only one Contracting Party had made a voluntary contribution, while by the same period in 2025, two Contracting Parties had already contributed, further to the letter sent in January by the Chair inviting parties to contribute.

Several reasons may explain this decrease: global economic challenges, changing political priorities that may affect financial commitments to environmental policies, wildlife conservation, and natural habitats, the complexity of administrative procedures, and differing levels of commitment among some Contracting Parties.

To address this downward trend, the Secretariat proposed the preparation of an annual report to be published on the Convention website highlighting the results achieved by the Convention, which would allow for assessment of the relevance of voluntary contributions, their direct impact, and the value of the support of States Parties sending voluntary contributions. This document could include a list of the Contracting parties which sent contributions each year.

Finally, it was suggested that other sources of funding, such as foundation grants, be explored.

Decision: The Bureau took note of the state of play regarding the voluntary contributions received and thanked the Contracting Parties which had already provided a voluntary contribution. It recalled that the Convention was still dependent on the voluntary financial support of its Parties. It further called on Contracting Parties to pay a voluntary contribution or to expedite the procedures for providing their contributions.

The Bureau observed that financial support for environmental policies is decreasing worldwide due to the recent geopolitical developments, and that similar effects can also be observed in other international conventions.

The Bureau mandated the Secretariat to draft a reminder letter, signed by the Chair of the Standing Committee, inviting Parties which have not done so to consider paying a voluntary contribution, and those Parties which had already done so to explore the possibility of paying additional contributions, where unspent funds remain available, in order to increase the visibility of the existence of this financial system. The letter would highlight activities which would require funding. It would be sent to national focal points but also to the permanent representations of the parties to the Convention, asking them to forward it to their environment ministries.

The Bureau approved the idea to publish an annual report detailing the results achieved by the Convention and to consider methods to diversify the sources of funding.

3.2. Report on the use of the resources from the Special Account of the Bern Convention

The Secretariat informed the Bureau that the report on the use of voluntary contributions was sent to donors in March 2025. It recalled that the ordinary budget of the Bern Convention had been substantially increased in November 2023 and that the programme of activities was therefore a little less reliant on voluntary contributions than it had been in preceding years. Nevertheless, uncertainty about the funding of the Reykjavik Process could still pose a challenge to the resources from the ordinary budget allocated to the Bern Convention.

The Secretariat informed the Bureau that some meetings and activities scheduled for 2025 were expected to be funded from the Special account. Furthermore, two staff positions were still funded with voluntary contributions.

Decision: The Bureau took note of the information provided.

3.3. Working Group on overseeing implementation of the Strategic Plan

The Bureau was informed that the Working Group overseeing the implementation of the Strategic Plan met online on 20 February 2025, with a joint session with the *Ad hoc* Working Group on Reporting. The attendees reviewed and supported the workplan for 2025, which includes updating the "metadata" document for Strategic Plan indicators, developing the Monitoring & Evaluation Guide outline, and cooperating with experts on Protected Areas and Ecological Networks for the Emerald Network indicators.

The Working Group examined the 2025 draft questionnaire for national voluntary updates on the implementation of the Strategic Plan, maintaining its four questions about policy reflection, achievements, challenges, and priorities. Following the 44th Standing Committee's suggestion, the questionnaire now includes a request for publicising responses. To allow more time for replies, the timetable was adjusted as follows: the questionnaire will be issued on 30 April, responses will be due by 10 October, an English summary will be completed by 31 October, and final summaries in both languages posted by 7 November for the 45th Standing Committee meeting.

In the joint session with the *Ad hoc* Working Group on Reporting, members agreed on next steps for four indicators based on reporting outcomes under Resolution No. 8 (2012). They noted a number of limitations of the reporting exercise, such as incomplete participation of Contracting Parties, imbalanced/disproportionate focus on selected habitats and species, exclusion of bird species, voluntary marine feature reporting, and data reported at the biogeographical level, which may not fully reflect national implementation of the Strategic Plan. Despite these challenges, the Working Group remained committed to enhancing the Strategic Plan's implementation and improving reporting processes.

<p>Decision: The Bureau took note of the information provided.</p>

3.4. Working Group on exploring mechanisms to guide amendments to the appendices of the Bern Convention

The Secretariat informed the Bureau of the newly created Working Group on exploring mechanisms to guide amendments to the Bern Convention, which met for the first time online on 13 March 2025. The meeting attracted significant interest from many Contracting Parties and Observers.

Mr Simon Macknorn (United Kingdom), was elected as Chair. The group discussed the terms of Recommendation No. 56 (1997) which was the only existing guidance for amending the appendices of the Bern Convention. It noted its lack of clarity, and that it concerned only adding species to Appendices I and II, therefore addressing neither protection status changes nor Appendix III.

The Secretariat reported that participants in the Working Group agreed on the need for an evidence-based mechanism with scientific criteria. They suggested using standardised forms to introduce amendment proposals and involving a scientific body for their assessment. The group also reviewed mechanisms used by other conventions and emphasised distinguishing the process from the criteria. However, no consensus was reached on proposing criteria.

For the next meeting on 4 September 2025, they will prepare key documents, including a review of Recommendation No. 56 (1997), a summary of past amendments, and a revised mapping of amendment processes in other conventions. The aim is to present options to the 45th Standing Committee and seek a mandate to elaborate the process in detail.

<p>Decision: The Bureau took note of the information provided and highlighted the benefits and potential downsides of a scientific body.</p>

<p>It showed its support for the work of the Working Group on exploring mechanisms to guide amendments to the Bern Convention and looked forward to receiving their proposals, which it will consider at its Autumn meeting.</p>
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4. IMPLEMENTATION OF THE PROGRAMME OF ACTIVITIES AND BUDGET FOR 2025

4.1. European Diploma for Protected Areas

The Secretariat informed the Bureau on the annual meeting of the Group of Specialists (GoS) of the European Diploma, which will take place on 20 May 2025, at the Sierra Nevada National and Natural Park's headquarters in Granada, Spain. In this meeting the GoS will pay special attention to the areas in particular need of monitoring (7 areas), and will discuss 2 on-the-spot appraisal (OSA) visits: firstly, to the Sierra Nevada National Park, Natural Park and Biosphere Reserve (Spain) - a visit which is a first step before the possible award of the European Diploma, and, secondly, the first OSA to Gallipoli Cognato Regional Park (Italy) since it was awarded in September 2020.

This meeting will be followed on 21 May 2025 by the celebratory event of the 60th anniversary of the European Diploma Award for Protected Areas. It will include speeches from representatives of Spanish local, regional and national authorities, in the presence of Mr. Rafael Benítez, Director of Social Rights, Health and Environment at the Council of Europe, followed by thematic interventions on the role of protected areas in reversing the triple planetary crisis of climate change, pollution and loss of biodiversity. The event will end with the awarding ceremony of the European Diploma to the Regional Park Gallipoli Cognato.

The Secretariat also informed the Bureau of the state of play of the Roundtable of Managers of the Diploma holding areas (21-22 May 2025) which will take place after the Celebratory Event. Good practices and successful stories of conservation in European Diploma holding areas will be showcased in 5 thematic sessions. The roundtable will finish with the approval of the so-called *Granada Declaration*, stating the importance of the European Diploma, the values which it encompasses and challenges and opportunities for the future of the award and the Diploma holding sites.

Finally, the Secretariat informed the Bureau that a communication campaign called "The Natural Heart of Europe" has been set up as a byproduct of the 60th anniversary. It will showcase achievements in three fields: a) examples of successful restoration of habitat and species, b) the contribution of local communities to the protection of the area, as an example of democratic participation and equity between peers and c) how the Diploma holding areas benefit the well-being of people.

Decision: The Bureau took note of the information provided. It welcomed the preparation of the celebrations of the 60th anniversary of the European Diploma, as well as the communication campaign and the *Granada Declaration*.

4.2. Emerald Network: Workplan for 2025

The Secretariat informed the Bureau that, in response to the request of the 44th Standing Committee of the Bern Convention to assist the Contracting Parties in submitting updated Emerald Network databases in the coming years, country factsheets presenting the state of play of the Emerald Network had been prepared and shared with the Contracting Parties implementing the Emerald Network. The factsheets provide an overview of the historical development of the Emerald Network and identify possible areas for action that could help bringing the Network to achieve its objectives. Based on these factsheets, the Secretariat proposed targeted technical assistance to help update and improve the Emerald Network databases with a view to their submission to the Bern Convention.

In addition, the Bureau was informed that, as a follow-up to the mandate of the 44th Standing Committee, the revision of the Emerald Network Standard Data Form was underway, in order to keep it in line with the Natura 2000 Standard Data Form and to enable the development of the appropriate procedures needed for the designation of Emerald Network sites in the future. The proposed revisions highlighting the implications of new fields, whether they should be optional or mandatory, and their possible use for the operation of the relevant indicators of the Strategic Plan, will be submitted for consideration by the Group of Experts on Protected Areas and Ecological Networks, provisionally scheduled for 7-8 October 2025 in Montenegro.

It was recalled that the 44th Standing Committee adopted [Recommendation No. 225 \(2024\)](#) on the further clarification of the obligations of Contracting Parties regarding the conservation of Emerald

Network sites and supported the development of additional guidance in order to further clarify and/or concretise unclear aspects of the legal framework.

In this context, a compendium of international legal instruments, recommendation and guidelines related to “screening, prior assessment and authorisation of potentially damaging projects”, including regarding environmental and strategic impact assessments and taking into account Recommendation No. 208 (2019) on detecting, reporting, assessing and responding to changes in the ecological character of Emerald Network sites is being prepared and will be presented to the Group of Experts on Protected Areas and Ecological Networks.

The Secretariat concluded that, in view of the fact that several non-EU Contracting Parties have suspended the development of the Emerald Network and were engaged in a revision process, criteria for assessing changes in the Emerald Network providing objective indicators for accepting or rejecting changes in the Emerald Network were under preparation and would be presented to the Group of Experts on Protected Areas and Ecological Networks in October.

Decision: The Bureau took note of the information provided on the Emerald Network Work Plan for 2025. It stressed the crucial importance of this reporting.

4.3. Reporting under Resolution No. 8 (2012) on the conservation status of species and habitats

The Bureau was reminded that the format, guidelines and checklists of the species and habitats to be considered for the reporting under the conservation status of species and habitats were adopted by the 44th Standing Committee in December 2025.

The Secretariat informed the Bureau that work in 2025 will focus on adapting the Reportnet 3 delivery platform managed by the European Environment Agency so as to reflect the validation rules for reporting under [Resolution No. 8 \(2012\)](#) and on ensuring the compatibility of the range tool developed for the reporting.

It was highlighted that, in order to assist non-EU Contracting Parties in the preparation of the reporting, a webinar on the concepts of Favourable Reference Values, Future Trends and Habitat Condition, including a Questions and Answers session, will be held on 7 May 2025.

The Secretariat informed the Bureau that a hands-on training on the use of Reportnet 3 is also planned. Participants will be invited to prepare 2 sample reports to be submitted onto Reportnet 3. The training has been provisionally scheduled to coincide with the 7th meeting of the Ad Hoc Working Group on Reporting, which is currently scheduled for 4-5 November 2025.

Decision: The Bureau took note of the information provided. It welcomed the organisation of an online capacity-building workshop to assist non-EU Contracting Parties in preparing reports and improving the reporting system.

