



Strasbourg, 17 October 2025

T-PVS(2025)16

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**  
45<sup>th</sup> meeting

**Bureau meeting**

16<sup>th</sup>-18<sup>th</sup> September 2025  
(Strasbourg)

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**- MEETING REPORT -**

## 1. OPENING OF THE MEETING & ADOPTION OF THE AGENDA

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### 1.1. Adoption of the agenda

The Chair opened the meeting and presented the draft agenda to the Bureau members, thereafter, requesting its formal adoption.

The Secretary requested a change to the agenda, proposing to swap item 4.4 with item 4.5.

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

## 2. REPORT FROM THE SECRETARIAT

### 2.1. Staff announcements

The Secretary informed the Bureau members about the staff situation and provided an update on various positions. She reported that a staff member has been on long-term sick leave with no replacement since April 2025. She also mentioned the hiring of a new temporary staff member for the period of September to December 2025. Additionally, she informed that a staff member had been on sick leave in July and, for health reasons, will continue to work remotely from his home country until 31/10. Finally, she announced the imminent launch of a new call for seconded staff members for a position starting in January 2026 within the Secretariat of the Bern Convention.

**Decision:** Bureau members took note of the information provided and acknowledged the existing human resource constraints.

## 3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION

### 3.1. Voluntary contributions received in 2025: state of play and use of resources

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

The Secretariat informed the Bureau of the progress of voluntary contributions received since the beginning of 2025.

The Secretariat informed the Bureau that voluntary contributions as of September 2025 have reached €78,000, showing a notable increase from €56,700 in September 2024. The number of contributors has risen from six to seven, with new potential contributors such as Burkina Faso expressing promising interest. Efforts to increase contributions have included official letters sent in January and April and bilateral meetings held by the Chair with focal points from Greece, Sweden, Iceland, and Spain to encourage voluntary support.

Pending contributions now stand at €160,000, significantly higher than last year's €56,000 if all materialise. Significant individual contributions from countries such as Monaco and the Netherlands have positively impacted these totals. The Secretariat emphasised the importance of sustained efforts to maintain and increase voluntary funding.

A broader historical perspective was presented, showing a peak in contributions and contributors in 2020-2022, followed by a downturn starting in 2023. The number of contributors dropped from 22 in 2022 to 14 in 2024, indicating the need for vigilance and proactive engagement to sustain momentum.

The Chair presented the exchange held with the focal points from Greece, Sweden, Iceland and Spain and highlighted the financial constraints that are experienced at the national level to fund environment-related activities. He recognised the value of these meetings and emphasised the need to continue this approach and follow up on the exchanges.

Finally, it was noted that the activity report originally planned for a single year has been postponed to next year and will become a biennial report for 2024-2025.

**Decision:** Bureau members took note of the information provided and requested that the Secretariat continue monitoring the situation and maintain contact with potential contributors.

### **3.2. Working Group on exploring mechanisms to guide amendments to the appendices of the Bern Convention**

The Secretariat informed the Bureau of the outcomes of the second meeting of the Working Group on mechanisms to guide amendments to the Appendices of the Bern Convention, held on 4 September. The Secretariat underlined the importance of analysing the various options in light of their broader context, as well as their potential administrative and financial implications, including the costs associated with the IUCN option, or the tasks that would be assigned to an Advisory Group.

The Bureau discussed the proposals made by the Working Group, noting that the amendment of Recommendation No. 56 (1997) (Option A) is a prerequisite for commissioning *ad hoc* expert advice (Option C).

The Bureau acknowledged that IUCN, through its work with UNESCO on the World Heritage Committee and the Man and the Biosphere Reserve Programme, as well as with other multilateral environmental agreements, has extensive experience, notably via the Species Survival Commission and the Red List of Threatened Species. It was recalled that IUCN is widely recognised in this field, although it does not cover all aspects of the Bern Convention, and that the Bureau has an important role to play in the process.

The Bureau also stressed the need to distinguish clearly between the processes of adding, moving and deleting species from the Appendices.

**Decision:** The Bureau took note of the outcomes of the second meeting of the Working Group on mechanisms to guide amendments to the Appendices of the Bern Convention and agreed to place this item on the agenda of the 45<sup>th</sup> meeting of the Standing Committee.

The Bureau requested the Secretariat to update the information document to reflect the withdrawal of Option B and highlight the complementarity of Options A and C. It was agreed that Option D should remain only as a fallback. The Bureau also proposed that the Secretariat consults with the Chair of the Working Group in the coming weeks to define the modalities of a potential partnership with IUCN.

### **3.3. Working Group on sustainable financing options**

Following the 1<sup>st</sup> meeting of the Working Group on sustainable financing options (9 September, online), the Secretariat presented the issues discussed during the meeting (VCs, BO, Trust Fund) and the four strategic options currently under discussion as a follow-up to this meeting:

#### **1. Partial Agreement**

This was seen as a possible financing solution, involving mandatory contributions to ensure independence from the Council of Europe's general budget. However, legal and technical challenges remain, including the need to extend the agreement's scope beyond the Bern Convention, potentially by integrating the European Landscape Convention.

#### **2. Trust Fund**

The proposed voluntary Trust Fund would offer flexible financing and multi-year stability. However, it remains vulnerable to economic fluctuations and has been suspended due to lack of political consensus, following the 134<sup>th</sup> session of the Committee of Ministers in Luxembourg.

### 3. Conference of the Parties (CoP)

The Conference of the Parties (COP) provides an official platform where Parties come together to adopt financial principles and guidelines, to be approved by the Committee of Ministers. This promotes political clarity and greater visibility regarding financial responsibilities. The aim would be to produce a clear text reflecting the defined principles and obligations, which will then be submitted to the Committee of Ministers for adoption. The COP will therefore be able to establish a set of reference standards and rules, laying the foundations for a structured and progressive system of contributions.

### 4. Continuation of the Amending Protocol

The Secretariat informed the participants of the opinion prepared by the Directorate of Legal Advice and Public International Law (DLAPIL) and the Directorate of Programme and Budget (DPB) of the Council of Europe, which indicated that the 3<sup>rd</sup> version of the Draft Protocol amending the Bern Convention ([T-PVS\(2023\)13](#)) does not fully comply with the internal regulations of the Council of Europe. A new version of the Draft Protocol was drafted to align it with the legal and budgetary frameworks of the Council of Europe ([T-PVS\(2024\)10](#)). Adjustments were requested, notably concerning Article 19 (majority vs unanimity) to ensure better compliance and clarity.

No option has been definitively chosen. The group will continue its exploratory work, and all four options will be presented to the Standing Committee for further consideration.

**Decision:** The Bureau took note of the outcomes of the first meeting of the Working Group on exploring sustainable financing options for the Berne Convention and agreed to present the four options proposed to the next meeting of the Standing Committee. It also requested the Secretariat to hold a meeting with EU representatives to clarify any pending issues in relation to the Draft Protocol.

