



Strasbourg, 9th October 2024

T-PVS(2024)11

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

44th meeting

Meeting of the Bureau

10-12 September 2024
(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, Ms Merike Linnamägi, opened the third ordinary meeting of the Bureau of the Standing Committee to the Bern Convention for 2024.

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 to the Summit of the Heads of State and Government of the Council of Europe on 16-17 May 2023 in Reykjavik, Iceland

The Secretariat informed the Bureau that the terms of reference for the ad hoc Multidisciplinary Group on the Environment (GME) were discussed by the Rapporteur Group on human rights (GR-H) on 9 July 2024 and subsequently adopted by the Committee of Ministers on 10 July 2024.

Consequently, the first meeting of the GME is scheduled for 25-27 September, with a second meeting planned for November and a third for February. The GME is tasked with developing a Council of Europe Strategy on the environment and a corresponding action plan by its third meeting, with the objective of having these documents adopted by the ministerial session of the Committee of Ministers in May 2025.

The Chair of the Bern Convention has kindly agreed to represent the Standing Committee of the Bern Convention at the GME meetings.

Decision: The Bureau took note of the information provided. It thanked its Chair for her commitment to represent the Bern Convention at the meetings of the ad hoc Multidisciplinary Group on the Environment. The Bureau asked to be kept informed of any developments, in particular regarding the outcomes of the meeting and the progress on the Council of Europe Strategy on the Environment.

3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION

3.1. Draft Protocol amending the Bern Convention: state of play

The Secretariat informed the Bureau that the 7th meeting of the Ad hoc Drafting Group of an Amending Protocol will take place on 8-9 October 2024.

The meeting will provide an opportunity to discuss potential revisions to the draft text, as well as address matters related to the trust fund. The Chair of the Ad hoc Drafting Group will report to the Standing committee on the outcomes of this meeting.

Decision: The Bureau took note of the information and asked to be kept informed of any new developments on the sustainable financing of the Bern Convention.

3.2. Voluntary contributions received in 2024: state of play

The Secretariat informed the Bureau that 6 Parties had provided €56 000 representing €19 650 more than their suggested share in [Resolution No. 9 \(2019\)](#). 2 further Parties had announced a voluntary contribution.

The Secretariat commented that last year in September, 11 Parties had provided €112 000.

The Secretariat felt that there was a decreasing trend in voluntary contributions and that Parties seemed to be slightly slower in paying their voluntary contributions than in the past years. A reminder sent by the Chair could be useful.

Decision: The Bureau took note of the state of play of the voluntary contributions received and thanked the Contracting Parties which had already provided a voluntary contribution. It recalled that until a more sustainable mechanism would be in place, 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 speed up the procedures for providing their contributions.

The Bureau mandated the Secretariat to draft a reminder letter at the signature of 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 in case of available unspent budget. The letter would point to activities which would require funding.

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

The Secretariat informed the Bureau that so far only staff costs and the costs of the 2nd meeting of the National Focal Points for the conservation of Sturgeons had been charged to the Special Account.

It further informed that it did not plan other expenditures from the Special Account as several activities funded by the Ordinary Budget could not take place. The released funds from the Ordinary Budget would be reallocated to the activities scheduled until the end of the year.

Decision: The Bureau took note of the information provided.

3.4. Working Group on overseeing implementation of the Strategic Plan

The Secretariat informed the Bureau that the 2nd meeting of the Working Group on overseeing implementation of the Strategic Plan took place online on 29 August 2024.

The Working Group examined the feedback received in writing on proposed indicators aimed to measure progress in the implementation of the Strategic Plan and agreed on a way forward. The suggested follow up actions would serve as a basis for drafting a roadmap of the forthcoming work of the Working Group. The Working Group also examined a draft questionnaire for voluntary national updates on the implementation of the Strategic Plan ([T-PVS/Inf\(2024\)12rev](#)). The questionnaire aimed to understand whether the implementation of the Strategic Plan was underway and whether Parties were facing challenges. A compilation of replies would be presented to the 44th Standing Committee.

Decision: The Bureau welcomed the questionnaire and mandated the Secretariat to send it out to all Contracting Parties. The Bureau encouraged Parties to reply to the questionnaire even if it was a voluntary exercise.

4. IMPLEMENTATION OF THE PROGRAMME OF ACTIVITIES AND BUDGET FOR 2024

4.1. [Emerald Network](#)

The Secretariat recalled that the Group of Experts on Protected Areas and Ecological Networks supported a two-step approach regarding the legal framework of the Emerald Network.

1. To prepare a document bringing together in an accessible language what can presently be stated with confidence, based on the Convention and current Resolutions and Recommendations, about the obligations of parties regarding Emerald Network sites, distinguishing clearly between binding and non-binding commitments. This document could take the form of a recommendation of the Standing Committee to the Bern Convention.
2. To prepare detailed guidance documents on currently unclear requirements (results to be achieved under Article 4 of the Convention, monitoring and reporting, site protection status, site management measures, assessment and authorisation of projects, scope for exceptions under Article 9 of the Convention) and to give priority to areas which directly stem from the provisions of the Convention.

To fulfil the first step above, a draft Recommendation on the further clarification of the obligations of Contracting Parties regarding the conservation of Emerald Network (T-PVS(2024)PA11) had been drafted and circulated among the members of the Group of Experts prior to its submission to the 44th Standing Committee.

The Bureau suggested a number of amendments to the draft recommendation. It also enquired whether a timeline for the development of the guidelines referred to in the second step above had already been agreed on. The Secretariat had planned the development of one guideline each year and would evaluate progress after 2 years. The Standing Committee should nevertheless advise the Group of Experts on Protected Areas and Ecological Networks on the areas to be considered in priority.

Decision: The Bureau welcomed the progress achieved on the legal framework of the Emerald Network and invited the Standing Committee to consider adopting the draft Recommendation on the further clarification of the obligations of Contracting Parties regarding the conservation of Emerald Network sites (T-PVS(2024)PA11rev).

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

The Secretariat informed the Bureau that 6th meeting of the *Ad hoc* Working on Reporting would take place on 25 October 2024. It aimed to finalise the checklists of species and habitats, the reporting format, the reporting guidelines, the validation rules, the list of Invasive Alien Species prior their submission to the 44th Standing Committee for approval.

The Secretariat further informed that it had started discussing with the European Environment Agency the financial and technical implications of the adaptation of the reporting tool. Financial resources had been provisioned in 2025 for the development of the reporting tool.

Decision: The Bureau acknowledged the important work completed and looked forward to the submission of the documentation of the reporting under Resolution No. 8 (2012) to the 44th Standing Committee for approval.

4.3. Group of Experts on the [Conservation of Wild Birds](#) and IKB

The Secretariat presented the difficulties faced in preparing the 5th joint Bern Convention - CMS meeting on Illegal Killing, Taking and Trade of Wild Birds (IKB), meant to be held back-to-back with the 8th meeting of the Group of Experts on the Conservation of Birds in Istanbul, Türkiye, in early October 2024. The joint meeting on IKB was finally cancelled due to administrative obstacles and is expected to take place in the first semester of 2025, in a venue to be identified.

Decision: The Bureau took note of the information, acknowledged that the joint meeting on IKB was postponed to 2025 and advised the Secretariat to explore whether the meeting of the Bern Convention Group of Experts on the Conservation of Birds could be held in Türkiye before the end of the year. The Secretariat was also advised to reconvene both meetings in the back-to-back format in the future, in view of its added value for all the stakeholders.

4.4. [Large Carnivores](#)

The Secretariat informed the Bureau about the plan to organize the Group of Experts on Large Carnivores meeting in early 2025. The Bureau was also notified that an external consultant would be tasked with preparing a draft questionnaire on the implementation of the recommendations of the Standing Committee referring to large carnivores, balancing width and depth of the requested information.

No development was noted in relation to the possible new modalities of the functioning of the Dinaric-Balkan-Pindos Large Carnivore Initiative.

Decision: The Bureau took note of the information.

4.5. Action Plan for the eradication of the Ruddy Duck in Europe: state of play

The Secretariat informed the Bureau that, due to unforeseen circumstances, the expert meeting on the implementation of the Action Plan for the eradication of the Ruddy Duck in Europe has been postponed. It is suggested that a short online meeting take place before the upcoming meeting of the Standing Committee in December to take stock of the current situation regarding the eradication efforts and results

in member countries (Belgium, France, Germany, the Netherlands, the United Kingdom and possibly Spain).

As next year marks the final year of the current Action Plan, a larger review of the situation will be necessary to decide whether to conclude or renew the plan.