4.4. Joint meeting with the CMS MIKT on IKB and Group of Experts on the Conservation of Birds

The Secretariat informed the Bureau that, following the cancellation of the Joint meeting with the CMS MIKT on IKB and the meeting of the Group of Experts on the Conservation of Birds in 2024, the Joint meeting will be hosted by the CMS Secretariat at its headquarters in Bonn on 13-15 May 2025 and followed by the Group of Experts on 15 and 16 May at the same venue. Over 70 participants registered for the joint meeting on IKB (with over 40 persons attending in person). The meeting agenda includes topics of enforcement, use of new technologies in combatting IKB, collecting data within the scoreboard and the Rome Strategic Plan, preparing a mid-term evaluation of the implementation of the Rome Strategic Plan, sharing experience of national action plans.

A field trip to a nearby natural area will follow the meeting, organised for the participants of both meetings.

The meeting of the Group of Experts on the conservation of birds will gather over 40 participants, including 30 attending in-person. The experts will exchange on the national action plans for the

conservation of wild birds, share inspiring examples of measures implemented by the Parties, contribute to the shaping of a guidance tool to minimising the negative impact on wild birds while planning, developing and enhancing the solar and wind energy infrastructure, and the powerlines connecting them to the electrical grid. The Guidance tool will include principles to be respected and good practice examples.

Decision: The Bureau took note of the information about the upcoming meetings, welcoming a positive collaboration with the CMS MIKT Secretariat.

The Bureau recommended that the Secretariat seeks to hear from the Parties how relevant for them the IKB scoreboard is, so as to identify best ways to motivate the Parties to provide the requested data. Furthermore, external support with collecting the data should be considered to complete the picture, such as Tour du Valat database on IKB, to be open as of spring 2025.

Collaborating with the EC and combining all available elements, including the reasons for legal hunting and the situation of hunted species, as well as climate change, should be considered.

Regarding the Group of Experts on conservation of birds, the Bureau recommended that at the occasion of its meeting the group renews its mandate, reviews the previously addressed topic of lead ban and implementation of species action plans.

The Bureau considered the topic of the negative impact on birds of renewable energy infrastructures as appropriate to increase the importance of the work of the Group and recommended adequate reference to the existing EC guidelines on birds and wind and solar energy.

Finally, the Bureau was of the view that the Group of Experts on the conservation of birds deserves a better recognition and allocation of adequate financial and human resources due to the importance of the issues to be dealt with, amounting to an additional workload.

4.5. Follow-up to the decisions of the Standing Committee to downlist the wolf (*Canis lupus*) from Appendix II to Appendix III of the Convention

The Bureau was informed that the decision of the Standing Committee to downlist the wolf (*Canis lupus*) from Appendix II to Appendix III of the Convention came into force on 7 March 2025, despite the submission of 3 objections: from Czechia (for procedural reasons), Monaco and the UK.

Different processes related to the decision or stemming from its coming into force were then evoked, including: the complaint filed with the EU Ombudsman against the EU proposal to downlist the species, the complaint submitted to the European Court of Justice, the launching on 7 March 2025 of the procedure aimed at downlisting of the species within the Habitats Directive. Notably there were intense reactions from civil society – farmers, hunters, conservationists – for and against the downlisting, and an exceptionally high interest from the media.

The Bureau exchanged about the direct consequences and possible future implications of the downlisting, stressing that the legal obligations on the national level may be stricter than the protection status granted to the species under the Bern Convention as ratified by the individual Parties, with or without reservations. The Bureau discussed the diversity of realities across the geographical scope of the Convention, including issues concerning co-existence with the wolf, and of the need to ensure a favorable conservation status of the species, for the sake of which local/regional prohibitions of hunting may be issued. On the other hand, the authorities were now under increased pressure due to a part of the public urging them to lower the wolf protection and another part – to maintain it.

The study "[Developing methodology for setting Favourable Reference Values \(FRV\) for large carnivores in Europe](#)" elaborated by LCIE for the European Commission and published in January 2025, was mentioned. In the EU, consolidated data on large carnivore populations are required in 2025. Implications of a population enjoying a good status remain to be clarified (e.g. is ensuring connectivity an obligation? If not – risk of isolated populations, constituting a threat; is stopping a spontaneous colonisation by the wolf allowed?) However, those provisions are not included in the Convention.

Decision: The Bureau took note of the coming into force of the decision on downlisting of the wolf and the legislative procedures in motion. As the Standing Committee reminded the Contracting Parties last

December, despite the change in the wolf's protection status, the rules of the Bern Convention still apply and need to be observed, notably Art 1(1), Art. 2, Art. 7 and Art. 9. The wolf populations need to be maintained at, or brought to, a level which corresponds to ecological and scientific requirements in accordance with Article 2. Their populations need to be kept out of danger and measures to be taken shall include the temporary or local prohibition of exploitation, as appropriate, in order to restore satisfactory population levels. Exceptions are only possible under the specific circumstances mentioned in Art.9 (1).

The Bureau supported the proposal to re-publish the text of the Convention, including the updated annexes, including the list of the strictly protected and protected species in English and French respectively.

The Bureau wished to be informed of the most recent data on the wolf populations and asked the Group of Experts on Large Carnivores to monitor the situation as required by the state-of-the-art standards.

4.6. Large Carnivores

The Secretariat informed the Bureau about the revival of the Group of Experts on Large Carnivores, which has not met since 2012, and the preparations of the meeting of the Group on 10-11 June 2025 in Strasbourg. The elements of the agenda of the meeting include considering the need for reviewing the previously adopted documents and recommendations concerning large carnivores, discussing opportunities and challenges to their conservation and management, monitoring of the populations of large carnivores, sharing updates about the development of the conservation strategy of the Balkan and Carpathian lynx and other relevant developments on regional or national level.

The Bureau stressed the important role of the Group in monitoring the populations of the recently downlisted grey wolf, according to the decision of the Standing Committee of the Bern Convention.

The Bureau provided initial feedback on the preliminary draft document "Best practices for management of protected and strictly protected populations of large carnivores in Europe." prepared by John D. C. Linnell, Norwegian Institute for Nature Research, Norway, and Luigi Boitani, Istituto di Ecologia Applicata, Italy. It was recommended to better align the title with the content, preferably by enlarging its scope so as to also cover other large carnivores. The question of trophy hunting was also raised, as relevant in some countries.

Decision: The Bureau appreciated being informed of the revival of the Group of Experts on Large Carnivores and stressed the role of the Group in monitoring and providing advice based on an accurate understanding of the state of the populations of the recently downlisted wolf and all large carnivores present on the territory of the Parties, including e.g. the critically endangered Persian leopard (*Panthera pardus tulliana*).

4.7. Group of Experts on Amphibians and Reptiles

The Secretariat presented the outcomes of the online meeting of the Group of Experts on Amphibians and Reptiles, which took place on 25 March 2025. The Group proposed to enhance the identification of the Important Herpetofauna Areas (IHAs), to continue exchanging on countering the spread of BSal, an invasive pathogen, constituting one of the reasons for proposing collaboration with the Group of Experts on Invasive Alien Species. The participants also shared hands-on examples of good practice in protecting amphibians and reptiles.

Decision: The Bureau took note of the outcomes of the meeting of the Group of Experts on Amphibians and Reptiles and was looking forward to reading the report of the meeting, when ready.

4.8. Group of Experts on Invasive Alien Species

The Secretariat presented the outcomes of the online meeting of the Group of Experts on Invasive Alien Species (IAS) on 20 March 2025, in particular the course of action adopted by the Group to

revitalise its work and identify priority topics it would focus on in the future. Among those raised by the attending experts, these topics included the potential need to update the existing documents on IAS, biocontrol agents as a potential source of IAS, IASs in marine and fresh-water habitats, the use of IASs in restoration projects, collecting country reports on IAS, the trade of exotic species and their conversion into IAS, animal rights' versus controlling IAS, and the problem of biomass waste material as a way of spreading IAS of plants.

The Group of Experts expressed the need for also involving experts from non-EU countries and holding its meetings (online or in person) on a bi-annual basis to maintain the momentum of the Group's work.

The Group of Experts was open to organising an online meeting with the Group of Experts on Amphibians and Reptiles later in the year.

Decision: The Bureau took note of the outcomes of the meeting of the Group of Experts on Invasive Alien Species and welcomed its revival, in particular in view of crucial and very dynamic developments in relation to this topic.

5. MONITORING OF THE IMPLEMENTATION OF THE LEGAL ASPECTS OF THE CONVENTION (Biennial reporting and Online reporting system)

5.1. Online Reporting System

The Bureau was informed that the next report for the period 2023-2024 will be launched in 2025 and will use the new ORS developed by the UNEP World Conservation Monitoring Centre (WCMC). It is intended that the questionnaire will be ready for the summer of 2025. In order to prepare the new questionnaire, the Secretariat has launched a survey among non-EU Contracting Parties to receive user feedback, with a deadline set at 15 April 2025.

The Secretariat presented the technical and financial implications of the new ORS, providing an outline of the improvements and enhancements over the old system. The upcoming activities will include migration of data and the onboarding of users. It was highlighted that the WCMC confirmed that the 2021-2022 questionnaire will be used as a basis to prepare the 2023-2024 questionnaire in new ORS.

It was recalled that a number of Parties had not submitted all their reports, despite the start of a new cycle. The submission of all reports is an obligation of contracting parties, and thereby they are still required to complete the reports due from previous cycles. This raises the technical issue of keeping previous questionnaires open, and maintaining the previous ORS platform, which will incur additional costs. The Secretariat presented the submission of reports as an obligation, but also an opportunity – the data from the reports is made available to the public but does not currently undergo further analysis. With a fuller dataset, a greater opportunity would be available to gain insight from the data derived from Biennial Reporting.

The Secretariat proposed to inform non-EU Contracting Parties of the situation and to set a deadline for the submission of outstanding reports using the former ORS. The Secretariat also proposed to explore how contracting Parties could be assisted in completing these submissions successfully. For options after an imposed deadline, the Secretariat will also confer with WCMC on the options for the submission of questionnaires by alternative format and for the data to be integrated in new ORS to enable the closure of old ORS.

Decision: The Bureau took note of the information provided. It requested further clarification and detail on how historical reporting data and reports could be imported into the new system.

To address the issue of the lack of reports from some contracting Parties in the previous cycles, the Bureau asked the Secretariat to encourage the relevant Parties to provide it with these reports and to offer its assistance to do so. It was also suggested that, to facilitate the completion of the questionnaire, it should be confirmed whether or not it would be technically possible to duplicate the answers provided

in the previous report and populate the new form with them, instead of requesting respondents to complete the questionnaire from scratch.

The Bureau also invited the Secretariat to consider options to improve the use and analysis of data contained in the reports, which would also encourage Parties to provide relevant data and fulfil their reporting obligations.

6. IMPLEMENTATION OF THE CONVENTION: CASE-FILES

6.1. Methodology proposed by the UK for monitoring the implementation of recommendations arising from individual case-files

Ms Leah Farquharson, member of the Working Group on overseeing the implementation of the Strategic Plan, presented the methodology proposed by the UK for assessing progress in the implementation of case-file Recommendations, in implementation of indicator 1.5a of the Strategic Plan.

She explained that in the proposed system case files were compiled into a centralised database, including information on the background to the complaint, with a traffic light colour-coding system enabling the visualisation of the progress made on the implementation of the recommendations adopted by the Standing Committee. She also suggested creating a template to be completed by the parties in a case-file.

During the discussions, participants stressed the need to improve the effectiveness of the mechanism for monitoring the implementation of recommendations arising from individual case-files, but without increasing the workload of the Secretariat. The already existing [case-file dashboard](#), which contains already some of the information presented by Ms Farquharson except, in particular, links to the decisions taken by the Bureau and, when relevant, the Standing Committee, was also mentioned, as well as the preparatory work made by the Secretariat ahead of the meetings to assist the Bureau in assessing the case-files, which Ms Farquharson was not aware of.