### 3.4. Working Group on overseeing implementation of the Strategic Plan

The Secretary provided an update on the work carried out under the Strategic Plan. She reported that the independent expert, David Pritchard, has delivered the outline and content list for the Monitoring and Evaluation Guide of the Strategic Plan. He reviewed the questionnaire designed to collect voluntary national updates from Contracting Parties on the implementation of the Strategic Plan and proposed a timeframe for its distribution. Due to reduced human resources, the questionnaire has not yet been sent out, and the Secretariat is currently considering possible next steps in coordination with the Chair of the Group, Jan Plesnik. The Secretary also informed that the meeting of the Working Group overseeing the implementation of the Strategic Plan, originally scheduled for 14 October, may be postponed.

**Decision:** The Bureau took note of the information provided.

### 3.5. Thematic Groups of Experts and Working Groups under the Bern Convention: state of play

*[T-PVS/Inf(2025)30 - Overview of the thematic group of experts and working groups set up under the Bern convention]*

The Secretariat introduced a document providing an overview of the thematic Groups of Experts and Working Groups established under the Convention. This reflection on their functioning and effectiveness was prompted by the request of the Group of Experts on Large Carnivores to clarify its mandate and composition, as well as by feedback from several focal points highlighting the need to

make these groups more effective and useful. The Secretariat noted that several aspects are currently under consideration, including:

- Membership
- Duration
- Mandate
- Frequency of meetings
- Expected results

The Secretariat also presented several possible solutions to enhance the effectiveness of these groups, such as adopting comprehensive Terms of Reference for each group, regulating the Groups' functioning in the draft revised Rules of Procedure and identifying priority areas on which the Groups of Experts should focus.

The Chair stressed the importance of this item and highlighted the need to reform the functioning of these Groups, as suggested by several focal points during informal meetings. The Bureau discussed possible next steps regarding these groups. Some members underlined the added value of these groups, noting that their expert-based approach is a strength and a particularity of the Bern Convention, in contrast with more politically oriented processes.

**Decision:** The Bureau took note of the information provided and thanked the Secretariat for preparing the overview of the Groups of Experts and Working Groups established under the Convention. It highlighted the need to enhance the efficiency of these groups' work.

The Bureau agreed to establish clear Terms of Reference, including rules on membership, frequency of meeting and duration of mandate, and tasked the Secretariat with presenting a consolidated picture, based on this overview, to the Standing Committee at its 45th meeting.

### 3.6. Rules of procedure of the Standing Committee and Working Groups

The Bureau was recalled that the Secretariat listed in March 2024 the following elements to be considered for possible inclusion in a revised version of the Rules of Procedure:

- clarifications on the written procedure;
- reference to possible extra-ordinary meetings of the Standing Committee with consequences such as the fact that there should be no need to proceed with elections of the Chair, vice-chair and Bureau members and to admit again observers;
- possibility to revoke the status of observer if it is seen that an observer was inactive for a long time in the Standing Committee;
- clarification on the length of the term of office of the Chair, Vice-Chair and other members of the Bureau, for example: 2 years, renewable once as in other CoE conventions;
- consideration of [Resolution CM/Res\(2021\)3](#) on intergovernmental committees and subordinate bodies, their terms of reference and working methods;
- any other possible issue that may appear at the time of drafting the revised Rules of Procedure.

The Secretariat presented such draft revised Rules of Procedure and explained the numerous proposed amendments:

- the order of paragraphs has been reorganised to have a more logical flow;
- provisions which concern procedures but included in the Bern Convention itself have been added to the revised Rules of Procedures, systematically introduced by a reference to the precise Article and paragraph of the Convention where they come from. The Secretariat stated that these changes were proposed to have all procedural texts in one document but highlighted that these texts cannot be changed since they come directly from the Convention;
- other changes have been made to improve the text and follow-up on the decisions taken in March 2024.

**Decision:** The Bureau thanked the Secretariat for the impressive work on the draft revised Rules of Procedure. Due to the extent of changes, it decided to dedicate an extraordinary meeting on Monday 20 October 2025 to study the revised text more carefully. Following this meeting, a new version of the draft revised Rules of Procedure will be prepared and circulated to the Council of Europe's Legal Advice Department to ensure compliance with Council of Europe standards. An information item on the draft revised Rules of Procedure will be included in the agenda of the 45th Standing Committee. The work is expected to be finalized in 2026, with a possible adoption during the 46th meeting of the Standing Committee.

#### **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]*

The Secretary provided an update on the overall level of implementation of the 2025 programme of activities. She explained that most activities had been successfully completed, although some delays were noted concerning the expert meeting on the eradication of the Ruddy Duck and the implementation of the Strategic Plan. Additionally, the meeting of the ad hoc Working Group on the conservation of marine turtles was postponed, as it was deemed a low priority by the Standing Committee.

##### **4.1. Meeting of the Group of Experts on Protected Areas and Ecological Networks**

The Secretary informed the Bureau of the organisation of the 15<sup>th</sup> Meeting of the Group of Experts on Protected Areas and Ecological Networks (7-8 October 2025, Bar - Montenegro).

The agenda of the meeting includes the following points:

- Updated information on monitoring the implementation of the Vision and Strategic Plan of the Bern Convention for the period to 2030 ;
- Criteria for assessing (negative) changes on the Emerald Network dataflow ;
- New fields of the draft proposal of the Emerald Network Standard Data Form based on the discussion paper on implications ;
- Reportnet 3 delivery platform: state of play;
- Assistance on fulfilling countries factsheets of the Emerald Network: Overview of errors in the dataflow; the need to update country databases ;
- Emerald Network: screening, prior assessment and authorisation of potentially harmful projects. A digest of relevant international legal instruments, recommendations and guidelines ;
- Development of the Emerald Network in Contracting Parties: state of play (Tour de table);
- Emerald Network in Montenegro;
- Programme of activities 2025 – 2026.

**Decision:** The Bureau took note of the information provided on the preparation of the meeting and its content.

##### **4.2. 8th Meeting of the Ad hoc Working Group (AH WG) on Reporting and training course on reporting for non-EU contracting parties**

The 8<sup>th</sup> Meeting of the Ad hoc Working Group on reporting and the training course on reporting for non-EU countries will take place in Copenhagen (Denmark) respectively on 19 and 20 November 2025. The meeting and the training course will take place in the facilities of the European Environmental Agency (EEA), which will cooperate in the development of both sessions, along with independent experts and with the support of a private company (TRACASA).

The Meeting of the AH WG and the training course has been launched already, and we are currently receiving inscriptions, different for both sessions, as the training is addressed exclusively to non-EU countries.

Preliminary main contents in the agenda of the AH WG on reporting are:

- Contribution of the reporting to the indicators of the Strategic Plan of the Bern Convention;
- Conclusions from the workshop on FRV, habitat condition and future prospects;
- Reference tables, schemas and validation rules for Resolution No. 8 (2012) reporting 2019-2024;
- State of development of the Resolution No. 8 (2012) Portal in Reportnet 3;
- Lessons learnt from the previous reporting exercise (2013-2018);
- Reporting Reference Portal;
- Data Delivery Manual ;
- Range tool.

Training course: work off-line (based on prepared templates for habitats and species) and on-line

- Validations: error types and correction of data;
- Release to data collection ;
- Questions & answers session.

**Decision:** The Bureau took note of the information provided.

### 4.3. Update on the European Diploma for Protected Areas (EDPA)

*[T-PVS/DE(2025)07\_Report of the Meeting of the Group of Specialists 2025]*

*[T-PVS/DE(2025)08\_Report of the Roundtable of Managers EDPA]*

The Secretariat informed the Bureau of new developments since its second meeting (18-19 June 2025).