Decision: The Bureau took note of the information.

4.6. Pan-European Action Plan for the conservation of Sturgeons

The Secretariat recalled that the 2nd meeting of the National Focal Points for the conservation of Sturgeons took place in Strasbourg on 10 – 11 June 2024.

The Secretariat informed the Bureau that participants in the meeting examined draft guidelines on [habitat assessment](#), [population monitoring](#) and [ex situ conservation measures](#) and supported that the guidelines were presented to the Standing Committee for approval, possibly in the form of recommendations.

The guidelines had been circulated among all National Focal Points for comments. Their scope was for the time being limited to the EU and adjustments were required in order to fit into a recommendation of the Standing Committee to the Bern Convention.

The Secretariat had already drafted a recommendation ([T-PVS\(2024\)07](#)) for the consideration of the Bureau.

Decision: The Bureau welcomed the guidelines on habitat assessment, population monitoring and *ex situ* conservation measures and invited the 44th Standing Committee to consider adopting them as recommendations pending their scope is enlarged to all range Contracting Parties to the Bern Convention.

5. [44TH STANDING COMMITTEE MEETING](#)

5.1. Draft Agenda

The Secretariat presented a preliminary draft agenda for the 44th meeting of the Standing Committee.

The Bureau discussed the format of the meeting and agreed that it would be held exclusively in person in Strasbourg.

Taking into account the heavy meeting agenda, the Bureau also agreed that, as in later years, the meeting would begin on the Monday afternoon (2nd December) and end on Friday 6th December 2024, noon.

Decision: The Bureau took note of the preliminary draft agenda for the 44th meeting of the Standing Committee. It decided that the meeting will be held in person in Strasbourg from Monday afternoon, 2nd December to Friday 6th December 2024, noon.

5.2. Programme of Activities 2025-2026

The Secretariat presented a two-year draft Programme of activities (T-PVS(2024)09) on the reasonable assumption that the increase of the Ordinary Budget adopted by the Committee of Ministers in 2023 would be maintained.

For 2025, the joint meeting with the Convention on Migratory Species on Illegal Killing of Birds had been rescheduled and the meetings of the Groups of Experts on Large Carnivores and on Amphibians and Reptiles had been planned. An online meeting of the ad hoc Working Group on the conservation of marine turtles is also scheduled. It could consider the way to check how the [guidance tool](#) on the conservation of sea turtle nesting sites is implemented by the relevant parties and the feasibility of a workshop on this matter.

The Secretariat emphasised that an important activity would be the 60th anniversary of the European Diploma for Protected Areas.

The preparation of the reporting under Resolution No. 8 (2012) would also continue with the development of the reporting tool and the training of non-EU Contracting Parties.

For 2026, the Group of Experts on Invasive Alien Species and the 3rd meeting of the National Focal Points for the conservation of Sturgeons had been planned. The reporting under Resolution No. 8 (2012) would enter its final phase with the assessment and analysis of the reports received as well as the display of a number of indicators online.

Over the biennium, strengthened communication with youth organisations and the design cooperation activities aimed to support Contracting Parties to resolve or prevent case-files had also been planned.

Decision: The Bureau welcomed the proposed Programme of activities for 2025 and 2026.

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

The Secretariat recalled that, as it was the intermediate year of the biennial reporting cycle, there was no new report launch this year, just a reminder sent to Contracting Parties to complete their reports if not already done so. Countries which do not regularly submit their biennial reports were also contacted for an individual follow-up, recalling that this was an obligation, and checking if there was a reason behind the lack of reporting.

The Secretariat presented the latest developments on the Proposed Transition Plan to move to the new online reporting system.

Decision: The Bureau took note of the latest developments on the Proposed Transition Plan for the new online reporting system, supported the Secretariat approach, and reminded the Contracting Parties of the importance of a smooth transition to this system.

The Bureau requested the Secretariat to learn of the possibility to integrate different reports and data in the new system using the data reporting tool. In addition, given that the advertised enhancements to ORS indicate data analysis opportunities for visualisation, mapping of trends etc, it would also be useful to learn more of the extent and opportunities to use that functionality.

7. IMPLEMENTATION OF THE CONVENTION: CASE-FILES

The Bureau noted that in several case-files, national and local or regional authorities appear to have difficulty working together, noting that on some occasions it appears that while one level of government was doing its best to improve the situation, the other level appeared reluctant to see changes in the situation.

Decision: The Bureau decided that, in addition to communicating its decisions to the national authorities through the National Focal Point, its decisions should be transmitted, for information, to the local or regional authorities concerned by a case-file, via the Permanent Representation of the country concerned, clearly specifying that the Bureau requests only one report from the authorities, and not several.

7.1. 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.

The Bureau took note of the series of guidance documents on the effective monitoring and management of sea turtles in Zakynthos published by the local Management Unit of NECCA/OFYPEKA as well as of the methodology guidance document on the monitoring and adapted management of sea turtles in the Mediterranean Sea published in 2020 by Marine Turtle Working Group (MedPAN Collection) It requested to be informed on the implementation of these guidance documents as well as the [guidance](#)

[tool](#) on the conservation of sea turtles nesting sites adopted by the Standing Committee of the Bern Convention in December 2023.

The Bureau took note of the concerns of the complainant that financial and human resources in the Management Unit of the National Marine Park of Zakynthos (NMPZ) were still insufficient, with, as a consequence, illegal activities which continued to be observed (human presence in the restricted nesting areas, access of the beach at night, horse riding, very high marine traffic and boat speed limit exceeded, excessive turtle spotting activities). In addition, cordoning of the nesting areas remained insufficient. The Bureau therefore endorsed the complainant request to increase and ensure a stable funding to the NMPZ and Management Unit, in particular for warden resources, to develop an effective wardening system, and to increase the enforcement of the National and NMPZ regulations, especially within the maritime area.

The Bureau remained concerned with the illegal constructions and illegal businesses in Dafni and the additional touristic facilities in the area. It requested both parties to take stock of this situation, the legality of the constructions and businesses established in the area and, where appropriate, the timeline and measures taken to remedy the situation, including demolition of illegal buildings, and restoration of the beach and its surroundings.

The Bureau took note that the Commission referred Greece to the Court of Justice of the European Union for failing to close the landfill on the island of Zakynthos. It requested to be informed of the outcome.

The Bureau welcomed that the 5th Report on the conservation status of *Caretta caretta* was under way and was expected to be published in the coming months. It requested that this report be presented when available.

The Bureau underlined that the Standing Committee didn't request the authorities to comment on or intervene in decisions of Justice but to be informed on the follow-up given to the decision taken by the Supreme Court which rejected the appeal of the offender accused of illegal road constructions in the area. It reiterated this request since this is the role of the authorities to ensure that court decisions are implemented, and that, according to the complainant, the restoration of the illegally constructed road was still pending. It also asked to be informed of other proceedings pending before courts mentioned by the complainant in its report.

Finally, the Bureau took note of the complainant's renewed request for an on-the-spot appraisal (OSA) to update [Recommendation No.9 \(1987\)](#).

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No.9 \(1987\)](#).

➤ 1995/06: Cyprus: Akamas peninsula

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

The Bureau recalled that in its decision of September 2023, it welcomed the fact that the Memorandum of Understanding (MoU) that had been signed between the Department of Fisheries and Marine Research (DFMR) and the complainant the previous year had been trialed at the beginning of the summer 2023 and that the complainant was to be actively involved in the protection of marine turtles in Cyprus. This was supposed to involve recruiting, managing, training and guiding groups of volunteers who would be patrolling turtle nesting beaches every day during the nesting period to locate possible nests and inform the monitoring team, running informational and educational actions to raise awareness of the general public and visitors at the nesting beaches, and assisting in conservation actions. It asked

both parties for feedback in their next reports. Regretting that the complainant's report didn't refer to the implementation of this MoU, the Bureau therefore requested both parties to send information on this issue.

The Bureau highlighted that, according to the complainant, the Government has not yet put into force any appropriate management measures through legally binding mechanisms while such measures are foreseen by the proposed Management Plans which still do not have legal force. It called on the Government to step up its efforts in this matter.

The Bureau took note that, further to a Formal Notice on 9 June 2021 and a Reasoned Opinion on 6 April 2022, the Commission decided on 13 March 2024 to refer Cyprus (INFR(2021)2064) to the Court of Justice of the European Union for failing to designate sites of community importance (SCIs) as special areas of conservation (SACs) for the protected areas of the Natura 2000 Network and to establish the necessary conservation objectives and measures for these sites. It noted that, as regards the Akamas Peninsula, conservation objectives have been established but not conservation measures. The Bureau requested to be kept informed on the follow-up given to this.