Ms Farquharson offered to support the process by assisting the Secretariat in the implementation of this database. The Secretariat suggested holding an online follow-up meeting with Ms Farquharson to discuss in more detail the suggested methodology of monitoring and implementing recommendations arising from case-files.

Decision: The Bureau thanked Ms Farquharson for the presentation and the work done. It welcomed the proposal of an online follow-up meeting between Ms Farquharson and the Secretariat to discuss the methodology in more detail. It decided to come back to this issue at a later stage.

6.2. Open files

- 1986/08: Greece: Recommendation No. 9 (1987) on the protection of *Caretta caretta* in Laganas Bay, Zakynthos

Decision: The Bureau thanked both parties for their reports, and welcomed the improvements reported by the authorities.

The Bureau took note that there has been a noticeable decrease in the number of sea turtle strandings encountered in 2024. The Bureau also welcomed that the local Management Unit made complaint to the Port Authority of Zakynthos and filed the case of violation of speed limit at Laganas Bay and associated collisions with turtles with the local prosecutor's office.

The Bureau welcomed that the local Management Unit gave its assent to the Environmental Impact Assessment on the restoration of the Zakynthos landfill at Skopos, and that the restoration of the landfill was expected to start soon.

The Bureau took note with concern of the persistence of most of the key breaches brought forward in the complainant's report, as in previous years.

The Bureau was alerted of additional information from the complainant regarding recent developments in the Marathonisi Island which might constitute a non-compliance with the provisions of the Berne Convention. Bulldozers and land movements have been spotted in the vicinity of a small chapel in the island.

The Bureau regretted that NECCA (National Environment and Climate Change Agency) was informed about the construction activities in Marathonisi Island in November 2024 but that the Government did not report it to the Standing Committee in December.

The Bureau welcomed that NECCA sent a request for suspension of the activity and works already started to the company and to the Building Authority of Zakynthos but expressed its concern about the fact that NECCA has not received any answer from the Building Authority in Zakynthos so far.

The Bureau welcomed that both parties agree to meet in Athens as a preparation for an on-the-spot appraisal (OSA) visit to the site to be held in 2025 back-to-back with the one in Thines Kiparissias.

The Bureau welcomed the participation of the Commission in this preparatory meeting and welcomed the advances in the preparation of the OSA in Laganas Bay.

The Bureau considered that the OSA would be an asset for the proper evaluation of the conservation of the Laganas bay, the protected area and the sea turtle nesting beaches, and suggested to include in the corresponding report an analysis of potential structural constrains, such as the legislative framework, which might seriously compromise decisive advances in the resolution of such a long lasting case-file.

The Bureau urged the authorities to halt any construction until the results of the OSA.

Both parties were requested to submit their progress report for the Bureau meeting in Autumn 2025, by reporting on each point of Recommendation No. 9 (1987) and giving updates on the court cases.

➤ 1995/06: Cyprus: Akamas peninsula

Decision: The Bureau noted that the report sent by the complainant was the same as the report sent for the 44th Standing Committee and regretted the lack of report from the government. It requested that the parties respect their reporting obligations on case files.

The Bureau was concerned about the fact that Cyprus has not implemented the 13 points of Recommendation 191 (2016) yet, and the lack of advances in the declaration of Akamas Peninsula as a National Park, or an equivalent protection category.

The Bureau took note with concern that the Natura 2000 sites still lack binding mechanisms which legally support the protection of the areas, legally binding management plans and a management body in place, except for the National Forest Park (NFP).

The Bureau requested to be informed of future developments on the referring of the EU Commission of Cyprus to the Court of Justice of the EU for failing to designate SCIs as SACs of the Natura 2000 Network, and for failing to establish conservation objectives and measures for these sites.

The Bureau welcomed the information on the enforcement measures at the nesting beaches which were adequately patrolled and controlled by agents of authority and hoped that they would increase in number to cover adequately the whole of the beaches in time and space.

The Bureau regretted that the Sustainable Development Plan for the Akamas peninsula included activities and developments, like upgrades of the road network, which are already having a significant effect on the area, and that the largest part of the project for the improvement of the main forest roads within the Akamas NFP has been implemented without being assessed by the procedure of the Appropriate Assessment Report (AA).

The Bureau was concerned that some of the protection measures which were in place in the beaches have been removed, leaving the nesting sites more exposed during summertime.

The Bureau expressed its concern about the fact that there was growing pressure to expand the quarry adjacent to the Natura 2000 area in Androlikou gorges and the possibility that the construction and

operation of two golf courses and associated development in Limni remained open, as planning permits were approved and can be activated at any time.

The Bureau was concerned about the fact that, although there was a Memorandum of Understanding (MoU) between the parties, there has been no progress in the implementation of this participatory initiative. The Bureau urged the parties to provide updates on the development of the MoU, in order to advance positively in the resolution of the case file.

The Bureau requested that the Secretariat liaise with the Cypriot authorities to eventually co-prepare a multistakeholder meeting with the complainants - among others - to facilitate dialogue between the parties and promote decisive advances in the resolution of this case file.

The Bureau requested both parties to submit their progress reports for the Bureau meeting in Autumn 2025, reporting on each point of Recommendation 191 (2016).

➤ 2010/05: Greece: Threats to marine turtles in Thines Kiparissias

Decision: The Bureau thanked both parties for their reports and regretted the lack of updated information from the government.

The Bureau welcomed the steady increase in the number of nests stated in the reports from the parties and congratulated both the NGOs working in the field during the nesting season and NECCA for this successful result.

The Bureau took note with concern that the same threats for the area have been recorded invariably for fourteen years now, showing unwillingness to fully implement Recommendation No. 174 (2014). The Bureau urged again the Greek Government to adhere to a full and meaningful implementation of Recommendation No. 174 (2014), along with enforcing the Presidential Decree regulations.

The Bureau was concerned about the fact that the Management Plan continue to be delayed for more than six years and urged the Greek authorities to finish and enforce it.

The Bureau was also concerned about the exploratory works for the potential extraction of hydrocarbons, and asked the Greek authorities to halt them as it would constitute another significant threat to Thines Kiparissias turtle nesting beaches.

The Bureau was informed by the complainant about the completion and findings of the assessment on potential implications of constructions and roads in the protected area ("Study of Adequate Assessment of the Impact from Roads and Constructions in the NATURA GR 2550005 Area 'Thines Kyparissias – Neochori - Kyparissia') commissioned by the managerial body OFYPEKA/NECCA following a meeting with the European Commission in April 2024. The Bureau regretted that a translated version of such a relevant document into one of the official languages of the Bern Convention was not provided by the Government. The Bureau took note that the above-mentioned report concluded that the impact of developments in the core nesting area was insignificant or "neutral", and that there has been no degradation of the dunes' habitats, only a local loss that can be easily restored. The report also uses the observed increase in nests over recent years for confirming that the impact of constructions and roads on the habitat and the *Caretta caretta* nesting sites is negligible. The Bureau requested the authorities to demonstrate such a statement.

The Bureau welcomed that both parties agreed to an on-the-spot appraisal to be held in 2025 back-to-back with the one in Laganas Bay, took note that the on-the-spot appraisal visit authorisation from the Greek government was received on 14 January 2025 and welcomed the advances in the preparation of the OSA in Thines Kiparissias.

The Bureau urged the authorities to halt any building under construction or new building until the results of the OSA.

Both parties were requested to submit their progress report for the Bureau meeting in Autumn 2025, by reporting on each point of the Recommendation No. 174 (2014).

➤ 2012/09: Türkiye: Presumed degradation of nesting beaches in Fethiye and Patara SPAs

Decision: The Bureau thanked both parties for their reports but remarked that the government's report had arrived very late after the deadline. In addition, it noted that the government's report is almost entirely a copy of the report sent in August 2024 (the only addition is a reference to a cooperation protocol on Patara between IUCN and the authorities). The Bureau, therefore, requested that the government respect the deadlines issued by the Secretariat in the future, in order to allow for processing and to provide adequate time for the Bureau to assess the reports.

It took note that the complainant didn't observe any changes since its on-site visit as described in its July 2024 report.

The Bureau, therefore, reiterated the main conclusions of the Standing Committee of December 2024 and invited the Turkish Government to pursue their efforts to implement Recommendations [No. 182 \(2015\)](#) and [No. 183 \(2015\)](#).

In particular, while recognising that some improvements have been made, it noted that these are primarily limited to the Patara Main Beach, while other areas are neglected and conservation issues affecting the nesting beaches remained.

The Bureau also regretted the persistence of a large number of key concerns brought forward by the complainant in its report of July 2024, including: construction in protected areas, failure to remove illegal facilities, poor management of beach furniture, light pollution, marine violations, camping in restricted areas, horse riding and vehicle activity on the beach, beach litter, inadequate enforcement of fines, and inadequate implementation of conservation measures.

The Bureau welcomed the cooperation protocol on Patara signed in November 2024 by IUCN and the authorities and asked the latter to include the complainant in the work ahead. It nevertheless urged the Turkish Government to finalise the Management Plan for Patara, to report on the findings of the sea turtle monitoring and conservation and management plan studies, to maintain adherence to the Recommendations and continue their implementation without delay.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025, detailing progress to each point of Recommendations [No. 182 \(2015\)](#) and [No. 183 \(2015\)](#), as well as any other relevant updates.

➤ 2013/01: North Macedonia: Hydro power development within the territory of the Mavrovo National Park

Decision: The Bureau thanked both parties for their reports.

It noted that the study for the valorisation of the Mavrovo National Park (NP) has been prepared in order to legally determine the proposed borders and proposed zones and their boundaries, but regretted that it was not appended or described in the report. The Bureau therefore requested that this study be attached to the next report with a description on the follow-up given to it.

It regretted that there were no other changes in the activity status for the file, as acknowledged by the authorities. It also regretted that no follow-up was given to the call made by the Standing Committee in December 2024 to hold a coordination meeting with the government of North Macedonia to discuss the implementation of the recommendation. The Bureau reiterated the need for such a coordination meeting and offered its help in this regard.

The Bureau, therefore, reiterated the request made by the Standing Committee in December 2024 that urgent progress is needed regarding certain areas of [Recommendation No. 211 \(2021\)](#).

In particular, it regretted that there was still no ban on hydropower in the draft Water Law, contrary to what is required by international standards. It was also concerned that there were no updates concerning the proclamation of Mavrovo NP. The zoning has still not been finalised, and no work has started on the Management Plan. Furthermore, regarding the Lynx Action Plan, no progress has been made, and no state funding is available.

The Bureau also called on national authorities to further reinforce cooperation between State authorities, civil society organisations, and stakeholder groups.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025, detailing progress to each point of [Recommendation No. 211 \(2021\)](#), together with any other relevant updates.

- 2016/05: Albania: Presumed negative impact of developments on the Vjosa river including hydro-power plant development and Vlora International Airport

Decision: The Bureau thanked both parties for their reports.

The Bureau acknowledged the continued concerns posed by the constructions of the Vlora international airport, and the continued efforts of the government to address and mitigate the negative effects.

It requested the completion of the Integrated Management Plan (IMP) and the submission of the dossier for Recognition of the Vjosa Valley as a UNESCO Biosphere Reserve under the Man and Biosphere Programme.

It was saddened to learn from the complainant's report that ornithologists were once again stopped from accessing the premises to conduct the Waterflow Census in mid-January 2025, and media was also restricted from entering the site on different occasions.