Firstly, the Bureau was informed that the Committee of Ministers had renewed the European Diploma for Protected Areas of the Gallipoli Cognato Regional Park (Italy) for a further ten years and had awarded the Diploma to the Sierra Nevada National Park, Natural Park and Biosphere Reserve (Spain). The Diploma award ceremony will take place in Florence, on the sidelines of the informal ministerial meeting celebrating the 25th anniversary of the Landscape Convention, on 28 October 2025.

Secondly, a letter from the Chair of the Standing Committee was sent on 21 July 2025 to the Bern Convention focal points, requesting applications to join the Group of Specialists on the European Diploma for Protected Areas (currently composed of only four members). Several applications were received and reviewed by the Bureau.

**Decision:** The Bureau thanked the various authorities for the applications sent. It decided to reappoint Mr Jan Plesnik (Czech Republic) to the Group of Specialists on the European Diploma for Protected Areas for a period of 4 years (until December 2029). It also appointed Mr Simon Klingler (Austria), Mr Antonios Barnias (Greece), Ms Simone Remund (Switzerland) and Ms Oya Bumin (Türkiye) for a period of 4 years (until December 2029). It also decided to place Ms Ioulia Drouga (Greece) on a reserve list to replace Mr Barnias in the event that the latter leaves office before the end of his term of office (the new composition of the Group of Specialists on the European Diploma for Protected Areas appears in Appendix III).

### 4.4. Follow-up to the joint meeting with the CMS MIKT on IKB and Group of Experts on the Conservation of Birds

*[T-PVS(2025)09 Report of the Joint meeting on IKB of CMS MIKT and Bern Convention]*

*[T-PVS(2025)10 Meeting Report of the Group of Experts on the Conservation of Birds]*

The Bureau was informed of actions following up from the Joint Meeting on IKB and the meeting of the Group of Experts (GoE) on the conservation of wild birds.

### Illegal Killing of Birds

A draft survey on motivations for IKB was prepared, with the pilot phase ongoing. The geographical scope covers Mediterranean countries, Serbia and Türkiye. Resources permitting, the Bern Convention could finance a geographical extension of the study in 2026.

Mid-term evaluation of the Rome Strategic Plan to be launched in 2025 has advanced well, draft Terms of Reference of the evaluation were circulated for comments. The Scoreboard 2023 data and information collected in tailor-made interviews are meant to be used for the purpose of the evaluation.

In 2026, a new Scoreboard data collection will be launched.

### **GoE Wild Birds**

The Bureau was invited to comment on the further revised version of the paper on minimising the impact of developing renewable energy infrastructure (windfarms, solar energy) on birds, to which comments were previously collected from the Bern Convention Group of Experts on the Conservation of Wild Birds, CMS Energy Taskforce, BirdLife International etc. A further revised draft is to be ready by the end of October 2025.

The following four thematic sub-groups worked at the occasion of the GpoE meeting last May:

- Light pollution
- Pesticides and other chemical substances
- Lead
- Small carnivores on small islands

The sub-groups on pesticides and other chemical substances, and on lead merged.

Each sub-group proposed issues to be further addressed, which may be formulated as concrete deliverables (recommendations or practical guidance documents). In principle a follow-up meeting of the Group to prioritise the topics was envisaged but put on hold due to heavy workload of the Secretariat and in view of reflection on the future of the thematic groups of experts. The Bureau member and President of the Group of Experts recommended focusing on pesticides and other chemical pollution as priority, in view of the huge scale of the harm caused by those to birds. Also, the mandate of the GoE is to be revised accordingly, at least in coordination with the Chair.

**Decision:** The Bureau took note of the information provided and expressed hope that adequate resources could be allocated to the survey on motivations for IKB in 2026. It tasked the Secretariat with preparing Terms of Reference of the Group of Experts on Birds with a priority deliverable focused on tackling the very significant negative impact of pesticides and other chemical substances on wild birds, before following up on the other topics. The revised draft paper on minimising the negative impact of renewable energies on birds is to be finalised, possibly with the involvement of the Group of Experts, and presented to the Standing Committee for information.

### **4.5. Follow-up to the meeting of the Group of Experts on Large Carnivores**

*[T-PVS(2025)11 Meeting Report of the Group of Experts on Large Carnivores]*

Following up on the outcomes of the Group of Experts' meeting in June 2025, the Secretariat consulted the President on:

- questions of membership, terms of reference (ToR), rules of procedure consistent across all the thematic Groups of Experts to the extent possible,
- topics proposed by the Group for its further work (including understanding of the favourable conservation status (FCS) and its implications),
- the mandate to monitor the status of wolf populations following the species downlisting.

On 30 September 2025 a follow-up online meeting of the Group is meant to give an opportunity to further discuss the ToR and prioritise possible deliverables for the period until 2027.

The draft ToR, in particular the deliverables formulated by the Secretariat in consultation with the President of the Group, were presented to the Bureau. The deliverables due in 2025 stemmed directly from the task given to the Group by the Standing Committee at its meeting in December 2024. The



proposed survey on possible legal and administrative changes resulting from the downlisting of the wolf is to be discussed at the follow-up online meeting of the Group on 30 September 2025. The conclusions would then be submitted to the Bureau for consideration at its extraordinary meeting on 20 October 2025, before being shared with the Parties.

From among the existing Recommendations on large carnivores some are to be archived, some remain relevant, others may need updating, which could be done by the Group, wherever need – in collaboration with independent experts. Identified gaps may then be closed by proposing new recommendations, e.g. on managing bold individuals.

The revised draft of *Best practices for management of protected and strictly protected populations of large carnivores in Europe*, now incl. lynx and wolverine, was then evoked, to seek further feedback and a decision on the way of bringing it to the Standing Committee's attention at its meeting in December 2025.

The Bureau was also informed of the state of play with the conservation strategies:

- Balkan lynx – advancing very well, comments collected over the summer were being incorporated into the draft strategy with the involvement of the Carpathian Convention and IUCN/SSC Cat Specialist Group. The Bern Convention would contribute to an event “Saving the Balkan Lynx – Insights into Conservation Efforts” to be held at the European Parliament on 24 September 2025 to raise visibility of the urgency of the issue.
- Carpathian lynx – the necessary assessments were being completed, the strategy is less urgent but also less advanced, deadline for its finalisation would probably be extended.

**Decision:** The Bureau took note of the information provided and gave feedback on the draft Terms of Reference of the Group of Experts on Large Carnivores. It stressed that the role of the Groups of Experts was to inform the Standing Committee and its Bureau of most relevant developments in their respective domains, which required no voting. The Group should facilitate understanding of the local to international realm, while formulating specific deliverables should help streamline the work and foster efficiency. Experts on large carnivores nominated by the Parties should constitute the Group, while Observers may also be present. Working methods, possibly combining in-person and online meetings, work in sub-groups, inviting external experts etc. remain to be decided and kept flexible, so that they best correspond to possibilities and needs.

The Bureau tasked the Secretariat with finalising the provisional ToR in consultation with the Group of Experts on large carnivores, stressing that the deliverables were very ambitious. The document, with its new structure, could then serve as an example for other thematic groups of experts.