The Bureau also noted that, further to a Formal Notice on 27 November 2019 and in the framework of an active infringement procedure (INFR(2019)2303) regarding the systemic and persistent breach of application of Article 6(3) of Directive 92/43/EEC on the inadequate Appropriate Assessment (AA) of several plans and projects in Cyprus, the European Commission sent a Reasoned Opinion on 13 March 2024. Seven out of 29 projects included in the active infringement procedure, and which have not been subject to AA are situated within and/or adjacent to Natura 2000 areas in Akamas Peninsula, including the "Limni Bay Project". The Bureau also requested to be kept informed on the follow-up given to this.

According to the complainant, in May 2024, the Mines Service has launched a public procurement for the preparation of a joint Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) study for the creation of a new Quarrying Zone in Androlikou, adjacent to the Natura 2000 sites. The Bureau requested information on this new project.

Finally, the Bureau reiterated the serious concern expressed by the Standing Committee at its 43rd meeting (December 2023) that after so many years the majority of the thirteen points of [Recommendation No. 191 \(2016\)](#) were still not fully followed-up by the authorities and that according to interested actors the main threats remained. The Bureau urged the Cypriot authorities to step up efforts to implement all points of the Recommendation and invited the Standing Committee to consider the possible need for an on-the-spot appraisal (OSA) to help in the process.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No. 191 \(2016\)](#).

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

Decision: The Bureau thanked both parties for their reports.

The Bureau appreciated that the study over the regulation and limitation of human activities on the beaches within the protected area of Kyparissia Bay based on their carrying capacity was concluded but regretted that the proposed measures haven't been put in effect yet. It requested to be informed on the content of the study and its implementation.

The Bureau noted that recruitment to reinforce the patrol and the surveillance in the area was underway. It also noted that, according to the authorities, informative signs have been placed on the beaches, even though the complainant reported that such signs were not seen.

It also observed that a Joint Ministerial Decision (reference no. YPEN/GDPP/35330/646, Government Gazette no. 2364/B/19.4.2024) was issued in April 2024 aiming to set several terms and restrictions in highly protected beaches and coasts across the country including also Thines Kiparissias and particularly the nesting core area of the sea turtles. The Bureau requested detailed information on the terms and restrictions set in this Joint Ministerial Decision.

The Bureau was nevertheless extremely concerned with the fact that, despite the above-mentioned authorities' initiatives, the situation in Kyparissia bay remained mainly unchanged for several consecutive years. In particular, it was deeply concerned that a Management Plan for Thines Kiparissias had still not been adopted after a delay of 6 years now, despite repeated statements by the national authorities that it was expected to be issued soon. It urged the national authorities to step up their efforts to adopt a Management Plan this year still, as they stated they would do. It also urged the national authorities to strictly enforce and implement the Presidential Decree's provisions. National authorities must ensure that local authorities deal permanently with existing threats of the protected area such as light pollution, beach furniture, extensive vehicular traffic, free camping, annual local Music Festivals, uncontrolled agricultural and fishing activities, the planting of alien species, the existing illegal roads and constructions, and the constructions of buildings.

The Bureau urged the national authorities to act upon these requests and to fully implement [Recommendation No. 174 \(2014\)](#) in all its aspects.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No. 174 \(2014\)](#), including a presentation of the Management Plan for Thines Kiparissias which is supposed to be adopted by then.

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

Decision: The Bureau thanked both parties for their reports.

The Bureau noted the progress towards finalising the Management Plan for Fethiye with the identification of the characteristics of the area and targets. It nevertheless urged again the authorities to complete it rapidly. It was worried with the developments described by the complainant in its report, in particular in the Çalış B section of the beach (such as boulders put in place, installation of coffee shops and bars, facility run by Fethiye Municipality with wooden walkways, a lifeguard tower, two blocks of dressing cabins, toilets and showers, scaffold for the impaired fixed by chains, large stones and cement, and a new water sports area). The Bureau also felt concerned by the lack of guards in the protected area and the fact that cages were not replaced when stolen.

The Bureau urged the Turkish authorities to step up their efforts to adopt the Management Plan for Patara as soon as possible since it noted that there was no progress in this regard so far. It however appreciated some improvements in the area such as vehicle control, even though it seemed to be limited to the main beach. Elsewhere, human presence was still observed on the sand dunes (as well as horses and vehicle tracks). The Bureau welcomed that the new borders of Patara Special Protection Area were finally shared online.

The Bureau also called on the authorities to provide the necessary resources for the effective protection of all the sections of the beaches.

The request by the Standing Committee having been ignored, the Bureau urged that the next Government report include a comprehensive and updated action plan for implementation and enforcement of Recommendations [No. 182 \(2015\)](#) and [No. 183 \(2015\)](#), including a detailed timeframe for the implementation of all points of the Recommendations as well as an indication of how to measure the success of the actions identified. It encouraged the national authorities and the local authorities to reinforce their cooperation for a better implementation of the Recommendations.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of Recommendations [No. 182 \(2015\)](#) and [No. 183 \(2015\)](#).

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

Decision: The Bureau thanked both parties for their reports.

It regretted that there was no change in the activity status for the file, as acknowledged by the authorities which linked this situation with the fact that the Republic of North Macedonia was in a period of double elections (parliamentary and presidential). The only novelty, according to the complainant, was that the study for the valorisation of the Mavrovo National Park (NP) has been almost finalised and a public hearing was held on 10 June 2024 with all stakeholders.

The Bureau, therefore, reiterated the request made by the Standing Committee in December 2023 that more rapid progress was needed in certain areas. In particular, it requested the authorities to: finalise the process to cancel the concessions for the two planned hydropower plants (HPPs) Ribnicka in Mavrovo NP which had been initiated already in 2023; revoke all other small HPP concessions in Shar Mountain NP; speed up the proclamation of Mavrovo NP; accelerate the adoption of the proposed Law on Water and the amendments to the Law on Nature Protection, which would ensure the development of a methodology for ecological flow, and effectuate a ban on hydropower plants and other infrastructure projects in protected areas; improve and ensure a regular coordination and consultation between State authorities and civil society organisations; and more broadly, ensure implementation of all points of [Recommendation No. 211 \(2021\)](#) within the soonest timeframes.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation no.211 \(2021\)](#).

- 2016/04: Montenegro: Development of a commercial project in Skadar Lake National Park and candidate Emerald site

Decision: The Bureau thanked the authorities for their comprehensive progress report on the implementation of [Recommendation No. 201 \(2018\)](#) of the Standing Committee. Members of the Bureau took note that the majority of the operational recommendations were underway. It regretted that no report had been submitted by the complainant.

In the absence of report of the complainant, the Bureau noted that measures taken by the authorities went into the right direction and that the concerns expressed by the complainant at the 43rd Standing Committee seemed to have been addressed.

The Bureau asked the authorities for a timeline for the finalisation of the Revision Study with a view to the Special Purpose Spatial Plan for the Skadar Lake National Park and the preparation of deriving spatial planning documents.

The Bureau further asked the authorities to update their Emerald Network database and submit it to the Secretariat of the Bern Convention at their earliest convenience.

Finally, the Bureau invited the authorities to speed up the establishment of a management body and plan for the Nature Park "Ulcinj Salina" and to reestablish as soon as possible the Coordinating Body to implement and oversee measures outlined in the Action Plan "Man and Biosphere - Tara River Basin".

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No. 201 \(2018\)](#).

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

Decision: The Bureau thanked both parties for their reports.

The Bureau strongly regretted that the construction of the airport continued in defiance of [Recommendation No. 219 \(2023\)](#) which calls for the suspension of construction until a new and sufficient Environmental Impact Assessment (EIA) procedure is conducted as well as a proper/appropriate assessment.

The bureau noted with sadness the lack of cooperation and dialogue between the government and other key stakeholders, and urged all parties to engage in meaningful discussions to ensure the protection of the environment and biodiversity.

The Bureau insisted on the urgent need for the protection of migratory birds, as they are particularly vulnerable to the consequences of unplanned and unmitigated development. Their habitats must be safeguarded in accordance with international agreements.

The Bureau stressed the importance of conducting a new, thorough EIA, which must include concrete tasks related to mitigation and compensation measures, particularly in relation to migratory birds. Future development work should be strictly based on the findings and recommendations of this new EIA.

The bureau requested concrete data on how the ongoing airport construction and other developments will be mitigated, and calls for specific, actionable mitigation plans to be provided to the Committee.

It further requests an update on the management plan for the area, including details on its contents and how it will be effectively implemented to safeguard the environment.