The Bureau reiterated the importance for the government and the local authorities to include stakeholders in all processes, as inclusive dialogue and cooperation are crucial for effective environmental management and protection.

The Bureau called for the pausing of the Himara water supply project due to strong opposition and calls for the municipality to engage with all stakeholders, including local communities, NGOs, and international bodies, to find the best resolution to the issue. It stressed that Shushica River is one of the rare wild-rivers habitats, and must be protected. The concerns raised about the potential adverse impacts on the biodiversity of Shushica River and its floodplains are significant. The Bureau encouraged consideration of the IUCN recommendations to ensure conservation values are maintained. It encouraged cooperation between the parties in the redesigning of the water diversion project.

Furthermore, the Bureau took note of the enactment of the new law on Protected Areas despite recommendations to reconsider it, as the law is in conflict with the principles and obligations enshrined in the Bern Convention.

The Bureau requested further information on the impact of the Vlora International Airport on surrounding habitats and species and urged that civil society and NGO representatives are allowed on the premises in order to conduct wildlife monitoring and census.

As per the decision of the Bureau at the Autumn Bureau meeting on 10-12 September 2024, it asked that the government forwards the Bureau's decision regarding this case-file to the Himara Municipality and requested further information on the status of the Shushica River Diversion Project. The Bureau encouraged the Municipality to conduct hydrological studies to accompany the redesign of the project.

It encouraged the authorities to actively engage with civil society and other relevant stakeholders to advance the implementation of [Recommendation No. 219 \(2023\)](#).

Both parties were requested to submit their progress report for the Bureau meeting in Autumn 2025, by reporting on each point of [Recommendation No. 219 \(2023\)](#) and giving updates on the court cases.

- 2017/02: North Macedonia: Negative impacts to Lake Ohrid and Galichica National Park candidate Emerald Sites due to infrastructures developments

Decision: The Bureau thanked both parties for their reports.

It took note of the complainant's argument that nothing was done towards the implementation of the 15 points of [Recommendation No. 221 \(2023\)](#), since its last report (July 2024).

The Bureau regretted that the authorities didn't send a report but only forwarded information provided by the Municipality of Ohrid, without even commenting on it.

The Bureau noted that the remarks contained in the report prepared by the Municipality of Ohrid were mainly directed towards the national authorities. It stressed, in particular, the issue of the moratorium on all construction, except for essential needs such as wastewater infrastructure and emergency services, until recommendations 3, 4a and 12 are adequately completed. The Bureau noted the complainant's remark that the Ministry of Environment continued to contribute forwards further urbanisation of the site by issuing new Decrees for spatial planning conditions, which are, according to the complainant, first steps towards new urbanisation. The Bureau requested the Ministry of Environment to justify these Decrees for spatial planning conditions, when a moratorium on all construction is requested by [Recommendation No. 221 \(2023\)](#).

Additionally, according to the complainant, legalisation of illegal constructions continued and new illegal constructions were built (in particular in the Studenchishte Marsh). Moreover, according to the Strategic Recovery Plan, the Municipality of Ohrid should have removed all illegal constructions within the 50m of shore, in the Studenchishte Marsh and in the St. Naum springs area, by 1 February 2024, which they haven't. The Bureau noted that the Municipality of Ohrid referred to the constitutionally guaranteed right to property, as well as the right to construction. The Municipality acknowledged that the right to property can be limited due to public interest determined by law but that since such a law didn't exist, a moratorium on construction on private space where construction was permitted according to a valid urban plan was not possible. The Bureau agreed that national authorities should act rapidly to put an end to this situation.

The Bureau reiterated the decision taken by the 44th Standing Committee (December 2024) that stressed the importance for national authorities to urgently implement each point of [Recommendation No. 221 \(2023\)](#), which all fall under its responsibility, so that the situation improves in the ground, at local level. Cooperation between the central government and municipal governments is also expected to be reinforced.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025, detailing progress to each point of [Recommendation No. 221 \(2023\)](#), as well as any other relevant updates.

- 2019/05: Türkiye: Habitat destruction in Mersin Anamur Beach

Decision: The Bureau thanked both parties for their reports but remarked that the government's report had arrived very late after the deadline. It therefore requested that the government respect the deadlines issued by the Secretariat in the future, in order to allow for the timely processing and assessment of the reports by the Bureau.

The Bureau appreciated the follow-up given by the regional and local authorities to the decisions of the Standing Committee concerning Mersin Anamur Beach, mainly appointing new staff to enhance the enforcement of the legislation and to collect data in line with the Bern Convention Guidance tool on conservation of sea turtle nesting sites, adopted by the Standing Committee.

However, the Bureau was concerned that most issues included in the previous NGO reports have not been corrected, including light pollution, illegal vehicle entry to the beach, expanding businesses, stone walls alongside the *Trionyx triunguis* habitats (Dragon river and Sultan Stream), etc.

The Bureau regretted that, as reported by the complainant, the degradation of the nesting beach continued during the winter months, when the control and inspection mechanisms did not operate and owners of businesses and fields on the edge of the nesting beach expanded the violations. That will

lead to an increased human pressure on the nesting beach during the summer months, e.g. in Karaağaç, where soil dumping on the beach, bungalow construction and tree planting were pursued.

Informed by the complainants about the degraded situation, the Bureau urged the authorities to take a more proactive approach in implementing [Recommendation No. 226 \(2024\)](#), and to maintain controlling the area concerned, namely the beach and the *Trionyx triunguis* habitats, throughout the year.

Furthermore, the Bureau requested further information on the activities evoked in the update report of the government, scheduled for the end of February 2025, hoping that the commission established under the Governorship of Anamur agreed on concrete measures allowing to implement [Recommendation No. 226 \(2024\)](#), with the support of a monitoring group.

The Bureau asked both parties for their update reports on the implementation of [Recommendation No. 226 \(2024\)](#) and other relevant developments for the Bureau meeting in Autumn 2025.

- 2020/09: Bosnia and Herzegovina: Possible negative impact of hydro-power plant development on the Neretva River

Decision: The Bureau thanked both parties for their reports.

The same concerns remain as communicated by the 44th Standing Committee 2024.

The Bureau appreciated the readiness of the authorities of Bosnia and Herzegovina and the complainant to move forward with a joint meeting to discuss the implementation of the [Recommendation No. 217 \(2022\)](#). The Bureau expressed its interest in being involved in this meeting and requested to be informed of the arrangements for it, once it has been scheduled. It recommended an online preparatory coordination meeting with the relevant parties and Ministries to agree upon the schedule, location and agenda, with the aim of holding the meeting before the end of 2025. The Bureau also recommended the definition of all relevant parties to include the participation of national, regional and local government, academia and civil society.

The Bureau reflected with concern on the communication by the respondent on the construction of a radioactive material storage facility in Croatia close to the Bosnia and Herzegovina border. The Bureau would welcome clarification on how this would impact this case-file.

Both parties were requested to submit their update reports for the Bureau meeting in Autumn 2025, detailing progress on each point of [Recommendation No. 217 \(2022\)](#), as well as informing on any other relevant developments.

- 2022/03: Norway: Wolf culling policy

Decision: The Bureau thanked both parties for their reports.

The Bureau appreciated that management of wolves, as well as other large carnivores, was a challenging task which required balancing sustainable conservation, the social tensions, cultural and economic interests.

Recognising that the Bern Convention Standing Committee was not a court, the Bureau expressed its concern that the Ministry of Climate and Environment questioned the role and mandate of the Standing Committee, and its long-standing practice based on peer-reviewing the implementation of the provisions of the Convention, meant to guide the Parties in aligning their actions with the Convention.

The Bureau reiterated the decision of the Standing Committee in December 2024, in which it reminded the Contracting Parties that despite the change in the wolf's protection status, the rules of the Bern Convention still apply and need to be observed, notably Art 1(1), Art. 2, Art. 7 and Art. 9. The wolf populations need to be maintained at, or brought to, a level which corresponds to ecological and scientific requirements in accordance with Article 2. Their populations need to be kept out of danger and measures to be taken shall include the temporary or local prohibition of exploitation, as appropriate, in order to restore satisfactory population levels. Exceptions are only possible under the specific circumstances mentioned in Art.9 (1).

The Bureau stressed that the information brought to its attention by the complainants indicated continued lack of due concern to the provisions of the Convention and the survival of the species, which seem to enjoy little protection either outside or within the wolf management zone. In particular, the Bureau regretted proportionally very high quotas for culling wolves, which may lead to falling under the extremely limited target of 4-6 litters annually, as well as insufficient consideration to the genetic impoverishment of the wolf population in Norway.

The Bureau stressed the important role of the Group of Experts on Large Carnivores in monitoring the status of the wolf populations in Europe and invited the Group to analyse the matter.

The Bureau reiterated that a wide scope of good practice was available concerning enhancing the coexistence with wolves, allowing to maintain grazing and interests of rural policy without keeping the species population on the brink of extinction.

The Bureau wished to avail itself for dialogue with the Norwegian authorities and appreciated their openness to collaborate towards identifying optimal solutions.

The Bureau requested both parties to submit their update reports for its meeting in Autumn 2025.

➤ 2023/03: Switzerland: New wolf culling policy

Decision: The Bureau thanked the complainant for their report and regretted the lack of report from the government. It requested that the government respect its reporting obligations on case files.

The Bureau acknowledged the modifications to the revised Hunting Ordinance as of February 2025, with the adjustments concerning the ban on night hunting or shooting the adult wolves in front of their young, as well as the repeated attacks on livestock as a precondition to reactive culling.

The Bureau reminded the authorities that some of the temporary provisions of the new Hunting Ordinance, in particular night hunting and use of sighting devices for night shooting, were prohibited by the Convention and shall be included in the biennial reporting on exceptions to the provisions of the Convention.

The Bureau reiterated the decision of the Standing Committee in December 2024, in which it reminded the Contracting Parties that despite the change in the wolf's protection status, the rules of the Bern Convention still apply and need to be observed, notably Art 1(1), Art. 2, Art. 7 and Art. 9. The wolf populations need to be maintained at, or brought to, a level which corresponds to ecological and scientific requirements in accordance with Article 2. Their populations need to be kept out of danger and measures to be taken shall include the temporary or local prohibition of exploitation, as appropriate, in order to restore satisfactory population levels. Exceptions are only possible under the specific circumstances mentioned in Art.9 (1).

The Bureau expressed concern with the removal within the maintenance and development zone of the UNESCO Biosphere Reserve of the entire pack whose territory included the Swiss National Park, against the NP legal provisions and rendering a 20-year research project there unviable. The Bureau regretted that another research project, on co-existence, was stopped by culling of the entire wolf pack concerned.

Furthermore, the Bureau was concerned with a significant cut in the funds for proven livestock protection measures and invited the federal authorities to facilitate the transfer of responsibility for those measures from the federal to the cantonal level, to ensure sufficient means to promote co-existence with wolves and the use of non-lethal methods.

The Bureau requested both parties to submit their update reports for its meeting in Autumn 2025.

6.3 Possible files

➤ 2001/04: Bulgaria: Motorway through the Kresna Gorge

Decision: The Bureau thanked both parties for their joint report and welcomed their efforts to continue working together to find an issue to the case file.

It also welcomed the positive developments described, in particular the agreement reached on a roadmap for the implementation of the project that reflects the 44th Standing Committee decision, and its approval on 12 February 2025 by Decision No. 62 of the Council of Ministers of Bulgaria.