The draft survey on eventual legal and administrative changes resulting from the downlisting of the wolf shall be consulted with the Bureau and – in due time – brought to the attention of the Committee.

The Bureau had no further feedback on the revised draft of *Best practices for management of protected and strictly protected populations of large carnivores in Europe*. The document, still to be reviewed by the Group at its meeting on 30 September, is to be submitted for the Standing Committee's information ahead of its meeting in December 2025.

#### 4.6. Follow-up to the meeting of the Group of Experts on Amphibians and Reptiles

[T-PVS(2025)08 Meeting Report of the Group of Experts on Amphibians and Reptiles]

The Bureau was informed of the proposals for future work of the Group that suggests to:

- enhance promoting Important Herpetofauna Areas at European level (following up on the results of a survey in 2023),
- continue sharing good practice in protecting amphibians and reptiles (controlling the spread of Bsal; traps of roads, railways, sewage system, climate change),
- reinforce the collaboration with the GoE IASs for a better fight against alien pathogens and pathogens spread by IAS and on e-commerce and IAS,
- hold a meeting of the GoE in person.

A joint meeting with the Group of Experts on IASs is to be held on 7 October 2025.

**Decision:** The Bureau took note of the information provided and will await the outcomes of the joint meeting of the Group with the Group of Experts on Invasive Alien Species (IASs), to be held on 7 October.

#### 4.7. Follow-up to the meeting of the Group of Experts on Invasive Alien Species

*[T-PVS(2025)07 Meeting Report of the Group of Experts on Invasive Alien Species]*

The Bureau took note of the Group appreciating meeting after a long break, stressing swift developments concerning IASs, not least on the side of the European Commission's expert group, and the importance of close collaboration and extending the efforts of controlling IASs to non-EU countries. Since the Spring meeting of the Group, when its members identified important topics in what concerns IASs, the following were prioritised through an online poll:

1. The increasing problem of the trade of exotic species and their conversion into IAS (already treated by the Group).
2. The issue of biocontrol agents as a potential source of new IAS.
3. The problem of biomass waste material as a way of spreading IAS.
4. The need for greater attention to be given to the marine biome and freshwater environments in relation to IAS.

Other priority **actions** include:

1. The need for meetings (online or in person) to be conducted on a bi-annual basis to maintain the momentum of the Group's work.
2. The potential need for existing documents on IAS to be updated.
3. The need to promote involvement of non-EU countries in the meetings of the Group.
4. The proposal to extend the membership of the Group and closely collaborate with similar groups of experts.

The Group will hold a short online exchange right after the joint meeting with the Group of Experts on Amphibians and Reptiles, to decide on possible deliverable(s) and a corresponding timeline to be included in revised Terms of Reference and proposed to the Standing Committee in December 2025.

**Decision:** The Bureau took note of the information provided and will await the outcomes of the follow-up meeting of the Group and its joint meeting with the Group of Experts on Amphibians and Reptiles on 7 October. The reform of the thematic groups of experts should facilitate reinforcement of their activities and the corresponding deliverables should find way to the work plan of the Bern Convention, resources permitting.

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

The Secretariat reminded the Bureau that the current Action Plan for the eradication of the Ruddy Duck in Europe ends at the end of 2025 and that the Group of Experts on the Ruddy Duck should have prepared a report on the implementation of the 2021–2025 Action Plan on Eradication of the Ruddy Duck and drafted a new Action Plan.

The Secretariat informed the Bureau that it was unfortunately not in a position to work on the file in 2025 due to several cumulative reasons, in particular the long term sickness of the consultant who worked on this file and his inability to prepare the relevant documents, the difficulties to organise his replacement by another expert, and staff shortages in the Secretariat of the Bern Convention due to sick leaves and late replacement of the Secretary of the Convention.

The Secretariat highlighted that solutions should be found in order to avoid having no framework in the action plan for the Eradication of the Ruddy Duck.

**Decision:** The Bureau decided to invite the Standing Committee to extend the current Action Plan for the Eradication of the Ruddy Duck by one year to allow time to prepare a report on the implementation of the 2021–25 Action Plan and – subject to the availability of financial and human resources - to draft a new Action Plan in time for the 46th Standing Committee meeting in December 2026.

#### 4.9. Activities on the negative impact of mining on biodiversity

The Secretariat informed that an online meeting with Serbian authorities took place on 5 September, involving high-level representatives from several ministries and agencies. The discussions focused on environmental concerns related to lithium mining in the Jadar River Valley (2021), mining impacts in Bosilegrad and the Homolje Mountain region (2022), and quarrying effects in Mountain Baba (2022). The aim was to address these concerns constructively and facilitate dialogue among government bodies, complainants, and stakeholders.

Envisaged follow-up actions included an in-person round-table and site visit, a report with recommendations, an international workshop and a study on reducing mining impacts on biodiversity, with involvement of an independent international expert, and ongoing expert engagement.

Some additional information on the EIA and SEA at the sites concerned was presented by the relevant service. While the Secretariat asked to receive the information in writing, the Bern Convention Focal Point offered providing it as a part of future update reports on the casefiles.

The Secretary expressed satisfaction with the meeting and cooperation so far but noted that the national authorities did not take a clear position on possible next steps such as the in person round table.

**Decision:** The Bureau took note of the information provided and thanked the Secretariat for organising this online meeting, praising the good will of the Serbian authorities to participate in it. The Bureau expressed interest in further information on the Environmental Impact Assessment procedures, presented orally at the meeting by the relevant colleagues, and asked the Secretariat to convene an online meeting with the complainants and inform the Serbian authorities of its request to organise an in-person round table to discuss the different issues at stake.

## 5. 45TH STANDING COMMITTEE MEETING

### 5.1. Draft Agenda

*[T-PVS/Agenda(2025)21 – Preliminary draft agenda]*

The Secretariat presented the draft agenda for the 45<sup>th</sup> Standing Committee meeting, highlighting the most relevant points and outstanding questions. It explained that the draft agenda largely reflected the content of the Bureau's agenda. The Secretariat also drew attention to the Council of Europe's evolving strategic framework.

Regarding the Interim Progress Review Report, the Secretariat informed Bureau members that it is required to report on the number of States that have amended their policies, legislation, and practices in line with the Bern Convention during the 2024–2025 biennium, as part of the implementation reporting for the Council of Europe's Programme and Budget 2024–2027. The Secretariat indicated its intention to use the Standing Committee meeting to gather this information and announced that Contracting Parties will be requested to prepare their input one month prior to the meeting.

**Decision:** The Bureau asked to include an information item on the current revision of the Rules of Procedure in the agenda of the 45<sup>th</sup> meeting of the Standing Committee. He also requested to organise an extraordinary Bureau meeting to discuss the draft revised Rules of procedure in more detail. The

Bureau and the Secretariat convened to hold this meeting online on 20 October 2025. They also agreed that some other items may be added to the draft agenda of this extraordinary meeting.

## 5.2. Programme of activities 2026

*[T-PVS(2025)12 – Preliminary draft programme of Activities and budget for 2026]*

The Secretariat introduced the Programme of activities and budget of the Bern Convention for 2026, which consisted of a narrative section and a budgetary part. This version took into account the ongoing activities and the necessary follow-up, without yet incorporating any revisions that the Bureau or Standing Committee might propose regarding the Working Groups and Groups of Experts, or the thematic priorities for the upcoming period. Further adjustments were expected to be necessary to align with the decisions made at the meeting. The Secretariat presented the items highlighted in orange as possible priorities. Given the fluctuations in human resources and the uncertainty about the level of resources available for the following year, the Secretariat highlighted the need to remain flexible and to identify priority areas.