The Bureau also asked for clarification on how the precautionary principles are being applied in the current and future development activities, ensuring that environmental risks are minimised.

The Bureau reiterated the need for the full protection of the Shushica River ecosystem, considering its ecological importance and its potential vulnerability to the impacts of development.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No. 2019 \(2023\)](#).

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

Decision: The Bureau thanked both parties for their reports. It was however concerned with the fact that the Government report was extremely short and didn't detail progress to each point of [Recommendation No. 221 \(2023\)](#), contrary to what it requested from parties at its Spring meeting, even if it noted that the country had parliamentary and presidential elections in May 2024 with a new Government in charge as of late June 2024. It nevertheless stressed that contributing actively to the complaint procedure was among North Macedonia's obligations, as a party to the Bern Convention.

The Bureau was extremely worried with the fact that the authorities (national and local) appeared to continue ignoring [Recommendation No. 221 \(2023\)](#) during various procedures such as the amending of existing laws or development of new laws, noting that, among other issues, processes seemed to continue in a non-transparent way, that vague definitions could allow unsustainable projects to go ahead and that the situation was even worsening, in particular with illegal constructions continuing to be legalised, new illegal constructions and further urbanisation. It urged the government to implement all aspects of [Recommendation No. 221 \(2023\)](#).

It noted that the North Macedonia's Assembly started on 13th August 2024 the procedure for adoption of the Law on proclamation of Lake Ohrid as a Monument of Nature and of the Law on Proclamation of Studenchishte Marsh as a Park of Nature, but shared the complainant concern that this was done without any prior revision of the proposed zoning and permitted/prohibited activities, when [Recommendation No. 221 \(2023\)](#) requested so. It also noted that following a petition sent by the complainant, the relevant Committee of the Assembly agreed to stop the process of adopting the two laws due to their conflict with [Recommendation No. 221 \(2023\)](#).

Finally, the Bureau understood that the report of the joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission to the World Heritage property 'Natural and Cultural Heritage of the Ohrid region', which took place in March 2024, would be available at the earliest in late September 2024, with a decision taken by the World Heritage Committee at its July 2024 session. It requested the Parties to act upon this report and the decision, and report back.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation No. 221 \(2023\)](#).

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

Decision: The Bureau thanked both parties for their reports and for their efforts to organise and contribute to the on-the-spot appraisal (OSA) on 2-4 July 2024. It also thanked the independent consultant, Dr Alan Rees, for his involvement in the OSA and timely preparation of the provisional report.

The Bureau was pleased that the drilling permit in the vicinity of the nesting beach was cancelled, but regretted that after the OSA some of the businesses operating near the protected beach reverted to the practices that negatively influence the turtles and that some new negative developments were observed, as noted in the complainants' update report (ploughing the beach with construction equipment; caravan camping works on the beach near Dragon River; concrete building construction and burial of a septic tank in the coast of the Anemurion Ancient city; illegal huts and negative effects of the stone walls along the Sultan Stream in the habitat of Nile soft shell turtle).

The Bureau was pleased that the overall results of the OSA were positively evaluated by both the authorities and the complainants, and encouraged their further cooperation in enhancing the situation in all respects. The Bureau appreciated the good will expressed by the local authorities to implement recommendations of the visit and welcomed the support offered by Professor Kaska.

The Bureau requested the Turkish authorities ensure compliance with the Turkish law and the Bern Convention's [Recommendation No. 66 \(1998\)](#) by enforcing the regulations, penalising perpetrators of violations, fixing the lighting in line with the [Guidance tool](#) on conservation of sea turtle nesting sites adopted by the Standing Committee.

The Bureau endorsed the requests made by the complainants in their report, in particular the need for restoring the habitat of the Nile soft-shelled turtles (*Trionyx triunguis*).

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, which will also consider the results of the OSA and a draft recommendation.

➤ 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 Bureau noted with concern that the construction of the HPP Ulog was nearly finalised and the construction of the Upper Horizons HPP scheme continued, as a priority project for the Republika Srpska authorities.

The Bureau acknowledged a rejection by the Supreme Court of Republika Srpska of the lawsuit against the renewal of the environmental permit for HPP Ulog, filed by local NGO “Zeleni Neretva”, as well as ten parallel lawsuits filed by Aarhus Center in Sarajevo and Center in Banja Luka against five construction permits issued for HPP Dabar and the pending case in relation to access to information related to it.

The Bureau took note that the environmental permit renewal procedure for Phase II (of the HES Upper Neretva project, consisting of 4 SHPPs) was temporarily halted by the Ministry of Environment, similarly to Phase I.

The Bureau acknowledged that the 7 SHPPs (HES Upper Neretva - Phase I and II) were still pending, although the Concession Agreement for HES Upper Neretva project seemed no longer valid. It also noted that the projects located in the Federation of BiH (HPP Bjelimići and HPP Glavatičevo, and the Bjelimići pumped storage plant) remained dormant.

The Bureau invited the relevant authorities to follow-up on the Study of Protection of Gornja Neretva and the proposal of Protection Declaration Act and to take the necessary steps to establish the protected habitat Neretva. It appreciated that there seemed to be some positive developments in that regard.

The Bureau appreciated also that the Bern Convention Focal Point was nominated, and that the Complainant attended the Inter-entity Body for Environmental Protection, where the HPP Ulog and HES Upper Neretva project were discussed.

The Bureau recalled that the Neretva River system is a key resource not just for Bosnia & Herzegovina but for the wider region. It reiterated the call of the 43rd Standing Committee for the authorities of Bosnia and Herzegovina to respect and implement the [Recommendation No. 217 \(2022\)](#), including by cancelling concessions for the hydroelectric system Gornja Neretva, and halting other planned HPP projects such as the Upper Horizons project, until the valuable Gornja Neretva area has received an appropriate nature protection. Suspending further operations of Ulog HPP should also be considered, and mitigation measures related to its construction.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of the [Recommendation No. 217 \(2022\)](#).

7.2. Possible files

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

Decision: The Bureau thanked both parties for their reports.

The Bureau welcomed the information of the Secretariat that the [Technical Workshop](#) which was called for by [Recommendation 212 \(2021\)](#) was held on 22-24 April 2024 in the town of Sandanski with a field visit to the Kresna Gorge. It noted that the workshop went well, with both parties demonstrating a constructive spirit, and that [joint conclusions](#) were approved by the participants in the workshop which called for:

- Implementation of possible defragmentation measures on the existing road regardless of further developments;
- Avoidance as much as possible of the destruction of currently unaffected landscapes with new infrastructure developments;
- Avoidance of fragmentation caused by the construction of new infrastructure to bio-corridors of *Canis lupus* and *Ursus arctos*;
- Provision of sufficient measures to ensure the restoration of populations and habitats connectivity of *Testudo graeca*, *Testudo hermanni*, *Elaphe quatuorlineata*, *Elaphe situla* and guarantee daily movements of individuals.

The Bureau took note of the information that an agreement was reached between the European Commission and the authorities in relation to the construction, as soon as possible, of the eastern lane of the Struma motorway outside of the Kresna Gorge (direction from the Greek border to Sofia) (as

stipulated in the approved G10.50 alternative), with the possibility to have the western lane (from Sofia to the Greek border) inside the gorge (with the rehabilitation of the existing road E-79).

It also noted that the Minister of Environment and Water issued on 11 June 2024 an EIA/AA screening Decision No 5-PR/2024 which concluded that there was no need for a new Environmental Impact Assessment (EIA) to be carried out for the modifications of the project, which, according to the authorities, was unlikely to have a significant negative impact on the environment and natural habitats, populations and habitats species subject to conservation in the protected site. The Bureau, however, shared the concerns expressed by the complainant on this decision due to important changes that occurred in the project after 2017 (territories impacted are two times larger with more habitats affected). The Bureau therefore requested information from the authorities on the bases they used to conclude that the modifications of the project were unlikely to have a significant negative impact when no new EIA was conducted. It also recalled that, in case of doubt (“unlikely”), authorities should apply the precautionary principle and not act in a way that could be detrimental to the Conservation of Wildlife and Natural Habitats. The Bureau therefore called for a new EIA to be carried out.

The Bureau also requested the authorities to inform it on the mitigation measures foreseen should the construction of the Sturma motorway outside of the Kresna Gorge (direction from the Greek border to Sofia) and inside the gorge (from Sofia to the Greek border) be carried out, using the expert views expressed during the technical workshop held in Kresna in April 2024 as a basis.

The Bureau also noted that several cases were pending before national courts. It requested to be informed of the arguments put forward before the courts and of any decision taken by them.