The Bureau noted that initial steps have already been taken towards its implementation. For example, on 9 January 2025 the Road Infrastructure Agency cancelled the tender from 2024 for the identification of a complementary road parallel to the Struma Motorway, stating that it will reformulate the terms of reference of a new tender in accordance with the decision of the 44th Standing Committee. The Bureau recalled that the focus should be on how the second lane of the Motorway (from Sofia to Kulata) can be constructed (phased) next to the Eastern lane (Kulata-Sofia) with effective mitigation measures to avoid adverse impact on the integrity of the sites and leave the existing E79 and the bypass of Kresna town as a complementary road. It notes in this regard that the parties agreed on some changes in the mitigation measures. These include increasing the size of the facilities that serve both for water drainage and to ensure the passage of animals from 2 x 2 m to 3 x 3 m by providing them at a higher embankment height so that they are of a shorter length (and should provide sufficient lighting and create passage conditions for most reptile species), and constructing the fencing facilities at half the height of the embankment, which will allow the reptile habitat to be restored at the bottom.

The Bureau also took note that the roadmap foresees the establishment of a permanent expert group to follow up its implementation, with the participation of the competent institutions (Ministry of Regional Development and Public Works, Road Infrastructure Agency, Ministry of Environment and Water, Ministry of Transport and Communications, State Agency Road Safety) and stakeholders (Save the Kresna Gorge Coalition of NGOs), and that its Chairperson will have to report on a quarterly basis the progress on the implementation of the roadmap to the Council of Ministers. The Bureau requested that these reports be appended to the future reports of the parties.

The Bureau requested that the next report explains whether the proposals made on 10 February 2025 by the NGO and the expert herpetologists, which included the revision and the adaptation of the envisaged mitigation measures for the existing E79 road in the Kresna Gorge, were indeed endorsed by the government institutions. The Bureau requested that the report summarises the adopted mitigation measures.

The Bureau noted that the issue of the applicable and legal procedures for the future environmental impact assessment (EIA) and appropriate assessment (AA) remained a matter of future agreement. It requested that this matter be solved rapidly.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025, detailing progress in the implementation of the roadmap as well as any other relevant updates.

➤ 2020/04: Armenia: The Amulsar gold mine project and its impacts on Emerald Network sites

Decision: The Bureau thanked both parties for their reports.

Regarding the Amulsar gold mine:

The Bureau reiterated its request for a new Environmental Impact Assessment (EIA) which considers all the species and habitats present in the area. It further asked the authorities to suspend any permits for the exploitation of subsoil until the new EIA has been completed.

It requested the authorities to report on the state of play of the study carried out by the Scientific Centre of Zoology and Hydroecology aimed to assess the recent biodiversity findings in the area of Amulsar.

Regarding the revision process of the Emerald Network in Armenia:

The Bureau welcomed the involvement of civil society, including the complainant, in the consultation process regarding the revision of the Emerald Network. It invited the authorities to pursue the dialogue and ensure relevant comments and suggestions are taken into account.

The Bureau inquired why the designation of the Jermuk National Park was related to the suspension of the work at Amulsar and requested the authorities to take advantage of the ongoing "Biodiversity and Sustainable Local Development in Armenia" project funded by the KFW Development Bank to

pursue the discussions without delay. Furthermore, the Bureau requested a clarification on the official position of the Government and other stakeholders regarding the designation of Jermuk National Park.

The Bureau requested both parties to report on progress for its meeting in Autumn 2025.

- 2022/06: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region

Decision: The Bureau thanked both parties for their reports.

Regarding Bosilegrad:

The Bureau took note of the temporary suspension of mining and geological works by Bosil-Metal d.o.o, and also of the issuing on 9 January 2025 of the water conditions for the company for preparing technical documentation on the expansion of boundaries of the Bosil-Metal mine site in ore deposits Podvirovi and Popovica-Conjev Kamen in the Karamanica area near Bosilegrad, for extracting CU, Pb, ZN ores, including the processing plant and tailings dam.

The Bureau acknowledged that a Draft Agreement was proposed to establish cooperation between the governments of Serbia and Bulgaria in water management, and took note of the Bulgarian-Serbian meeting of experts in the field of strategic check and EIA within the ESPOO Convention, taking place on 2 December 2025. Furthermore, the Bureau requested information on the decision of the Ministry of Environmental Protection on the EIA Study corrected by Bosil-Metal following the observations of the Technical Commission and interested public in Bulgaria and Serbia.

The Bureau was also informed of the decision of the Institute for Nature Conservation on nature protection conditions, of 30 January 2025, and its implications for the planned activities in the Podvirovi and Popovica area, in terms of disallowing the activities within the scope of its work planned in the area within the ecologically significant area of the Ecological Network Golemi Vrh (95) and internationally important bird area Dukat. In that context, the Bureau asked to be informed whether the INC decision has become binding, or – if that was not the case – of the status of the ongoing legal proceedings.

The Bureau was concerned by inconsistencies in the results of the water quality testing by the Municipality of Bosilegrad, which concluded that the emission limit values for pollutants in surface and ground waters and sediments were respected since 2021, in comparison with the expert mandated by the complainant, who reported significant irregularities downstream from the currently inactive mine, supposedly due to the toxic tailings and waste deposits remaining at the mine in breach of Article 4(1) of the Convention.

The Bureau took note of the complaint for economic offence filed against Bosil-Metal d.o.o. on 12 November 2024 for failing to comply with the conditions and measures under the decision to approve the EIA Study for the reconstruction of the Podvirovi-Karamanica mine and additional exploitation of the deposits, and requested to be informed of the results.

Regarding Homolje:

The Bureau noted with concern that DPM resumed drilling on their Potaj Cuka licence, causing a threat of pollution to the surface water and karst water bodies, and other potential negative impacts due to dewatering, noise and air pollution on the National Park Kučaj – Beljanica, a proposed Emerald site.

The Bureau acknowledged that the complainants denounced a lack of monitoring and control by the authorities and a lack of meaningful communication with stakeholders on the progress of legal procedures following infringements reported to the police.

The Bureau requested a more substantial report on the situation in the Homolje Mt region from the side of the relevant authorities.

The Bureau requested both parties to report on further developments for its meeting in Autumn 2025.

6.4 Complaints on stand-by

- 2016/09: Georgia: Possible threat to “Svaneti 1” Candidate Emerald Site (GE0000012) from Nenskra Hydro Power Plant development

Decision: The Bureau thanked both parties for their reports.

The Bureau is concerned in regard to the challenges faced by the complainant in terms of their operation as a civil society organisation (CSO) in Georgia. The Bureau nevertheless encouraged the authorities to remain responsive to the concerns of the complainant to ensure they are understood and considered, with the shared goals of meeting their obligations under the Bern Convention with the best possible environmental and ecological outcomes for the future of Georgia.

The Bureau observed that the future of the Svaneti project remained open, as do the possible impacts. The Bureau also noted that funding for the project remained an ongoing question. The Bureau would therefore welcome further details from the authorities on the financial situation of the project.

The Bureau observed that the protection of rivers still remains an open issue, as despite progress in the designation of areas for preservation, these protections have yet to be meaningfully extended to the rivers of Georgia. The Bureau encouraged the authorities to intensify efforts in the protection of freshwater species. Furthermore, the Bureau considered that in the planning and impact of such a project, the authorities should thereby be informed and be able to elaborate on what scope there is for what can be protected.

The Bureau requested both parties to submit their progress reports for its in Spring 2026.

The Bureau indicated that due to the concerns of the complainant, the complaint remains on **stand-by**.

- 2018/01: Ukraine: Presumed threat to Emerald site “Polonina Borzhava” (UA0000263) from wind energy development

Decision: The Bureau thanked the authorities for their report and regretted the absence of report from the complainant.

The Bureau welcomed the decision of the Supreme Court of Ukraine to cancel the construction permits of windfarms. It also took note that, as reported by the authorities, they would explore alternative locations for the construction which would not affect the Emerald Network.

The Bureau agreed that the Emerald Network site “Polonina Borzhava” was not threatened by wind energy infrastructures anymore and **decided to close the complaint**.

The Bureau invited the complainant to follow the development of the situation and to report back in case of new threats to the Emerald Network site.

- 2018/05: Ukraine: Alleged threats to the Emerald Network sites Skhidnyi Svydovets, Marmaroski ta Chyvchyno-Hryniavski Hory and Carpathian Biosphere Reserve

Decision: The Bureau thanked the authorities for the updated report and regretted the absence of report from the complainant.

The Bureau welcomed the decision of the Supreme Court of Ukraine to declare the detailed territorial plan for the Svydovets complex as unlawful and its instruction for the project to be abandoned.

The Bureau considered that the Emerald Network sites Skhidnyi Svydovets, Marmaroski ta Chyvchyno-Hryniavski Hory and Carpathian Biosphere Reserve were not threatened by the creation of a ski resort anymore and **decided to close the complaint**.

The Bureau invited the complainant to follow the development of the situation and to report back in case of new threats to the Emerald Network sites.

➤ 2019/04: United Kingdom: Badger Culling Policy in England

Decision:

The Bureau thanked both parties for their reports and took note of the concerns of the complainant and the explanation and detail by the government.

The Bureau welcomed the development of a new bTB strategy and the consideration of the badger within it, noting the redirection of policy away from culling. Given the position that the use of culls is no longer considered an effective measure, but the intensive culling licences and supplementary licences remain in place until January 2026, the Bureau would welcome the government to comment on why the curtailment of licences cannot occur at an earlier point. The Bureau would also welcome some detail on the methodology of killing, as well as other initiatives within the bTB strategy, such as the vaccination of badgers and cattle.

The Bureau noted that the projection included in the government report for the operation of licences indicates that there will be no intensive badger control licences or supplementary licences extant by January 2026. The Bureau would welcome clarification that both licences and supplementary licences end in January 2026, regardless of their date of issue. The Bureau also requested why a moratorium on the culling of badgers does not seem to have been considered as an option, and therefore requested a reply on this question for the Bureau meeting of Summer 2025.

The complainant has communicated their attempts to engage with those responsible for bTB policy in the UK Government, and the government has indicated that the new, comprehensive bTB strategy will involve working closely with farmers, vets, scientists and conservationists. The Bureau requested that the government extend this spirit of engagement to include the complainant in this process to accommodate and address their concerns, so they are able to be informed and participate appropriately in bTB strategy development.

In view of the revision and developments of bTB policy, and the stated concerns of the complainant, both parties were requested to submit their progress reports for the Bureau meeting of Summer 2026.

The complaint remains on **stand-by**.

➤ 2020/06: Portugal: Presumed threat to Tagus Estuary Special Protected Area from a new airport

Decision: The Bureau thanked both parties for their reports.

The Bureau took note that the Independent Technical Commission (ITC) in charge of the Strategic Environmental Assessment (SEA) of the proposal of a new airport for Lisbon area, delivered its final report in March 2024.

It welcomed the decision adopted by the Portuguese government that, according to the outputs of the SEA, Montijo was no longer considered as an option to expand airport capacity in Lisbon, and that this decision was legally binding through Resolution of the Council of Ministers No. 66/2024 of 27 May 2024.

The Bureau took note that an alternative location at Alcochete has been selected and considered this a very positive development.

The Bureau took note of the concerns of the complainant about the fact that the proposal to extend the Environmental Impact Assessment (EIA) of the Montijo proposal has not been rejected so far and that the EIA for the alternative location for the airport has not been carried out so far.

The Bureau requested the Portuguese authorities to report on the decision of the Administrative Court of Lisbon concerning the EIA for the initial proposed site at Montijo, and on the future EIA of the new proposed site for the International Airport at Alcochete, according to the conclusions of the SEA.

The Bureau requested that both parties submit their progress reports for its meeting in Summer 2026.