**Decision:** The Bureau took note of the proposal made by the Secretariat and requested some adjustments. It proposed reviewing the Programme of activities for 2026 at the next extraordinary Bureau meeting on 20 October.

## 6. MONITORING OF THE IMPLEMENTATION OF THE LEGAL ASPECTS OF THE CONVENTION (Biennial reporting and Online Reporting System)

### 6.1. Online Reporting System: update

The Secretariat provided an update on the state of play for the transition to the upgraded Online Reporting System (ORS). Transition to the new ORS is planned for this Autumn to be completed by 31 December 2025. Funding of the costs of the transition activities and ongoing maintenance and service costs will be divided between Voluntary and Ordinary budgets. Further detail was provided to explain the deliverables within the transition activities, governed by the onboarding plan from the supplier (WCMC - World Conservation Monitoring Centre). This would include the creation and integration of the new reporting questionnaire, technical set up, data migration, training and capacity building, including the onboarding and orientation of the Secretariat for using new ORS and administrator and user guides. Consequently, we would look forward to launching the reporting cycle in January 2026.

## 7. IMPLEMENTATION OF THE CONVENTION: CASE-FILES

*[T-PVS/Notes(2025)05 – Summary of open and possible case files]  
[T-PVS/Notes(2025)06– Summary of complaints on stand-by]  
[T-PVS/Notes(2025)07– Summary of new & pending complaints]  
[T-PVS/Inf(2025)17– Register of Bern Convention’s case-files]*

### 7.1. Options to improve the Complaint System: exchange of views with an expert

The Secretariat made an introduction on the strategic framework for the possible revision of the case-file system by referring to the recently adopted CoE Strategy and Action Plan for the Environment. It stressed the need to make the system more effective without creating additional workload for the Secretariat.

The international expert on litigation and arbitration, Zannis Mavrogordato, presented the current challenges of the case-file system and proposed some ways to improve the system in regard to the different steps of the procedure, the admissibility phase, the procedural phase and the possible closing

phase. The exchange of views with the expert addressed several issues, such as the source of information used for the decisions, the impact of the case-files system.

**Decision:** The Bureau welcomed this discussion and agreed that there is a clear need to reform the case-files system. The Bureau proposed continuing to explore possible venues to improve the system and decided to rediscuss this point at the Bureau meeting in April 2026 further to the preparation of an information document by the expert and the Secretariat.

## 7.2. Open files

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

[\[T-PVS/Files\(2025\)1986-08\\_gov](#) - Government Report]

[\[T-PVS/Files\(2025\)1986-08\\_comp](#) - Complainant Report]

**Decision:** The Bureau:

Thanked both parties for their reports, and welcomed the improvements reported by the authorities.

Welcomed that both parties agreed to and participated in the On-the-Spot Appraisal (OSA), which took place on 17-18 June 2025, back-to-back with another OSA at Thines Kiparissias.

Welcomed the local Management Unit's assent to the Environmental Impact Assessment on the restoration of the Zakynthos landfill at Skopos and expects the works to start soon.

Was informed that despite initial refusal from the Greek authorities, the visit to Marathonisi island was conducted in the framework of the OSA. The Bureau expressed its satisfaction that the National Natural Environment and Climate Change Agency (NECCA) has undertaken a series of immediate and coordinated actions concerning the construction activities on Marathonisi Island under a 2022 building permit, leading to a suspension order (Reference No. 792/2025) by the Zakynthos Building Authority.

Welcomed the improvements detected during the OSA on the management measures for some of the six protected nesting beaches visited, such as increased cordoning of the nesting areas at the back of all the beaches, more and new signs, and warden presence.

Remained concerned with the illegal constructions and illegal businesses in Dafni, the additional touristic facilities in the area and the progressive erosion of the beach. 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 where necessary, and restoration of the beach and its surroundings.

Was concerned about insufficient night surveillance - in the absence of wardens after sunset there were people visiting the nesting beaches after the beach closure hours.

Noted with concern that several breaches of [Recommendation No. 9 \(1987\)](#) of the Standing Committee on the protection of *Caretta caretta* in Laganas bay, Zakynthos, were observed during the OSA, namely: 1) violation of the rules and regulations on controlling marine traffic and sea turtle spotting by tourists; 2) extremely high marine traffic with no enforcement of the speed limits in the bay. Furthermore, there is an apparent increase in the number of boats approaching sea turtles for touristic, posing risks of mobbing and stressing the animals. These violations are facilitated by an insufficient surveillance by the Port Authority in summertime.

Noted with concern the excessive use of fireworks and strobing lights from local nightclubs in the wider area of East Laganas, capable of illuminating the entire nesting area and interfering with the turtle nesting all along the breeding season.

Was informed that due to long-term sick-leave of the international expert involved in the OSA after his return from the mission, the OSA report and the resulting recommendations cannot be finalised in a foreseeable future, in particular not in time for the Standing Committee in December 2025.

In view of the exceptional circumstances, which prevented fulfilment of the requirements of the mission in due course, proposed to the Standing Committee to repeat the OSAs for both case files 2010/05 and 1986/08 in 2026, with the participation of another international expert, one or two Bureau members and a member of the Secretariat, in close collaboration with the Greek authorities and the complainants.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 2010/05: Greece: Threats to marine turtles in Thines Kiparissias - *on-the-spot appraisal (OSA)*

[\[T-PVS/Files\(2025\)2010-05\\_gov - Government Report\]](#)

[\[T-PVS/Files\(2025\)2010-05\\_comp - Complainant Report\]](#)

**Decision:** The Bureau:

Thanked both parties for their reports, and welcomed the improvements reported by the authorities;

Welcomed that both parties agreed to and participated in the On-the-Spot Appraisal (OSA), which took place on 19-20 June 2025, back-to-back with another OSA at Laganas Bay, Zakynthos;

Was informed that the National Natural Environment and Climate Change Agency (NECCA) is in the process of contracting the following works:

- Construction of wooden fencing to protect priority dune habitats (habitat types 2270\* & 2250\*) across approximately 3 km;
- Placement of twenty new ecological and behavioural awareness signs;
- Installation of wooden bollards at sensitive points to restrict vehicle entry;
- Sand dune stabilisation, invasive species removal, and placement of wooden boardwalks.

Welcomed the steady increase in the number of nests stated in the 2025 reports from the parties and congratulated both the NGOs working in the field during the nesting season and the NECCA for this successful result.

Expressed concern that the adoption of the Management Plan has been delayed for over six years and urged the Greek authorities to adopt and enforce it.

Regretted that during the OSA, the visit to Vounaki was not possible, impeding the evaluation of the impact of the watermelon cultivation and the ownership of the land and sand dunes affected by the activity, despite the relevant recommendation n° 5, included in [Recommendation No. 174 \(2014\)](#) on the conservation of the loggerhead sea turtle and of sand dunes and other coastal habitats in Southern Kyparissia bay, which specifically refers to agriculture activities in that area.