The Bureau invited the Standing Committee to consider opening the file.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting, focusing on the issues above and providing a short summary of the state of play of the implementation of [Recommendation 212 \(2021\)](#).

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

Decision: The Bureau thanked both parties for their reports.

The Bureau noticed the contradictory information provided by the authorities and the complainant regarding the operation of the gold mine. While the authorities stated that the works at the mine had been stopped in 2018, the complainant emphasises a statement of the Eurasian Development Bank reading that the exploitation of the mine could start in 2025.

Regarding the revision process of the Emerald Network in Armenia, the Bureau asked the authorities to include the complainant in the consultation process. It further invited the authorities to revitalize the discussions concerning the Jermuk National Park. The Bureau also recalled that nature protection and the application of the Bern Convention extended beyond designated Protected Areas, and that Contracting Parties had an obligation to protect the habitats and species across their whole territories.

Both parties were invited to make a brief presentation at the 44th Standing Committee meeting.

➤ 2022/03: Norway: Wolf culling policy

Decision: The Bureau thanked both parties for their reports with the data on the wolf population in Norway and the South Scandinavian wolf population.

Acknowledging the data it expressed a strong concern over the very limited number of individuals, which combined with the high estimated average inbreeding coefficient implied very significant vulnerability of the population.

The Bureau thanked the Norwegian authorities for the efforts to protect the individuals that spontaneously migrate from Finland/Russia. However, it noted that due to the uncertainty of the impact on enriching the genetic pool of the Norwegian-Swedish population that measure may be insufficient to protect it.

The Bureau welcomed the information provided by the respondent on mitigation and prevention, as well as awareness raising on the role of the species in nature and appreciated the scope of these measures. At the same time, it noted with great concern that the predominant political intention to maintain open grazing in a great majority of the territory supposedly required culling. The Bureau asked for further information about this and the potential increased culling and further diminishing of the wolf management zone. It stated that combined with a possible stricter regulation of the Swedish population, evoked by the complainant, such reduction of the cross-border wolf population was highly worrisome.

The Bureau noted also that extensive culling did not seem to resolve the social conflict and raised the question of the perception of the species versus actual damages it causes. It asked about public policy consultations on the culling, if any, and suggested gradually moving away from its strict target and a very constrained wolf management zone to other policy measures, enhancing co-existence. The Bureau stressed that theoretical danger, social strain or fear and potential damage only did not constitute sufficient basis for derogating from the provisions of the Bern Convention.

The Bureau invited both parties to make a brief presentation at the 44th Standing Committee meeting.

7.3. Complaints on stand-by

- 2017/06: Iceland: Possible negative impact on Breiðafjörður Nature Reserve's authentic birch woods from new road infrastructure

Decision: The Bureau thanked the Icelandic Government and the complainant for their updates on the follow-up to [Recommendation No. 218 \(2022\)](#).

The Bureau noted with regret that further construction projects were being planned in the area, despite ongoing environmental concerns and previous recommendations for caution.

It stressed the importance of conducting clear and comprehensive Environmental Impact Assessments (EIAs) prior to the approval of any new developments. Additionally, it underscored the need of transparency and consistency in the communication with all stakeholders to ensure that environmental and social concerns were fully addressed.

The Bureau regretted the lack of progress regarding the inclusion of the Breiðafjörður area in the Emerald Network and called on the authorities to take the necessary action to move forward in the process, this including completing all necessary preparatory work.

The Bureau requested both the government and the complainants to report on the progress made in the implementation of the Committee's recommendations. In particular, the Bureau sought further information from the government on the new projects being planned in the area, including their potential environmental impacts.

The bureau called on the government and its related institutions to continue the implementation of [Recommendation No. 218 \(2022\)](#).

Both parties were requested to provide updated reports on each point of the Recommendation for the Bureau meeting in Autumn 2025.

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 both the authorities and the complainant for their reports.

It noted the converging information with respect to the ruling of the Supreme Court of Ukraine regarding the cancellation of the permit for the construction of the wind power plant.

The Bureau expressed concern regarding the preparatory works conducted by Atlas Volovets Energy Ltd and the temporary access granted to land plots despite the absence of construction permit and requested both parties to confirm that these works had been stopped to comply with the decision of the Supreme Court of Ukraine and that Atlas Volovets Energy Ltd did not intend to apply for a new permit.

The Bureau agreed to reevaluate the situation in 2025 and invited both parties to provide up-to-date reports structured along the 12 points of [Recommendation No. 213 \(2021\)](#) on the state of play of the project for its 2025 spring meeting.

- 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 both the authorities and the complainant for their report but regretted that the information provided by the authorities had not been updated since 2019.

The Bureau noticed that the different Emerald Network sites concerned by the file had a national protection status. It further took note that the Environmental Impact Assessment for the creation of a ski resort had not been completed and that the project would also require a Strategic Environmental Assessment which had not started. The Bureau requested both parties to confirm that the project had been abandoned.

The Bureau considered that there was no evidence that the Emerald Network sites were still threaten but agreed to reevaluate the situation in 2025 in light of the ruling of the Supreme Court of Ukraine and updated information on the status of the Environmental Impact Assessment and Strategic Environmental Assessment.

The Bureau invited both parties to report back at its 2025 spring meeting.

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

Decision: The Bureau recalled that, at its Autumn 2023 meeting, it welcomed information that the badger culling policy continued to be phased out with no new intensive cull licenses issued after 2022 and that follow-up supplementary badger culling under license would end in 2025. It also recalled in 2023 that, in order to assess the impact of the Strategy finishing in 2025 in relation to the phase out of the badger culling policy, the complaint was kept on stand-by and both parties were requested to report again in view of the Bureau meeting of Autumn 2026.

The Bureau took note of the information submitted by the complainant that on 16 May 2024 Natural England re-authorized 17 existing Supplementary Badger Disease Control licences and granted nine new ones and that, the new Government have indicated that existing badger culling licences would be ‘honoured’. It also noted the complainant’s request for an immediate moratorium on the badger culling policy, and that the authorities enter into formal dialogue with it to discuss the policy.

The Bureau, however, also took note of the contradicting information from the authorities that the current culling policy was still phasing out and that culling in the High Risk and Edge areas will conclude by January 2026.

Without wishing to address the merits of the case-file, the Bureau decided to reverse its previous decision and invited both parties to report back at its spring 2025 meeting in order to clarify the situation.

- 2021/07: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley

Decision: The Bureau thanked both parties for their reports.

It noted that the area in question constituted the habitat of several protected species, including most of the population of Little tern (*Sternula albifrons*), figuring in the Annex II of the Bern Convention, and numerous rare and endemic plant species including *T. scorodonia*, highly endangered in the case of construction of the mine and the landfill. Many other species would be heavily impacted in case of malfunctioning of the future mine, resulting in degrading the quality of water, especially the Jadar River, and soil.

The Bureau acknowledged the decision of the Constitutional Court on 12 July 2024 that repealing the regulation on the designation of the Special Purpose Area for the execution of the “Jadar” project was unconstitutional. It took note of the resulting sequence of events evoked by both parties in their respective reports, including: reopening of the procedure of designating the Spatial Plan of the Special Purpose Area for the execution of the project on 16 July 2024; signing the EU – Serbia “Strategic raw minerals” Agreement on 19 July 2024, which launched a Strategic Partnership on sustainable raw materials, battery value chains, and electric vehicles; Rio Sava Exploration d.o.o., Beograd applying for issuing of environmental protection requirements on 23 July 2024, for the purpose of filing an application for the volume and contents of an EIA study of the project for exploitation and processing of the mineral jadarite “Jadar”; adoption of the Integrated National Energy and Climate Plan of the Republic of Serbia on 25 July 2024.

The Bureau asked about the Strategic Environmental Assessment of the spatial plan, the EIA, estimated risk of a spill, contingency plan with envisaged prevention and mitigation measures, also bearing in mind the potential transboundary impact of the extraction and processing of the lithium ore.

The Bureau expressed its concerns with the lack of public engagement in the decision-making process and strong social tensions around the project. It noted that, allegedly, there were pending cases of corruption and criminal charges against the company and their collaborators. Furthermore, environmental activists were being pressurised and silenced, possibly amounting to smear campaigns and strategic lawsuits against public participation (SLAPPs) against environmental activists. On that issue, the Bureau remarked that the Parliamentary Assembly of the Council of Europe had adopted in January 2024 Resolution 2531 (2024) and Recommendation 2267 (2024) on “Countering SLAPPS: an imperative for a democratic society”, the latter of which recommended that the Committee of Ministers of the Council of Europe “adopts a bold recommendation on countering the use of SLAPPs following CDMSI proposals”; and “encourages and monitors the prompt and effective implementation by the member States of the guidelines set forth by the recommendation, including the wide range of safeguards mechanisms and remedies therein”.