The complaint **remains on stand-by**.

- 2021/02: Norway: Alleged threat to birds and protected sites due to the proposed construction of windfarms

Decision: The Bureau thanked the authorities for their report and regretted the lack of a report from the complainant.

The Bureau appreciated that the authorities took into consideration the concerns of the complainant regarding the disappearance rate and search efficiency and noted that the corrected number of collision-killed birds and bats would be available later in the year, when the final results of the monitoring programme are known. The results of the monitoring would be of great interest to the Bern Convention Group of Experts on the conservation of wild birds.

The Bureau noted the diverse methods used to monitor the birds of prey, European shag, migratory birds and bats (as of 2022), the initial results of the observations and searches in 2023 season, and the positive results of the inspection by the Norwegian Water Resources and Energy Directorate in 2024, involving various stakeholders.

In view of the efforts of the authorities, the resulting positive developments and lack of the report of the complainant, the Bureau decided to **close** the complaint.

The Bureau invited the complainant to follow the development of the situation and to report back in case of new threats.

- 2021/05: Germany: Habitat loss in Baden-Württemberg threatening the conservation of *Tetrao urogallus*

Decision: The Bureau thanked both parties for their reports.

The Bureau was pleased to know that the overall protection of Capercaillie (*Tetrao urogallus*) in Baden-Württemberg was strengthened with the improved implementation of the Capercaillie Action Plan (APA), and that silvicultural measures were improving the habitat suitability for the species.

The Bureau welcomed the information that there has been a slight increase in the number of males in 2024 (111 males), compared to the previous three years.

The Bureau was concerned by the fact that the authorities did not have precise data on the reproductive success of the Capercaillie in the Black Forest, nor of the level of predation of small carnivores affecting the species.

The Bureau expressed concern that 206 wind turbines were planned in the Black Forest, expanding the current or potential habitat affected by these infrastructures.

The Bureau was worried that, according to the complainant, the biological fitness of the Capercaillie in Baden-Württemberg further deteriorated, as shown by the steady reduction in its distribution area, and to official numbers of reproductive males, which were close to the historical minimum.

The authorities were requested again to share information on the state of play of wind energy infrastructure expansion, data available on the *Tetrao urogallus* population, including nesting and hatching, and the results of the research on predator-related mortality, with special attention to the effects of the recent invasive species, the Raccoon (*Procyon lotor*), an active predator of birds nesting on the ground.

The Bureau requested the authorities to report specifically on the measures adopted for the restoration of habitat related with the Action Plan, the targets addressed, the results obtained so far, and to monitor the effects of the restored habitats on the Capercaillie distribution and breeding behaviour.

The Bureau requested that both parties submit their progress reports for its meeting in Summer 2026.

The complaint **remains on stand-by**.

➤ 2021/06: France: Conservation of the Western hazel grouse (*Tetrastes bonasia rhenana*)

Decision: The Bureau thanked both parties for their detailed reports and commitment to the conservation of the hazel grouse (*Tetrastes bonasia rhenana*).

The Bureau welcomed the renewed commitment of the French government to the conservation of *Tetrastes bonasia* and the implementation of the regional action plan 2024-2030. It highlighted the need to enhance conservation measures, considering the extinction of this species in neighbouring countries.

The Bureau noted that the round table with French, German, Luxembourgish, and Belgian participants, scheduled for 2024, took place on 27 November 2024, fairly late in the year.

The Bureau remained concerned about the lack of consensus regarding whether the Vosgian individuals belong to the subspecies *rhenana*. It acknowledged that the complainants have provided scientific evidence supporting this classification, while the French authorities' study, which challenges it, has yet to be published despite repeated references in the latest reports received concerning this matter.

The Bureau recognised the efforts of mapping, quantifying, and analysing the hazel grouse populations in the Vosges mentioned in the Government's February 2025 report. It requested the French authorities to continue organising specific studies involving experienced ornithologists and conservation biologists to augment existing data and clarify the status of the remaining populations.

In case of confirmed discoveries of hazel grouse in the Vosges mountains, likely as isolated specimens, the Bureau requested the diligent convening of a committee of qualified and international experts. This committee should determine, based on scientific evidence, whether these isolated specimens have mid-term survival prospects in their current habitat or if they need to be captured for an *ex-situ* conservation mission.

The Bureau also requested the French government to include tangible, precise, and understandable data regarding the progress of the PRA Gélinothe. If a comprehensive conservation plan addressing technical, legal, and scientific aspects, as well as the validity of the subspecies, genetic challenges, and population reinforcement, is developed or implemented as proposed in the French government report, the Bureau requested detailed updates of its advancements in the next progress report.

The Bureau reiterated its call for the French authorities to rigorously apply the precautionary principle and to do everything possible to preserve the hazel grouse population in the Vosges.

The Bureau requested both parties to submit their progress reports for its meeting in Summer 2026.

The complaint remains on **stand-by**.

➤ 2022/01: Serbia: Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure constructions

Decision: The Bureau thanked both parties for their reports.

The Bureau noted the list of protected species of amphibians and birds concerned, as reported by the Institute for Nature Conservation, and lack of reference to them in the EIA Study. The Bureau requested information on protected species listed therein, as well as information concerning the embankment.

Furthermore, the Bureau noted the findings of the civil society initiatives, evoked by the complainant and indicating very significant ornithological biodiversity. The Bureau regretted that the Institute did not consider the geolocalised data, provided by the complainant, and encouraged both sides to cooperate in verifying the presence of further protected species in the area.

The Bureau expressed concern that the EIA study, besides seemingly remaining incomplete, was issued after the launching of the construction, without the required transparency and consideration for the actual cumulative impact of the project. While appreciating the general measures to be observed both during the construction and afterwards were stipulated, the Bureau remained unconvinced those measures could be sufficient for preserving the natural value of the area and its resilience, referred to in the report of the authorities. Also, the Bureau regretted that the irregularities already occurred, such as illegal dumping sites in the vicinity of the construction.

The Bureau called on the authorities to ensure transparency and public engagement in the process, in particular in what concerns the plans to construct a new, fifth bridge, as per the contract with the same company. The Bureau requested information on such plans.

The Bureau noted that on 24 January 2025 Novi Sad was granted the status of “Ramsar wetland city” and requested the Secretariat to liaise with the RAMSAR Convention to clarify the status, the rationale and the implications of the designation.

The Bureau requested that both parties submit their progress reports for its meeting in Autumn 2025.

The complaint **remains on stand-by**.

➤ 2022/02: Austria: Alleged violation of the Convention in relation to deliberate killing of *lutra lutra*

Decision: The Bureau thanked both parties for their reports.

It noted from the reports of the parties that nothing had changed since last year and that the content of the new Carinthian regulation of 12 December 2024 remained the same as that of the previous version.

The Bureau recalled that, according to Appendix II of the Bern Convention, *Lutra lutra* is a strictly protected fauna species. All forms of deliberate capture, keeping in captivity, and deliberate killing of *Lutra lutra* are therefore prohibited according to Article 6 of the Bern Convention. A few exceptions are however possible in accordance with Article 9 of the Convention “provided that there is no other satisfactory solution, and that the exception will not be detrimental to the survival of the population concerned”. One of these exceptions is “the protection of flora and fauna”. In addition, Appendix IV of the Bern Convention prohibits, among other things, the using of traps if applied for large scale or non-selective capture or killing.

The Bureau therefore considered firstly whether the deliberate capture and killing of *Lutra lutra* in Carinthia is needed to protect fauna. In this regard, it noted that the authorities argued that this was done to maintain sustainable fish stocks in Carinthia. The authorities referred to a decline in protected fish biomass and made a link with an increase in the otter population. The Bureau noted, however, firstly, that among the fish species mentioned by the authorities (brown trout, Danube salmon, Danube brown trout and Crayfish) the Danube Salmon (*Hucho hucho*) and the Crayfish (*Astacus astacus*) were the only species protected under the Bern Convention (in Appendix III, Protected fauna species), when *Lutra lutra* was protected under Appendix II (Strictly protected fauna species). The Bureau also noted that the report didn’t refer to studies confirming the link between the decline of these species and the otters. It therefore requested information from the authorities on whether investigations have been made into whether other factors beside the otters’ presence could explain the decline in fish biomass, such as water pollution or ineffective fish ladders.

Secondly, the Bureau also noted from the authorities’ report that the hunting of otters was not permitted everywhere, but only in certain areas, such as the upper reaches of rivers, in the entrance and exit areas of fish ladders at run-of-river power plants and at ponds that can’t be fenced in. The report, however, lacked sufficient demonstration that there were no other satisfactory solutions to protect fauna in these areas than the deliberate capture, keeping and deliberate killing of *Lutra lutra*, which is therefore in breach of the requirements of the Convention.

Thirdly, the Bureau noted that the authorities continue to argue that the conservation status of *Lutra lutra* in Carinthia was favourable. According to the [conservation status](#) reported under articles 17 and 12 of the Nature Directives, the conservation status of *Lutra lutra* is favourable for the continental part of Austria. It is however unfavourable in the alpine region of Austria where Carinthia is located. Therefore, the deliberate killing of *Lutra lutra* in Carinthia could be detrimental to the survival of *Lutra lutra*, and should, as a consequence, not be permitted.

Finally, the Bureau first noted that, according to the authorities, the use of conibear traps in Carinthia was considered necessary, among other things, to protect the life and health of people. It requested that the authorities elaborate on this and explain the risks that otters pose to human life and health. Second, even though the relevant regulation limits the use of Conibear traps in Carinthia, the Bureau noted that they can be used between 1 November and the end of February, leading to the killing of *Lutra lutra*, which is in contradiction with the requirements of Appendix IV of the Bern Convention. The Bureau

therefore requested that the authorities ban the use of Conibear traps or of any other non-selective means all year-round.

On the basis of all the elements detailed above, the Bureau considered that the authorities failed to demonstrate that the exceptions to the deliberate killing of *Lutra lutra* were justified and in line with the requirements of the Bern Convention. It therefore reiterated its strong concern about the deliberate killing of *Lutra lutra* in Carinthia and decided to **elevate the status of the complaint to a possible file**.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025, in preparation for its consideration by the 45th Standing Committee in December 2025.

- 2022/04: Montenegro: Hydropower plant development on Emerald Network site Komarnica (ME000000P)

Decision: The Bureau thanked both parties for their reports.

The Bureau took note that the evaluation of the Strategic Environmental Impact Assessment (EIA) was facing delays and that its finalisation was expected in February 2025. It was noted that this assessment was submitted by the anticipated date, yet it regretted that neither the government nor the complainant updated the Bureau on the content or their perspectives of the finalisation and submission of the Assessment.

The Bureau further took note that the final decision on the Komarnica hydropower plant would depend on the conclusions of the evaluation of the EIA. The Bureau requested that NGOs and civil society be included in future elaborations and discussions.

The Bureau recalled that the Komarnica hydropower plant was included in Montenegro's Energy Development Strategy as well as in the draft Spatial Plan for Montenegro, and that the Komarnica hydropower plant was supported by the European Commission's Investment Plan as part of the long-term energy strategy. It nevertheless acknowledged that there were potential challenges reconciling hydropower projects and nature conservation. The Bureau would welcome the government's elaboration on how the Komarnica hydropower plant is considered in these strategy and plans, and how this is reflected in these plans and strategies to not impact the environment.

The Bureau welcomed that scientific research on the Komarnica River continued.

Both parties were requested to submit their progress reports, notably on the results of the EIA, for the Bureau meeting in Autumn 2025.

The complaint remains on **stand-by**.