Regretted that it was not possible to determine the limits between the coastal public zone on the beach and the private zone behind the public land in Kiparissias.

Regretted that it was difficult to discuss the surveillance system and the enforcement of legislation in Kiparissias due to the lack of participation from the various administrations responsible for enforcing environmental regulations, such as the Port Authority, Fishing Authority, Building Authority, Forest Authority, etc.

Expressed concern that the OSAs at Kiparissias lasted less than one day, which was considered insufficient.

Was informed that due to long-term sick-leave of the international expert involved in the OSA after his return from the mission, the OSA report and the resulting recommendations cannot be finalised in a foreseeable future, in particular not in time for the Standing Committee in December 2025.

In view of the exceptional circumstances, which prevented fulfilment of the requirements of the mission in due course, proposed to the Standing Committee to repeat the OSAs for both the case files 2010/05 and 1986/08 in 2026, with the participation of another international expert, one or two Bureau members and a member of the Secretariat, in close collaboration with the Greek authorities and the complainants.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 1995/06: Cyprus: Akamas peninsula

*[Government Report Not Received]  
[[T-PVS/Files\(2025\)1995-06\\_comp](#) - Complainant Report]*

**Decision:** The Bureau:

Thanked the Complainants for their report and regretted the lack of report from the government, noting that the last report from the respondent was submitted in December 2024. Urged the parties to fulfil their complaint-related reporting obligations.

Was concerned that Cyprus made no progress in implementing [Recommendation 191 \(2016\)](#), nor in declaring Akamas Peninsula as a National Park, or an equivalent protection category.

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

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.

Welcomed the information on the enforcement measures at the nesting beaches in the marine protected area, which were adequately patrolled and controlled by agents of authority. Expressed hope that the number of agents of authority would increase to cover adequately the whole of the beaches in the rest of Akamas peninsula.

Regretted that the Sustainable Development Plan for the Akamas peninsula include activities and developments, like upgrades of the road network, which are already having a significant negative 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).

Was concerned that some of the protection measures preventing vehicle access, which were in place in the beaches, have been removed, leaving the nesting sites more exposed during summertime.

Expressed its concern 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.

Was concerned 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.

Requested that the Secretariat liaise with the Cypriot authorities to convene a multistakeholder meeting with the complainants - among others - to facilitate dialogue between the parties and decisive advances in the resolution of this case file.

Due to the lack of information provided, the authorities were requested to send a report with precise replies to the issues raised by the Bureau above, in due time before the 45<sup>th</sup> Standing Committee meeting.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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]

**Decision:** The Bureau:

Thanked both parties for their reports.

Welcomed an increase in the number of nests in 2024 at Patara and a significant increase in hatchling emergence success.

Expressed satisfaction that the biodiversity study for the Management Plan (MP) for the Patara Special Environmental Protection Area (SEPA) has been completed and encouraged the Turkish authorities to finalise the MP.

Welcomed some managerial improvements at the Main Beach in Patara, at the mouth of the Eşen River and in the Patara and sand dune hill sections: solar-powered security cameras and limitation in access after 19:00. The old information signs have been renewed, and 50 new signs have been placed on the beach. Presentations are regularly held at some guesthouses and hotels, as well as at the information office located on the beach.

Welcomed that predation is being monitored (camera traps were placed in two different areas of the beach), and main predators have been identified. The Bureau encouraged the authorities to capture and remove predators from the nesting beaches on a regular basis, using humane methods.

Appreciated that the sea turtle nesting population is subject to long-term monitoring, leading to moving 51 nests at risk to safer locations.

Welcomed that Patara SEPA has been designated as one of the pilot sites for the project RESCOM “Strengthening the Resilience of Ecosystems in the Mediterranean, by (IUCN), and a cooperation protocol has been established to prepare the Management Plan of the area.

Took note that the complainant visited the area in July 2025 and didn’t observe any changes since its previous on-site visit.

Regretted that threats persist across the area: vehicle access, horseback riding, construction overlooking the coastline, and various forms of pollution. The Patara Main Beach is accessible to the public both day and night, and Security presence is limited, with a guard intermittently patrolling near the beach furniture area. Poor beach furniture management was also observed.

Regretted that night surveillance of the beaches are carried out nearly exclusively by volunteer teams which report to the authorities.

Was deeply concerned that, although repeated violations of the recommendation are identified and reported by the conservation authorities (sand extraction, sand filling, sand levelling, the use of heavy vehicles on the beach, installation of structures -fences, railings, sidewalks, umbrellas, pergolas, pavilions, caravans, plantation of invasive species -*Acaciae*- etc), specially at Fethiye, no effective enforcement measures are applied. This is a consequence of the attribution of competencies -especially surveillance and enforcement- between different administrations.

While recognising that some improvements have been made, it noted that these are primarily limited to the Patara main beach, while in other areas conservation issues affecting the nesting beaches remain.

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 \(2015\)](#).

Requested update reports ahead of the Standing Committee meeting in December 2025, detailing progress in relation to both Recommendations, as well as any other relevant updates.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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\]](#)

**Decision:** The Bureau:

Thanked both parties for their reports.

Expressed concern that there had been no updates concerning the proclamation of Mavrovo National Park and that the park management, including the Director, had been subject to criminal charges for organising illegal logging within the park. It urged the national authorities to proceed with updating the legal framework without delay.

Noted that the study for the valorisation of Mavrovo National Park (NP) had only been prepared in Macedonian. It recalled that, at its last meeting in April 2025, it had requested that this study be appended to the respondent's report in order to legally determine the proposed borders, zones, and their boundaries. It regretted that the study was neither attached nor described in the report and therefore requested that either the full study, or an abstract thereof, be submitted with the next report, in English, together with a description of the follow-up given to it.

Welcomed ongoing plans to amend the Law on Environment regarding Environmental Impact Assessment (EIA) and requested the authorities to ensure alignment with best international standards in this field. It regretted that there is still no ban on hydropower in protected areas under the Nature Law and the draft Water Law, contrary to what is required by international standards.

Welcomed the development of a Draft Regional Strategy for the Conservation of the Balkan Lynx, prepared in cooperation between State authorities, civil society organisations, and stakeholder groups. It acknowledged that this Strategy is currently under consultation and requested the authorities to provide the Bureau with updates on its adoption and implementation in the next report.

Noted that Eko-svest is organising an International Nature Conference in Skopje on 28 October 2025 and appreciated that national authorities would participate, creating an opportunity to reinforce cooperation between State authorities, civil society organisations, and stakeholder groups, and to discuss the implementation of [Recommendation No. 211 \(2021\)](#). Considered it relevant also for the Bern Convention Secretariat to be represented at this conference and to organise a site visit, if possible, to take advantage of the opportunity.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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\]](#)

**Decision:** The Bureau:

Thanked both Parties for their respective reports.

Noted with regret that its repeated calls to halt construction activities pending further assessments had not been followed by the government. Acknowledged the commencement of the certification process for the airport and, in this context, requested detailed information regarding the Wildlife Hazard Management Plan and the Albanian Civil Aviation Authority (ACAA) action plan in addressing the International Civil Aviation Organisation (ICAO)'s top five global risks.

Asked the government to present the measures outlined in the Environmental Impact Assessment (EIA) conducted in relation to the construction of the airport and how the government has implemented them.