While recognising the need for lithium in reaching the climate targets, the Bureau called for considering all consequences and seeking all plausible options, based on facts, state of the art knowledge, best available technologies and concertation among all stakeholders in identifying optimal means to preserve the protected species and habitats, soil and water resources, in respect of the public participation democratic principles and before any contract, patent or licence is granted.

The Bureau stressed that in 2025 the Bern Convention will organise an event on minimising the negative impact of mining on biodiversity and encouraged the authorities to attend it.

Expressing a strong concern in relation to the potential risks evoked by the Complainant, the Bureau requested further information on the developments, the contents of the Integrated National Energy and Climate Plan and the contents of the EIA studies related to the project and available to date, especially in as far as the transboundary impact of the mine and the planned filtered tailings area are assessed.

Bearing in mind the swiftly evolving situation, sensitivity due to the high social, political, financial and environmental stakes at play, the Bureau decided to bring the case file to the attention of the Steering Committee, for information. It therefore invited both parties to make a brief presentation at the 44th Standing Committee meeting, updating on the most recent developments.

The Bureau decided to maintain the case-file **on stand-by**.

➤ 2021/08: Georgia: Possible threat to Rioni River from the Namakhvani Hydropower Project

Decision: The Bureau thanked both parties for their reports.

The Bureau noted that the Georgian government indicated that the construction of the Namakhvani hydropower plant (HPP) remained pending with ongoing negotiations among stakeholders. The Bureau noted the adoption of the National Energy Policy and integrated National Energy and Climate Plan (NECP) 2030 that includes the role of HPP energy. The Bureau welcomed the Georgian government's stated commitment to nature conservation and safeguarding sturgeon habitats but remained concerned over the future impact of the project and how it may affect the security and welfare of protected species populations. The Bureau would also welcome further information on Energy Strategy and Plans and how they specifically consider the natural environment and the effects of the project upon protected species and habitats.

The Bureau also took note of the Georgian government's statement that the Namakhvani project falls outside the Emerald Network's scope. The Bureau welcomed the inclusion of part of the Rioni delta in the Kolkheti Protected Area, along with the accompanying monitoring and protection initiatives.

The Bureau also observed that the government report asserted that the protection of upstream spawning grounds aligns with Georgia's Development Strategy - Vision 2030, and that there is progress towards establishing the 'Rioni Managed Reserve'. However, the complainant's report indicated a recent study of wild caught sturgeon being exploited to support captive aquaculture programs and commercial sales. The Bureau requested further elaboration on this matter.

Referring back to an earlier Respondent Report of 2022, the Georgian Authorities made reference to an agreement for the construction of a fish-pass at the Vartsikhe dam. The Bureau requested for further information and update on this initiative.

It was also noted that several HPPs already create barriers, preventing the upstream migration of sturgeon. The Bureau requested that further elaboration be offered by the complainant and respondent to articulate how the upstream construction of the Namakhvani project could affect the habitat and success of existing sturgeon spawning areas and what water management considerations, other mitigations and protections would be put in place to safeguard the species and habitat affected.

The Bureau acknowledged the difference of account regarding the opportunity for public participation in the development of the strategy and requests further information, while encouraging efforts to facilitate public engagement. The Bureau encouraged the Georgian authorities to liaise with the public, civil society and NGOs to ensure an exchange and understanding of expressed concerns.

The Bureau noted that court procedures on the Environmental Decision N2-191 remain ongoing. The Bureau also noted the dispute filed by Enka Renewables against the Republic of Georgia at the International Chamber of Commerce. For both cases, the Bureau would welcome an update and the implications for the future of the HPP project.

The Bureau welcomed and appreciated the concerns and response of both complainant and respondent on issues pertaining to the Rioni River HPP project. Given the project remains pending, the Bureau requested to be sent an update.

Both parties were requested to provide updated reports for the Bureau meeting in Autumn 2025.

The complaint remains on stand-by.

➤ 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, providing an account of the current activities in and around the mines.

The Bureau noted that according to the Respondent no significant irregularities were observed near the mines in Bosilegrad. However, it expressed concern that allegedly the impact on species and habitats of the existing mine and its potential extension, including the risks of environmental accidents, weren't adequately evaluated, i.a. due to incomplete EIA, unsatisfactory wastewater treatment methods and water pollution monitoring. The Bureau reiterated its request for further information on these matters and suggested both regular and additional, ad hoc inspections without prior notice.

The Bureau appreciated the cooperation with the Bulgarian authorities, which the Bureau encouraged the authorities to pursue. It requested to be informed of the results of the transboundary EIA and the related public consultations, noting the worrying initial conclusions shared by the Complainants, allegedly evoking a risk of transboundary heavy pollution of water.

The Bureau acknowledged that beyond geological research of gold and accompanying metals no permit for gold exploitation has been granted in the vicinity of Mt Homolje. It noted however that according to the Complainant night drilling and using water from the local water bodies, negatively influencing protected species, was ongoing in the area. The Bureau also noted that the risk of polluting several rivers, with a strong negative impact on people, species and habitats, including on the Nature Park Kučaj – Beljanica (Emerald site), was evaluated as considerable.

The Bureau expressed concern over the Complainants' reporting further threats to activists and journalists in the region and obstruction of public participation and access to information by the Serbian Government.

The Bureau again urged the authorities to reject possible proposals for resuming and expanding mining activities in fragile natural environments, stressing that in 2025 the Bern Convention Secretariat proposed to organise an event on minimising the negative impact of mining on biodiversity, aimed at sharing of expertise and providing assistance to the parties. The Bureau encouraged the Respondents to attend the event.

The Bureau requested the Secretariat to continue liaising with the Espoo Convention, the European Commission and the Energy Community Treaty to exchange information on their parallel processes.

In view of the already stated negative impact and allegedly high risk of further severe, transboundary consequences of the mining, from exploration, to extraction, to processing activities, the Bureau decided to **elevate the complaint to the status of a possible file** and requested both parties to make a brief presentation at the 44th Standing Committee meeting.

➤ 2023/3: Switzerland: New wolf culling policy

Decision: The Bureau thanked both parties for their update reports, the data on the population, the principles and results of the culling so far and the information on the protective measures and requirements in place.

The Bureau took note of the procedure in place for the cantons to apply for culling permits at the federal level and reiterated that only serious damage could give ground to an exception foreseen by the Article 8 and expressed concern that "potential damage" constituted a misinterpretation of the Article 8 of the Bern Convention. It stressed that proactive culling applied to discrete packs could not be considered as culling only applied to wolves when other measures were exhausted.

Noting that the authorities considered the current status of the wolf population satisfactory despite the number of packs remaining unchanged, the Bureau remained concerned with the potential extent of wolf culling and the arbitrary minimum number of packs as low as 12, with the possible cumulative effect of the politically motivated, proactive, so preventive, and reactive regulation, leading to a large-scale culling.

The Bureau expressed concern about reported inaccurate controls of damages caused by wolves and alleged manipulation of data for the purpose of justifying further culling.

The Bureau noted the ongoing CHWOLF's complaint to the Federal Administrative Court was pending, while other complaints filed by international organisations were rejected due to the division of

responsibility between FOEN and the cantons. It stressed that ensuring compliance with the Bern Convention remained on the federal level, regardless of the internal organisation within a signatory State.

The complaint is elevated to **a possible file**. Both parties were invited to make a brief presentation at the 44th Standing Committee meeting

7.4. New (pending) complaints

- 2022/08: Serbia: Possible negative impact of mining activities in Mountain Baba

Decision: The Bureau thanked both parties for their reports.

It acknowledged the government's submission of information regarding the approval status for all relevant sites, including four mines, along with data on environmental protection measures. Additionally, the Bureau appreciated the complainant's clarification that the location of Mountain Baba was defined based on the Spatial Plan of the Municipality of Paraćin.

The Bureau requested that the complainant provide explicit, scientifically based clarification on the impacts to biodiversity, the environment, and nature conservation, which fall under the mandate of the Bern Convention, in its next report, so that the Bureau can carry out a meaningful study of the file, otherwise it may have to consider closing it.

The Bureau called on the government to specify under what conditions a national spatial plan can override a local one within the Serbian legal framework. If applicable, to clarify apparent contradictions with the Spatial Plan of the Municipality of Paraćin (please see quotations from the Complainant report).