- 2022/07: Bosnia and Herzegovina: Possible negative impact of mining activities in Trstionica – Gornja Bukovica and Vareš

Decision: The Bureau thanked the complainant for its detailed report. It regretted the lack of a report from the authorities. It requested that the government respect its reporting obligations on case files.

The Bureau noted that, due to the government's failure to report on the progress and implementation of its April 2024 decision, the government was not addressing the concerns it had raised therein. The Bureau therefore regretted that it was unable to provide a fully informed position.

The Bureau was concerned by the apparent lack of implementation of court decisions, the alleged inaction of the competent institutions, and the reported environmental damage. The Bureau urged the Government of Bosnia and Herzegovina to implement the Constitutional Court's decision of 11 July 2024 that declared the Decision of the Government of the Federation of Bosnia and Herzegovina on Change of Purpose of Forest Land and Temporary Use of Forest Land for Other Purposes to be null and void and demanded that all related decisions be annulled. Furthermore, the Bureau asked the Government to keep it informed of the measures that have been taken to implement the Constitutional court's decision.

The Bureau recommended a comprehensive environmental impact assessment to evaluate ongoing damage and recommended taking immediate measures to prevent further environmental degradation.

In this context, the Bureau requested detailed, tangible, and precise diagnostic elements on this point in the government's next report.

Furthermore, the Bureau demanded that the Government of Bosnia and Herzegovina ensure transparency and access to all concession agreements and related documents. Transparency must remain a priority for the situation to be resolved as effectively as possible locally. As such, the Bureau called on public authorities to improve communication and information dissemination to ensure transparent engagement with local communities.

The Bureau condemned the use of SLAPPs to intimidate activists. It recalled Recommendation CM/Rec(2024)2 of the Council of Europe, encouraging member states to combat strategic lawsuits against public participation, known as "SLAPPs". Member states are advised to strengthen their legislative frameworks, protect victims, and promote awareness of these practices through educational programs and training.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025.

The complaint remains on **stand-by**.

- 2023/01: Albania: Alleged habitat destruction due to the construction of the Skavica Hydropower Plant on the Drin River

Decision: The Bureau thanked both parties for their reports.

The Bureau welcomed the clarification of the Skavica HPP project options by the government, with detail offered on the location of the dam and how options were considered and rejected in the process should they impinge upon designated protected areas. The Bureau would welcome some elaboration on how this is reflected in the planning of the project.

The Bureau noted and acknowledged the explanation of the government in regard to the current status and stage of the project and the next steps in regard to the ESIA. The bureau also welcomed the progress reported by the government in the ongoing studies and preparations for the Environmental Impact Assessment.

The Bureau referred to their previous observations regarding the support for the protection of the Balkan lynx by the Albanian authorities, and that this may be undermined by the impacts of this HPP project and the perceived decline in the Balkan Lynx Recovery Programme. The Bureau considered that the issue of the preservation of this species and the viability of the bio corridor - which is important for this species as well as others – ought to be appropriately considered during the Environmental Impact Assessment process. The Bureau noted that despite this previously expressed concern, the respondent did not address this in its report.

The Bureau noted the concerns of the complainant, regarding the review by Polytechnic University of Tirana of the studies carried out by Bechtel and other contractors. The Bureau looked forward to the ongoing studies and Environmental Impact Assessment process addressing the concerns previously observed.

In light of previous rulings by the Constitutional Court, and of the concerns expressed by the complainant, and of the reporting community concerns over the project, the Bureau looked forward to the full-scale public consultations indicated by the government.

The Bureau would also welcome some elaboration on the timeline of the project - once the ESIA is submitted, it would welcome information on the schedule for consultation, and on other milestones that will be required before the decision is made to proceed with the project or not. The Bureau also requested that the international donors and financial institutions involved be included and made aware of the potential environmental risks, and that the government confirm that the contractors engaged in the project and ESIA also be in receipt of the concerns and information related to the complaint. The Bureau therefore requested that the government informs investors and contractors of its decision.

Both parties were requested to submit their progress reports for the Bureau meeting in Spring 2026.

The complaint remains on **stand-by**.

6.5 New complaints

- 2024/01: France: Alleged insufficient protection of the Hermann's tortoise (*Testudo Hermannii*)

Decision: The Bureau thanked both parties for their reports.

The Bureau welcomed the French government's efforts, including the implementation of successive national action plans (NAP 2009-2014 and NAP 2018-2027), the creation of protected sites such as the Plaine des Maures Nature Reserve, and measures to raise awareness and strengthen the population of Hermann's tortoise. However, the Bureau also expressed concern about the persistent pressures on Hermann's tortoise habitats, such as uncontrolled deforestation, agricultural and urban development projects, recurring fires, and recent legislative changes likely to reduce legal protection.

Despite some convictions, these activities have continued, suggesting that sanctions alone may not be sufficiently dissuasive or capable of addressing the problems raised in this case. The Bureau requested information from the Government on the measures put in place to deal with unintentional damage – particularly where intentional harm cannot be proven – and on the compensation measures envisaged for such unintentional damage.

To cover all major and notable sensitive areas for Hermann's tortoises and to ensure complete coverage of their viable breeding habitats, the Bureau recommended the expansion of protection perimeters. Furthermore, the Bureau called for more concrete and effective measures to prevent harm to the tortoise and its habitats, with an emphasis on preventing illegal deforestation and strengthening environmental enforcement.

The Bureau noted that the government's report did not adequately address the issues of captivity, illegal harvesting, and trade of tortoises. It therefore urged the French government to detail in its next report what measures are being taken to address these issues.

The Bureau took note of the new provisions introduced by the recently enacted framework law for food sovereignty and generational renewal in agriculture and observed that the legislative amendments will limit criminal sanctions to intentional acts or serious negligence, and no longer to involuntary acts or simple negligence. In this regard, the Bureau requested information on the compensatory measures planned to address habitat damage and restoration obligations for such involuntary acts or simple negligence.

Regarding the geographical scope, the Bureau noted that the complaint included regions such as Provence-Alpes-Côte d'Azur and Corsica. It emphasised that Corsica represents a distinct area with separate local authorities and unique environmental characteristics. The Bureau recommended that the government's next report provide greater detail on what falls under which region among the information provided to the Bureau. Given climate change, the Bureau emphasised the need to prevent large-scale fires (megafires), particularly in dry regions prone to forest fires, and recommended strengthening controls and preventive measures to effectively protect tortoise habitats. The Bureau advised ensuring the full implementation of these preventive measures and requested regular updates on their progress. Specifically, this includes monitoring agricultural activities that have allegedly ignited megafires and enhancing oversight of landowners to ensure sufficient fire prevention measures are in place during high-risk periods e.g., rigorously requiring landowners to clean up the land to prevent the easy propagation of fires.

The Bureau encouraged increased efforts to raise awareness among stakeholders involved in this case about Hermann's tortoise conservation in order to minimise the impact of human activities. Furthermore, the Bureau strongly recommended joint awareness-raising campaigns between the authorities and the civil society complainants on this issue. The authorities are also encouraged to involve the complainants in all other preventive actions, data collection, training, and the expansion of protection perimeters.

The Bureau expressed its wish to be informed of progress, including the results of the ongoing 2018-2027 action plan and the illustration of effective implementation of prevention and compensation measures in the areas mentioned in the present decision, so that the authorities can demonstrate the

effectiveness of conservation measures and ensure that France fulfils its obligations under the Convention and achieves a favourable conservation status for Hermann's tortoise.

Both parties were requested to submit their progress reports for the Bureau meeting in Spring 2026.

The complaint remains on **new (pending)**.

➤ 2024/02: Ukraine: Deforestation in an Emerald Network site (UA0000338) in Kyiv Region (MH)

Decision: The Bureau thanked the authorities for their report.

While the Bureau expressed solidarity with Ukrainian people, it inquired why the authorities had chosen to create the military cemetery in an Emerald Network site. The Bureau further considered that size proportion of the land plot allocated to the cemetery could justify neither the destruction of protected habitats nor the absence of the mandatory environmental impact assessment for the project and requested that the clearing of the area is halted immediately. It asked for further information on hazardous trees and the areas of the site that are affected by this.

The Bureau invited the authorities to identify alternative land plots outside the Emerald Network for the creation of the military cemetery and to involve the complainant as well as other stakeholders in the design of the project and to carry out an impact assessment on the species that could potentially be affected by the creation of the cemetery.

The Bureau further inquired as to how the authorities are planning to implement the Resolution of the Sixth Administrative Court of Appeal, of 16 January 2025, in court case No. 320/33830/24 invalidating and declaring unlawful Resolution No. 225 of the Cabinet of Ministers of Ukraine, which allowed for the construction of the cemetery, and whether they intend to appeal the decision.

In case the authorities decide nevertheless to go ahead with the construction in the selected area, the Bureau requested a detailed mitigation plan to be presented, with concrete measures to be explained.

Both parties were requested to submit their progress reports for the Bureau meeting in Autumn 2025.

The complaint **remains new (pending)**.

6.6 New complaint forms received

➤ *Wolf issues*

The Secretariat received about six hundred complaint forms against the EU proposal to downgrade the protection of grey wolf (*Canis lupus*) from Annex II to Annex III of the Bern Convention. Most of the complaints follow a similar pattern and were submitted ahead of the decision of the 44th Standing Committee meeting in December 2024 to modify the species protection. Some complaints refer to specific Parties. The complaints which are eligible will be processed. Relevant parties to the Bern Convention will be asked to report in due time, in view of the consideration of the content of the complaints by the Bureau at its meeting in Autumn 2025.

Decision: The Bureau took note of the information.

➤ *Other new complaint forms received*

The Secretariat informed the Bureau of several other new complaint forms submitted. Their admissibility is currently being processed. Those considered admissible will be scheduled for discussion in next year's Bureau meetings.

Decision: The Bureau took note of the complaint forms received and their eligibility.

The Bureau advised to consider the EU, represented by the European Commission, as the only respondent in what concerns the negative consequences of lowering the protection status of the wolf.

7. ANY OTHER BUSINESS

7.1. Dates of the next Bureau meetings

The Secretariat suggested holding the 2nd Bureau meeting in the week of 16-20 June 2025 and the 3rd Bureau meeting in the week of 15-19 September 2025.

Decision: The Bureau took note of the suggested dates and decided to hold the next meetings on 18-20 June 2025 and 16-18 September 2025.

7.2. Presentation of the webpage dedicated to the sturgeons

The Bureau was reminded that, following the adoption by the 44th Standing Committee of the guidelines on habitat monitoring, population monitoring and ex-situ conservation measures, the Secretariat had been asked to make sturgeon activities more visible on the website.

The Secretariat presented the new [webpage](#) dedicated to the resources of the Bern Convention for the conservation of sturgeon.

Decision: The Bureau took note of this new webpage dedicated to the conservation of sturgeon.