Encouraged the government to conduct a study on the effect the airport operations would have on the different species of bird populations in the area.

Suggested undertaking habitat restoration in the areas surrounding the airport to offer a substitute for the birds.

Requested that the government shares the planned mitigation measures for the conservation of birds and offered advice on the elaboration of further conservation and mitigation measures related to this case-file.

Expressed concern regarding the handling of the recent rally by the National Park management team, as well as with continuing human activities in the area, such as oil extraction, gravel extraction, and water abstraction, which negatively affect the park's ecological integrity.

Urged the government to fully abide by the Vjosa National Park management plan in all related activities and phase out harmful operations on its area.

Invited the Secretariat of the Convention on the Conservation of Migratory Species (CMS) to consider signing a joint letter between the Bern Convention and the CMS, addressing the handling of the Vlora Airport Development project by the Albanian government.

Acknowledged the government's concerns about disinformation pertaining to the Himara water supply project.

Welcomed the court's decision ordering an assessment of the environmental consequences of the revised Himara water supply project by an independent expert and encouraged the stakeholders to set it up as soon as possible.

Called for strict adherence of the Himara water supply project to the International Union for Conservation of Nature (IUCN) recommendations.

Requested further information on the relevant court cases.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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]*

#### **Decision:** The Bureau:

Thanked both parties for their reports.

Took note of the complainant's argument that no progress has been made towards the implementation of the fifteen points of [Recommendation No. 221 \(2023\)](#) since its last report (February 2025). It nevertheless regretted that the authorities had not provided a detailed update on progress achieved with respect to each point of the Recommendation in their latest report.

Acknowledged that the planning conditions presented constitute only an extract from higher-level legally required planning documentation, and do not imply automatic permission for construction. It also took note of the clarifications provided regarding the authorities responsible for urbanisation and illegal constructions. Nevertheless, the Bureau reiterated its request for the Ministry of Environment to justify the issuance of these decrees on spatial planning conditions, given that [Recommendation No. 221 \(2023\)](#) calls for a moratorium on all construction.

Noted the complainant's remark that the Ministry had issued a call for the removal of illegal constructions across the entire territory of the National Park, and asked the Ministry to specify the number of constructions concerned. It further requested detailed information on actions taken with regard to illegal constructions (in particular in Studenchishte Marsh), including the administrative and criminal proceedings initiated against all co-owners of the subject plot.

Expressed concern regarding the ongoing legalisation of illegal constructions and the continued development of new illegal buildings, notably the hotel in Nova Gorica, as well as the adoption process of new urban plans for the village of Ramne within Galicica National Park. It requested the authorities to report on the compensation measures envisaged to mitigate the damage. It also asked both parties to provide information on zoning in order to identify precisely the location of the illegal constructions and to obtain a clear understanding of the species and habitats affected.

Noted the information provided by the complainant concerning the proposed amendment to the Law on Managing the World Heritage Ohrid Region, which would reduce the number of members of the World Heritage Management Commission. The Bureau called upon national authorities to provide further information in this regard and to ensure the establishment of a professional management body for the World Heritage property, composed of members with appropriate expertise and vested in law with the powers to take and implement management decisions, as required under point 2 of [Recommendation No. 221 \(2023\)](#).

Noted that Eko-svest is organising an International Nature Conference in Skopje on 28 October 2025 and strongly encouraged national authorities to participate, in order to reinforce cooperation between State authorities, civil society organisations, and stakeholder groups, and to discuss the implementation of [Recommendation No. 221 \(2023\)](#). It considered that the Bern Convention Secretariat should also be represented at this conference.

Reiterated the decision of the 44<sup>th</sup> Standing Committee (December 2024), which underlined the urgent need for national authorities to fully implement each point of [Recommendation No. 221 \(2023\)](#) falling under their responsibility, in order to secure tangible improvements on the ground at local level. The Bureau also emphasised the importance of strengthened cooperation between central government and municipal authorities.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the 45<sup>th</sup> Standing Committee meeting, focusing on the issues above.

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

[\[T-PVS/Files\(2025\)2016-04\\_gov - Government Report\]](#)  
[\[T-PVS/Files\(2025\)2016-04\\_comp - Complainant Report\]](#)

**Decision:** The Bureau:

Thanked both parties for their reports.

Noted the complainant's argument that no progress has been made by the Montenegrin authorities regarding implementation of [Recommendation No. 201 \(2018\)](#).

Noted that the new spatial plan for Montenegro was adopted in June 2025. However, it regretted that the Revision Study of the Protected Area has not been adopted, nor have the Special Purpose Spatial Plan for Skadar Lake National Park and the related spatial planning documents. Also, expressed concern that the Draft Special Purpose Spatial Plan does not address all points of the Recommendation.

Urged the Montenegrin authorities to proceed with the adoption of the Revision Study, which is considered a preliminary step towards adopting several other key instruments, and the Special Purpose Spatial Plan for Skadar Lake National Park whose content should comply with the requirements set out in [Recommendation No. 201 \(2018\)](#).

Requested the national authorities to clarify the status of building permits for Porto Skadar Lake and White Village and its capacity to enforce national law within the territory of the Park.

Welcomed Montenegro's agreement to host the forthcoming meeting of the Group of Experts on Protected Areas and Ecological Networks, including a visit to Skadar Lake, and its offer to host a biogeographical evaluation seminar.

Requested the Montenegrin authorities to use these opportunities to advance the implementation of the Recommendation in cooperation with national NGOs.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues outlined above with particular emphasis on the aspects observed during the visit to Skadar Lake.

- 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\]](#)

**Decision:** The Bureau:

Thanked both parties for their reports.

Appreciated the efforts of the regional and local authorities and the university to advance in implementing the Recommendation No. 226 (2024) of the Standing Committee concerning Mersin Anamur Beach.

Invited the relevant authorities to continue the efforts to prevent light pollution, illegal sand extraction, illegal vehicle entry, businesses expansion to the beach and other disturbances, and to reinstate *Trionyx triunguis* habitats, especially on Dragon river and Sultan Stream.

Stressed the importance of implementing the actions foreseen for after the nesting season and ensuring that relevant controls of the beach and *Trionyx triunguis* habitats take place also in the winter period.

Requested information on planned high-rise constructions behind the Karaağaç section, on caravan camping on the beach near Dragon River and development of tourist infrastructure on the coast of the Anemurion Ancient City.

Requested further information on the undertakings of the commission established under the Governorship of Anamur, the monitoring group and the team dealing with data collection.

Requested that the respondent provide a timetable and concrete plan by which to progress with coordination, and a plan for the implementation of [Recommendation No. 226 \(2024\)](#) and coordination with all relevant parties.

Thanked the complainant for highlighting that the beach section between Mamure Castle and the Dragon River was a potential nesting core area due to the intensity of nesting activity and invited the authorities to consider this appropriately.