The Bureau requested the government to provide a detailed update in its next report on the decision regarding the Lešje mine, particularly following the appeal made by the operating company. This update should include any implications arising from the appeal.

Furthermore, the Bureau requested updates on the results of both routine and non-routine inspections for all four mines, specifically whether air quality and other checks conducted between 2023-2025—especially at the Krajnji Rid mine—have yielded positive outcomes, as this information was not clearly presented in the government's report.

The Bureau also noted issues regarding access to documents providing historical context on the necessity of the mining projects, specifically the studies conducted in the 1980s concerning the Plana mine. It stressed that these documents must be shared with the local community and made publicly available online.

Moreover, the Bureau emphasised the importance of a proactive and regular engagement with local residents. It encouraged the government to continue holding regular meetings to keep the community informed and ensure that their concerns are effectively addressed (including the allegation of pollution by silicon dust). Such engagement could include site visits, public hearings, or making relevant documentation—such as inspection reports, blasting logs, or other pertinent records—available on publicly accessible websites. Any follow-up documents or meeting reports illustrating these efforts would be welcomed as annexes to the next progress report.

The Bureau stressed that in 2025 the Bern Convention is expected to organise a workshop on minimising the negative impact of mining on biodiversity and encouraged the parties involved in this case to attend it.

Both parties were requested to provide updated reports for the Bureau meeting in Summer 2025.

The complaint is considered on stand-by.

- 2023/1: 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 remained concerned over the plans for the Skavica Hydropower plant (HPP) on the Black Drin River and its effects upon protected species listed within the Convention's annexes and resolutions.

The Bureau was concerned to hear that the previous support for the protection of this species by the Albanian authorities may be undermined by the impacts of this HPP project and a perceived decline in the Balkan Lynx Recovery Programme.

The Bureau welcomed the progress that has been made to appoint appropriate resource and expertise to produce the studies and assessments required to support the submission of the ESIA. It is noted that the Albanian authorities indicate that the consideration of the expected impacts on biodiversity are included within the legislative requirements for the EIA and SEA. Given these efforts and safeguards, it is hoped that the pending reports will consider these concerns and impacts effectively.

The Bureau observed that consultation of the public and civil society has not yet taken place, despite the Constitutional Court view that there should be appropriate provision of information, consultation, and engagement with public and civil society interests. The Albanian authorities stated that a series of activities were planned with the objective of involving interested parties or the wider public and were expected to be carried out in the first six months of 2024. The Bureau noted that the Respondent Report indicated that the National Environmental Authority (NEA) is defined as the competent authority to ensure that the public is informed, consulted and practically involved, but activities and opportunities to meet and engage with interest groups or local authorities on the project have not yet taken place. The Bureau anticipated and encouraged meaningful public examination and consultation on the project that will include access and participation for all interested parties and the public.

As the ESIA has not yet been made available, no proposed mitigations or measures have been put forward in response to the concerns for the protected species in the area. Similarly, the previously stated wider concerns over the status and welfare of the region, the impact of the HPP project on candidate Emerald Network sites and other western Balkan lakes remained open questions for consideration. The Bureau therefore requested to be informed on the follow-up given to this.

Given the clear biodiversity impacts and threat to protected species, the Bureau urged the Albanian authorities to observe the precautionary principle and for alternatives to be considered. The Bureau requested that all foreseeable mitigation options are considered and assessed. The Bureau would also welcome clarity on the height of the dam as this will determine the impact on the area that will be affected, as well as greater detail on the alleged impact on candidate Emerald Network sites.

It was also noted that the Albanian authorities have specifically indicated that environmental concerns were necessarily considered and balanced with the socio-economic welfare and development of the country, whereby development would be sustainable and would not compromise biodiversity or ecological integrity and that such considerations would be overseen at the highest level. Given the Albanian Government's awareness of the concerns raised, the Bureau hoped that all interested parties appreciated that these matters remained current and that rigorous, careful and public examination of these concerns would be forthcoming in the near future.

Both parties were requested to provide updated reports for the Bureau meeting in Summer 2025. In the event of earlier developments, both parties were requested to notify the Bureau and to submit updates for the Spring 2025 Bureau meeting.

The complaint is considered on stand-by.

- 2023/2: Switzerland: Alleged damage to protected habitats and species due to logging activities in the Belpau Emerald Network site (CH0000028)

Decision: The Bureau thanked the Government for its report and took note of the latest submission from the complainant dated May 2024.

The Bureau observed that the Government's report provided detailed data, offering a broader context for the allegations of intensive logging activities. It also noted the thorough information regarding the existence and functioning of the management plan for the site, which appeared to align with the national objectives set forth by Switzerland.

The report confirmed that the site is protected under stringent Swiss regulations, including provisions for biotopes of national importance and forest reserves. It highlighted that the alluvial forests on the left bank of the Aar are said to have lost their natural river dynamics and that the Government considered the revitalisation of this ancient alluvial forest to be essential.

However, the Bureau observed a discrepancy regarding deadwood operations, which were reportedly identified in 2021 and acknowledged by the Government in their report but seem to be continuing, as referenced in the complainant's more recent report.

The Bureau also sought information on the percentage of habitat trees being preserved on this Emerald site, noting the importance of maintaining a minimum level to ensure a healthy environment for the surrounding fauna. It also considered that clear-cutting operations are typically preceded by inventory assessments and requested that the Government demonstrate that best practices, on this matter, are being followed on this site.

Further clarification was requested on the impact of logging activities on rivers and the associated biodiversity, particularly in relation to thermal regulation methods increasingly used to combat the decline of oxygen levels in rivers, which harms aquatic species. Planting trees along riverbanks provides shade, reduces water temperature, and helps restore oxygen levels, thereby creating a healthier aquatic environment, especially for species sensitive to rising temperatures.

The Bureau took note of the four planned measures to improve site management and monitoring (page 6 of the Government's report). It also requested details on the indicative timeline for the adoption, implementation, and evaluation of these measures, as well as the inclusion of relevant data in the Government's next report.

The Bureau requested that the Government suspend any further logging expansion until all relevant studies are completed.

Additionally, the Bureau encouraged the Government to enhance its communication and information efforts with local communities. This could include public meetings, guided tours with authorities, and providing access to relevant documentation online. Such measures would help ensure that the concerns of local residents are addressed and that they are fully informed about the project's implications.

Both parties were requested to provide updated reports for the Bureau meeting in Autumn 2025.

The complaint is considered on stand-by.

7.5. Follow-up of previous recommendations and case-files

- [Recommendation No. 68 \(1998\)](#) on the protection of the common hamster (*Cricetus cricetus*) in Alsace (France)

Decision: The Bureau thanked both parties for their reports.

It felt particularly concerned by the fact that despite the national action plans for more than 20 years and the European programmes, the number of wild populations of common hamsters (*Cricetus cricetus*) in Alsace is critical. It therefore asked the French authorities whether the impact of these action plans and programmes had been evaluated, to explain why they didn't seem to be efficient and what measures were taken to improve the situation.

The Bureau was also concerned by the fact that despite agreements signed, the authorities paid farmers for compensation only mid-2024. It requested the authorities to study, on an individual basis, the consequences of these late payments in order to find solutions for those farmers which, as a consequence, refused to renew their agreements for 2024. The Bureau also stressed that the policy should be attractive and easy enough to implement so that farmers participate in the plans.

While it took note of the meetings organised with representatives of farmers and local authorities to present and discuss specific aspects of the protection and conservation of the common hamster, the Bureau invited the authorities to organise information and awareness campaigns targeting farmers, in general, all local authorities and the public at large.

With a view to increase the protection of the common hamster, the Bureau called on the French authorities to pursue the efforts to increase the number of collective zones distributed within the static protection zones (ZPSs) and support zones (ZAs), in particular in Haut-Rhin.

The Bureau requested to be informed on the expectations, the size of the zones concerned, the number of contracts with farmers to be achieved and any other relevant information relating to the objectives to be reached in the coming years.

Finally, the Bureau was alarmed that despite an increase in the number of burrows immediately after hamster releases, the number of burrows recorded decreased in the following years without releases. It understood this as a clear sign that the areas concerned were not sufficiently adapted for the survival of the released hamsters and/or that the animals were not necessarily fit enough to be released into the wild. It therefore called on the authorities to step up the actions taken to ensure that the areas where the hamsters are released are conducive to the survival of the species and an increase in its numbers.

The Bureau requested both parties to submit a detailed update on the situation focusing on the issues above and the follow-up given to the various recommendations contained in [Recommendation No. 68 \(1998\)](#) for its meeting in Summer 2025.