Appendix I – Agenda

1. OPENING OF THE MEETING & ADOPTION OF THE AGENDA

1.1. Adoption of the agenda

2. REPORT FROM THE SECRETARIAT

2.1. Follow up on the Summit of the Heads of State and Government of the Council of Europe on 16-17 May 2023 in Reykjavík, Iceland

- Ad hoc Multidisciplinary Group on the Environment (GME)

2.2. Staff announcements

3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION

3.1. Voluntary contributions received in 2024 and 2025: state of play

[T-PVS/Inf(2024)08Rev2 - Table of the voluntary contributions received in 2024]

[T-PVS/Inf(2025)18 - Table of the voluntary contributions received in 2025]

3.2. Report on the use of the resources from the Special Account of the Bern Convention

3.3. Working Group on overseeing implementation of the Strategic Plan

[T-PVS(2025)01 – Report of the 3rd meeting of the Working Group overseeing the implementation of the Strategic Plan]

[T-PVS/Inf(2025)05 – Draft questionnaire for the 2025 voluntary national updates on the implementation of the Strategic Plan]

3.4. Working Group on exploring mechanisms to guide amendments to the appendices of the Bern Convention

[T-PVS(2025)03 – Report of the 1st meeting of the Working Group on exploring mechanisms to guide amendments to the appendices of the Bern Convention]

4. IMPLEMENTATION OF THE PROGRAMME OF ACTIVITIES AND BUDGET FOR 2025

[Calendar of meetings 2025]

[T-PVS(2024)09 - Programme of Activities and budget for 2025]

4.1. European Diploma for Protected Areas

[T-PVS/Agenda(2025)04 - Draft Agenda of the meeting of the Group of Specialists on the European Diploma for Protected Areas]

[T-PVS/Agenda(2025)05 - Draft agenda of the celebratory event of the 60th anniversary of the European Diploma]

[T-PVS/DE(2025)06 - Draft Granada Declaration]

[T-PVS/Agenda(2025)08 - Draft agenda of the roundtable of the managers of the European Diploma holding areas]

- State of preparation of the 60th anniversary
- Communication campaign

4.2. Emerald Network: Workplan for 2025

4.3. Reporting under Resolution No. 8 (2012) on the conservation status of species and habitats

4.4. Joint meeting with the CMS MIKT on IKB and Group of Experts on the Conservation of Birds

4.5. Follow-up to the decisions of the Standing Committee to downlist the wolf (*Canis lupus*) from Appendix II to Appendix III of the Convention

4.6. Large Carnivores

4.7. Group of Experts on Amphibians and Reptiles

[T-PVS/Agenda(2025)11 Draft Agenda of the meeting of the Group of Experts on the Conservation of Amphibians and Reptiles]

4.8. Group of Experts on Invasive Alien Species

[T-PVS/Agenda(2025)10 Draft Agenda of the meeting of the Group of Experts on Invasive Alien Species]

5. MONITORING OF THE IMPLEMENTATION OF THE LEGAL ASPECTS OF THE CONVENTION (Biennial reporting and Online reporting system)

5.1. Online Reporting System

6. IMPLEMENTATION OF THE CONVENTION: CASE-FILES

*[T-PVS/Notes(2025)1 – Summary of open and possible case files]
[T-PVS/Notes(2025)2– Summary of complaints on stand-by]
[T-PVS/Notes(2025)3– Summary of new & pending complaints]
[T-PVS/Inf(2025)17– Register of Bern Convention's case-files]*

6.1. Methodology proposed by the UK for monitoring the implementation of recommendations arising from individual case files

6.2. Open files

- 1986/08: Greece: Recommendation No. 9 (1987) on the protection of *Caretta caretta* in Laganas Bay, Zakynthos

*[T-PVS/Files(2025)1986-08_gov - Government Report]
[T-PVS/Files(2025)1986-08_comp - Complainant Report]*

- 1995/06: Cyprus: Akamas peninsula

*[T-PVS/Files(2025)1995-06_gov - Government Report]
[T-PVS/Files(2025)1995-06_comp - Complainant Report]*

- 2010/05: Greece: Threats to marine turtles in Thines Kiparissias

*[T-PVS/Files(2025)2010-05_gov - Government Report]
[T-PVS/Files(2025)2010-05_comp - Complainant Report]*

- 2012/09: Türkiye: Presumed degradation of nesting beaches in Fethiye and Patara SPAs

*[T-PVS/Files(2025)2012-09_gov - Government Report]
[T-PVS/Files(2025)2012-09_comp - Complainant Report]*

- 2013/01: North Macedonia: Hydro power development within the territory of the Mavrovo National Park

*[T-PVS/Files(2025)2013-01_gov - Government Report]
[T-PVS/Files(2025) 2013-01_comp - Complainant Report]*

- 2016/05: Albania: Presumed negative impact of developments on the Vjosa river including hydro-power plant development and Vlora International Airport

[T-PVS/Files(2025)2016-05_gov - Government Report]
[T-PVS/Files(2025)2016-05_comp - Complainant Report]

- 2017/02: North Macedonia: Negative impacts to Lake Ohrid and Galichica National Park candidate Emerald Sites due to infrastructures developments

[T-PVS/Files(2025)2017-02_gov - Government Report]
[T-PVS/Files(2025)2017-02_comp - Complainant Report]

- 2019/05: Türkiye: Habitat destruction in Mersin Anamur Beach

[T-PVS/Files(2025)2019-05_gov - Government Report]
[T-PVS/Files(2025)2019-05_comp - Complainant Report]

- 2020/09: Bosnia and Herzegovina: Possible negative impact of hydro-power plant development on the Neretva River

[T-PVS/Files(2025)2020-09_gov - Government Report]
[T-PVS/Files(2025)2020-09_comp - Complainant Report]

- 2022/03: Norway: Wolf culling policy

[T-PVS/Files(2025)2022-03_gov - Government Report]
[T-PVS/Files(2025)2022-03_comp - Complainant Report]

- 2023/03: Switzerland: New wolf culling policy

[T-PVS/Files(2025)2023-03_gov - Government Report]
[T-PVS/Files(2025)2023-03_comp - Complainant Report]

6.3 Possible files

- 2001/04: Bulgaria: Motorway through the Kresna Gorge

[T-PVS/Files(2025)2001-04_comp_gov – Government / Complainant Report]

- 2020/04: Armenia: The Amulsar gold mine project and its impacts on Emerald Network sites

[T-PVS/Files(2025)2020-04_gov - Government Report]
[T-PVS/Files(2025)2020-04_comp - Complainant Report]

- 2022/06: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region

[T-PVS/Files(2025)2022-06_gov - Government Report]
[T-PVS/Files(2025)2022-06_comp - Complainant Report]

6.4 Complaints on stand-by

- 2016/09: Georgia: Possible threat to “Svaneti 1” Candidate Emerald Site (GE0000012) from Nenskra Hydro Power Plant development

[T-PVS/Files(2025)2016-09_gov - Government Report]
[T-PVS/Files(2025)2016-09_comp - Complainant Report]

- 2018/01: Ukraine: Presumed threat to Emerald site “Polonina Borzhava” (UA0000263) from wind energy development

[T-PVS/Files(2025)2018-01_gov - Government Report]
[T-PVS/Files(2025)2018-01_comp - Complainant Report]

- 2018/05: Ukraine: Alleged threats to the Emerald Network sites Skhidnyi Svydovets, Marmaroski ta Chyvchyno-Hryniavski Hory and Carpathian Biosphere Reserve

[T-PVS/Files(2025)2018-05_gov - Government Report]
[T-PVS/Files(2025)2018-05_comp - Complainant Report]
- 2019/04: United Kingdom: Badger Culling Policy in England

[T-PVS/Files(2025)2019-04_gov - Government Report]
[T-PVS/Files(2025)2019-04_comp - Complainant Report]
- 2020/06: Portugal: Presumed threat to Tagus Estuary Special Protected Area from a new airport

[T-PVS/Files(2025)2020-06_gov - Government Report]
[T-PVS/Files(2025)2020-06_comp - Complainant Report]
- 2021/02: Norway: Alleged threat to birds and protected sites due to the proposed construction of windfarms

[T-PVS/Files(2025)2021-02_gov - Government Report]
[T-PVS/Files(2025)2021-02_comp - Complainant Report]
- 2021/05: Germany: Habitat loss in Baden-Württemberg threatening the conservation of *Tetrao urogallus*

[T-PVS/Files(2025)2021-05_gov - Government Report]
[T-PVS/Files(2025) 2021-05_comp - Complainant Report]
- 2021/06: France: Conservation of the Western hazel grouse (*Tetrastes bonasia rhenana*)

[T-PVS/Files(2025)2021-06_gov - Government Report]
[T-PVS/Files(2025) 2021-06_comp - Complainant Report]
- 2022/01: Serbia: Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure constructions

[T-PVS/Files(2025)2022-01_gov - Government Report]
[T-PVS/Files(2025) 2022-01_comp - Complainant Report]
- 2022/02: Austria: Alleged violation of the Convention in relation to deliberate killing of *Lutra lutra*

[T-PVS/Files(2025)2022-02_gov - Government Report]
[T-PVS/Files(2025)2022-02_comp - Complainant Report]
- 2022/04: Montenegro: Hydropower plant development on Emerald Network site Komarnica (ME000000P)

[T-PVS/Files(2025)2022-04_gov - Government Report]
[T-PVS/Files(2025)2022-04_comp - Complainant Report]
- 2022/07: Bosnia and Herzegovina: Possible negative impact of mining activities in Trstionica – Gornja Bukovica and Vareš

[T-PVS/Files(2025)2022-07_gov - Government Report]
[T-PVS/Files(2025) 2022-07_comp - Complainant Report]
- 2023/01: Albania: Alleged habitat destruction due to the construction of the Skavica Hydropower Plant on the Drin River

[T-PVS/Files(2025)2023-01_gov - Government Report]
[T-PVS/Files(2025)2023-01_comp - Complainant Report]

6.5 New complaints

- 2024/01: France: Alleged insufficient protection of the Hermann's tortoise (*Testudo Hermanni*)

[T-PVS/Files(2024)39 – Complaint form]

[T-PVS/Files(2025)2024-01_gov - Government Report]

[T-PVS/Files(2025) 2024-01_comp - Complainant Report]

- 2024/02: Ukraine: Deforestation in an Emerald Network site (UA0000338) in Kyiv Region

[T-PVS/Files(2024)74 – Complaint form]

[T-PVS/Files(2025)2024-02_gov - Government Report]

[T-PVS/Files(2025)2024-02_comp - Complainant Report]

6.6 New complaint forms received

- Wolf issues
- Other new complaint forms received

7. ANY OTHER BUSINESS

7.1. Dates of the next Bureau meetings

7.2. Presentation of the webpage dedicated to the sturgeons

Appendix II – List of participants

CHAIR

Mr Carl AMIRGULASHVILI, Head of Biodiversity and Forestry Policy Department, Ministry of Environmental Protection and Agriculture, Georgia

VICE-CHAIR

Mr Claude ORIGER, Policy Adviser, Ministry of the Environment, Climate and Sustainable Development, Luxembourg (Excused)

BUREAU MEMBERS

Mr Charles-Henri de BARSAC, International and European Wildlife Agreements Officer, Sub-Directorate for the Protection and Restoration of Terrestrial Ecosystems, Ministry for Ecological and Solidarity Transition, France

Ms Merike LINNAMÄGI, Advisor, Biodiversity Conservation Department, Ministry of the Climate, Estonia

Mr Burak TATAR, Senior Specialist, Directorate General of Nature Conservation and National Parks, Department of Wildlife Management, Ministry of Agriculture and Forestry, Türkiye

INVITED EXPERT

Ms Leah FARQUHARSON, International Biodiversity Adviser, Joint Nature Conservation Committee (JNCC), United Kingdom

SECRETARIAT

Council of Europe / Directorate of Social Rights, Health and the Environment

Mr Mikaël POUTIERS, Secretary of the Bern Convention

Ms Marta MEĎLIŇSKA, Project Manager

Mr José AMENGUAL RAMIS, Policy Adviser

Mr Michaël NGUYEN, Administrative and Project officer

Mr Mark BARLOW, Administrative assistant

Ms Irina SPOIALA, Administrative assistant

Ms Lilas HEULLANT, Trainee