7.6. New complaint form received

The Secretariat informed the Bureau of two new complaint forms submitted, which are scheduled for discussion in next year's Bureau meetings.

Decision: The Bureau took note of the information.

8. ANY OTHER BUSINESS

The NGO Grassland Hungary Life requested an action plan for the endangered European ground squirrel, present in several eastern and central European countries. While important, such a plan requires significant work and resources. Existing working groups within the Bern Convention system do not cover this species nor small mammals, when other organisations such as the IUCN have an expert group on small mammals.

Decision: The Bureau requested the Secretariat to consult with IUCN and follow up accordingly.

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 to the Summit of the Heads of State and Government of the Council of Europe on 16-17 May 2023 in Reykjavík, Iceland

3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION

3.1. Draft Protocol amending the Bern Convention – state of play

3.2. Voluntary contributions received in 2023 and 2024: state of play

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

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

3.4. Working Group on overseeing implementation of the Strategic Plan

[T-PVS/Agenda(2024)12 – Agenda of the second meeting of the Working Group on overseeing implementation of the Strategic Plan]

[T-PVS(2024)06 - Strategic plan indicators - results of working group consultation April-May 2024, and next steps]

[T-PVS/Inf(2024)12REV - Voluntary national updates on Strategic Plan implementation – draft questionnaire]

4. IMPLEMENTATION OF THE PROGRAMME OF ACTIVITIES AND BUDGET FOR 2024

[Calendar of meetings 2024]

[T-PVS(2023)21 - Programme of Activities and budget for 2024]

4.1. Emerald Network

[T-PVS/Agenda(2024)PA11 – Draft recommendation on further clarification of the obligations of Contracting Parties regarding the conservation of Emerald Network sites]

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

[T-PVS/Agenda(2024)16 – Agenda of the 6th meeting of the Ad hoc Working Group on Reporting]

4.3. Group of Experts on the Conservation of Birds and IKB

4.4. Large Carnivores

4.5. Action Plan for the eradication of the Ruddy Duck in Europe: state of play

4.6. Pan-European Action Plan for the conservation of Sturgeons

5. 44TH STANDING COMMITTEE MEETING

5.1. Draft Agenda

[T-PVS/Agenda(2024)13 – Preliminary draft agenda]

5.2. Programme of Activities 2025-2026

[T-PVS(2024)09 – Preliminary draft programme of Activities and budget for 2025]

6. MONITORING OF THE IMPLEMENTATION OF THE LEGAL ASPECTS OF THE CONVENTION (BIENNIAL REPORTING AND ONLINE REPORTING SYSTEM)

7. IMPLEMENTATION OF THE CONVENTION: CASE-FILES

*[T-PVS/Notes(2024)01 – Summary of open and possible case files]
[T-PVS/Notes(2024)02– Summary of complaints on stand-by]
[T-PVS/Notes(2024)03– Summary of new & pending complaints]
[T-PVS/Inf(2024)01 – Register of Bern Convention's case-files]*

7.1. Open files

- 1986/08: Greece: [Recommendation No. 9 \(1987\)](#) on the protection of Caretta Caretta in Laganas bay, Zakynthos
*[T-PVS/Files(2024)50– Government Report]
[T-PVS/Files(2024)51– Complainant Report]*
- 1995/06: Cyprus: Akamas peninsula
*[T-PVS/Files(2024)XX – Government Report]
[T-PVS/Files(2024)48 – Complainant Report]*
- 2010/05: Greece: Threats to marine turtles in Thines Kiparissias
*[T-PVS/Files(2024)46 – Government Report]
[T-PVS/Files(2024)47 – Complainant Report]*
- 2012/09: Türkiye: Presumed degradation of nesting beaches in Fethiye and Patara SPAs
*[T-PVS/Files(2024)69 - Government Report]
[T-PVS/Files(2024)49 - Complainant Report]*
- 2013/01: North Macedonia: Hydro power development within the territory of Mavrovo National Park
*[T-PVS/Files(2024)62 - Government Report]
[T-PVS/Files(2024)61 - Complainant Report]*
- 2016/04: Montenegro: Development of a commercial project in Skadar Lake National Park and candidate Emerald site
*[T-PVS/Files(2024)55 - Government Report]
[T-PVS/Files(2024)XX - Complainant Report]*
- 2016/05: Albania: Presumed negative impact of developments on the Vjosa river including hydro-power plant and Vlora International Airport
*[T-PVS/Files(2024)13 - Government Report]
[T-PVS/Files(2024)14 - Complainant Report]*
- 2017/02: North Macedonia: Alleged negative impacts to Lake Ohrid and Galichica National Park candidate Emerald Sites due to infrastructure developments
*[T-PVS/Files(2024)9 - Government Report]
[T-PVS/Files(2024)10 - Complainant Report]*
- 2019/05: Türkiye: Habitat destruction in Mersin Anamur Beach – *on the spot appraisal (OSA)*
*[T-PVS/Files(2024)31 - Government Report]
[T-PVS/Files(2024)6 - Complainant Report]
[T-PVS/Files(2024)58 - Terms of Reference of the OSA]*
- 2020/09: Bosnia and Herzegovina: Possible negative impact of hydro-power plant development on the Neretva River
*[T-PVS/Files(2024)07 - Government Report]
[T-PVS/Files(2024)21 - Complainant Report]*

7.2. Possible files

- 2001/04: Bulgaria: Motorway through the Kresna Gorge
*[T-PVS/Files(2024)34 - Government Report]
[T-PVS/Files(2024)35 - Complainant Report]*

- 2020/04: Armenia: The Amulsar gold mine project and its impacts on Emerald Network sites
[T-PVS/Files(2024)15 - Government Report]
[T-PVS/Files(2024)16 - Complainant Report]
- 2022/03: Norway: Wolf culling policy
[T-PVS/Files(2024)41 - Government Report]
[T-PVS/Files(2024)63 - Complainant Report]

7.3. Complaints on stand-by

- 2017/06: Iceland: Possible negative impact on Breiðafjörður Nature Reserve's authentic birch woods from new road infrastructure
[T-PVS/Files(2024)42 - Government Report]
[T-PVS/Files(2024)73 - Complainant Report]
- 2018/01: Ukraine: Presumed threat to Emerald site "Polonina Borzhava" (UA0000263) from wind energy development
[T-PVS/Files(2024)59 - Government Report]
[T-PVS/Files(2024)71 - 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(2024)60 - Government Report]
[T-PVS/Files(2024)72 - Complainant Report]
- 2019/04: United Kingdom: Badger Culling Policy in England
[T-PVS/Files(2024)53- Complainant Report]
- 2021/07: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley
[T-PVS/Files(2024)57- Government Report]
[T-PVS/Files(2024)54- Complainant Report]
- 2021/08: Georgia: Possible threat to Rioni River from the Namakhvani Hydropower Project
[T-PVS/Files(2024)64 – Government Report]
[T-PVS/Files(2024)65 – Complainant report]
- 2022/06: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region
[T-PVS/Files(2024)22 - Government Report]
[T-PVS/Files(2024)23 - Complainant Report]
- 2023/03: Switzerland: New wolf culling policy
[T-PVS/Files(2024)68 - Government Report]
[T-PVS/Files(2024)70 - Complainant Report]

7.4. New (pending) complaints

- 2022/08: Serbia: Possible negative impact of mining activities in Mountain Baba
[T-PVS/Files(2024)44– Government Report]
[T-PVS/Files(2024)45– Complaint Report]
- 2023/01: Albania: Alleged habitat destruction due to the construction of the Skavica Hydropower Plant on the Drin River
[T-PVS/Files(2024)08 - Government Report]
[T-PVS/Files(2024)66 – Complaint Report]

- 2023/02: Switzerland: Alleged damage to protected habitats and species due to logging activities in the Belpau Emerald Network site (CH0000028)

*[T-PVS/Files(2024)56 - Government Report
[T-PVS/Files(2024)38 - Complainant Report]*

7.5. Follow-up of previous recommendations and case-files

- [Recommendation No. 68 \(1998\)](#) on protection of the common hamster (*Cricetus cricetus*) in Alsace (France)

*[T-PVS/Files(2024)52 - Government Report]
[T-PVS/Files(2024)40 – Complainant form]*

7.6. New complaint form received

8. ANY OTHER BUSINESS

Appendix II – List of participants

CHAIR

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

VICE-CHAIR

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

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Mr Mikaël POUTIERS, Secretary of the Bern Convention

Ms Marta MEDLINSKA, Administrator, Bern Convention

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Mr Michaël NGUYEN, Administrative and Project officer of the Bern Convention

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