Invited both the authorities and the complainants to cooperate towards effective implementation of [Recommendation No. 226 \(2024\)](#) and consider the complainants' requests to: remove the concrete floor in front of the Teacher's Guest House; release more water from the Hydroelectric Power Plant in Dragon Stream to ensure sedimentation flow; dismiss the zoning plan change in the Aquapark region affecting the nesting beach, approved by the Municipality of the Anamur and the Mersin Metropolitan Municipality; study damage to the streams from existing and possible mines in the region and agricultural pollutants in the environment in view of mass fish deaths occur at various times in these streams, which are home to African soft shell turtle; reconsider the municipality's stream improvement and cleaning efforts, to avoid negative effects on the aquatic life in the streams.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the 45<sup>th</sup> Standing Committee meeting, focusing on the issues above.

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

*[Government Report Not Received]*  
*[T-PVS/Files(2025)2020-09\_comp - Complainant Report]*

**Decision:** The Bureau:

Thanked the complainant for their report and noted that the respondent did not offer an update report.

Further noted that no further progress is indicated by the complainant on the implementation of [Recommendation No. 217 \(2022\)](#) since the 44<sup>th</sup> Standing Committee.

Underlined the previous statements by the Bureau and Standing Committee, in that it is understood that the HPP Ulog reservoir was finalised and the reservoir filled, but opportunities and responsibilities remain to explore and undertake measures for the preservation and conservation of habitats and species in the process of the construction and function of the Ulog HPP.

Noted that no objection impedes the holding of a coordination meeting between parties.

Requested that the respondent provide a timetable and concrete plan by which to progress with coordination, and a plan for the implementation of [Recommendation No. 217 \(2022\)](#) and coordination with all relevant parties.

Requested that the respondent provide a concrete answer for the Standing Committee in December 2025.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 2022/03: Norway: Wolf culling policy

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

**Decision:** The Bureau:

Thanked both parties for their reports.

Expressed strong concern regarding the conservation status of the South Scandinavian wolf population in view of its high genetic vulnerability, the plans to maintain the Norwegian population very small and to significantly decrease the population in Sweden, signalled by the complainants.

Urged the government to reconsider the wolf culling policy, which the Bureau considers incompatible with the obligation to ensure a satisfactory population level and thus in breach of the Bern Convention, and requested the Secretariat to swiftly prepare a meeting between the Norwegian authorities, the complainants and the Bureau, with involvement of experts in the domains of large carnivores conservation and management as well as international law. Associating the Swedish authorities should also be considered.

Recommended further efforts to decrease the very high inbreeding coefficient in wolf packs in Norway, with enhanced possibilities for new, genetically significant individuals to migrate and be well protected.

Expressed concern over possible implications of a recent amendment of the Nature Diversity Act allowing so-called emergency culling where “it is highly probable that an attack (on grazing animals) is imminent”. Asked for further information about the change and recommended putting in place safeguards, to mitigate the risk of abuse of the new provisions.

Took note of the requests of the Complainants, in particular to investigate the issue of Favourable Reference Population, in cooperation with the representatives of Sweden and the EU, and to ensure that the conditions for the favourable conservation status of the wolf in Sweden and Norway are met.

Stressed the role of the Group of Experts on large carnivores in considering possible solutions, including developing a common understanding of certain aspects concerning management of transboundary populations of large carnivores between EU and non-EU Member States and involving the Chair of the Group in relevant discussions.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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]

**Decision:** The Bureau:

Thanked both parties for their reports.

Considered the information on the current status of the wolf population and the culling permissions in the period 2024-25, noting that it exceeded threefold the minimum threshold of 12 packs despite removing up to over 1/3 of the total population to prevent damage to livestock was foreseen.

Asked for information on the genetic diversity of the wolf population in addition to the numbers of packs, pairs and individuals, to be able to better assess the status of the population.

Noted the Swiss authorities' declaration that the legal protection status of the wolf was meant to remain unchanged, as well as the complainants' concern that *de facto* wolf has become a huntable species, with culling for the reasons of cost and capacity delegated to non-professional hunters.

Expressed concern that competencies of those hunters may prove insufficient, causing harm to other species, such as lynx, listed in the Bern Convention Appendix III, and requested information on the training required to be involved in the regulation.

Requested further information on the techniques of regulation, some of which seemed to require biennial reporting on the exceptions from the application of the Bern Convention provisions.

Appreciated the allocation of considerable funds to herd protection and requested information on their attribution to lethal and non-lethal measures, encouraging reinforcement of the latter, which had a proven record of diminishing the damage.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

### 7.3. Possible files

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

[\[T-PVS/Files\(2025\)2001-04\\_comp\\_gov](#) – Government/Complainant Joint Report]

**Decision:** The Bureau:

Thanked both parties for their joint report and welcomed their efforts to continue working together to find a solution to the case file.

Welcomed a series of positive developments that support the implementation of [Recommendation 212 \(2021\)](#) and the decision of the 44<sup>th</sup> Committee of the Convention.

Noted that an expert group was set up to monitor the implementation of the roadmap and has already met three times with positive outcomes. The Bureau requested that the meeting reports of this expert group be appended to future reports submitted by the parties.

Highlighted the adoption and announcement of a new public procurement procedure in June 2025 with a view to building a transport route from Simitli to Kresna (North-South) outside of the gorge and, in



the vicinity of and parallel to the route of the Kulata – Sofia direction (South-North), to the maximum possible extent. The Bureau noted that the contractor is required to prepare the EIA and AA documentation, including the Terms of Reference (ToR) for the scope and content of the environmental impact assessment, an environmental impact assessment report, a non-technical summary and a report assessing the extent of the impact on protected areas. The Bureau stressed, however, that studies and documentation must be qualitative and reliable, and that the time constraints described in the report must not prejudice this.

Noted that the Road Infrastructure Agency presented the project to implement mitigation measures to reduce the mortality of species on the existing I-1 road in the Kresna Gorge to the complainant. The adaptation of existing culverts, the installation of fencing facilities, and the construction of three new defragmentation facilities were discussed. The Bureau however noted that the NGO representatives and the herpetologists insist that all reptile fencing facilities should be removed from the measures. The Bureau stressed that an agreement on this aspect is indispensable. It noted from the report that given the current intense traffic in the gorge, the implementation of the measures is impossible, as it will further complicate the heavy traffic during the summer season. It is not clear, however, whether the intention is to implement the measures as early as autumn 2025 or whether the authorities consider that these measures should only be implemented when the bypass roads outside the gorge are open to traffic in both directions, which would result in an unacceptably long delay. The Bureau requested clarification on this issue.

It was noted that all court cases had been closed following agreements signed on 19 May 2025 by the Road Infrastructure Agency, the Ministry of Environment and Water, and the NGOs, whereby the NGOs agreed to withdraw all their complaints from the administrative courts and the Government committed to making more detailed efforts to implement [Recommendation 212 \(2021\)](#) and the decision of the 44<sup>th</sup> Committee of the Convention. The Bureau requested that the NGOs inform it of any concerns arising in relation to the full implementation of [Recommendation 212 \(2021\)](#) and the decision of the 44<sup>th</sup> Committee of the Convention.

Was concerned that harassment of NGO activists initiated by private entities continued with updates to the billboard installed in 2024 in immediate vicinity of the international road in the Kresna Gorge area as well as through numerous media publications, and that the Government considered that it cannot act against such a campaign, even though it distanced itself from it. The Bureau recalled that according to the Aarhus Convention, to which Bulgaria is a party, “Each Party shall ensure that persons exercising their rights in conformity with the provisions of this Convention shall not be penalised, persecuted or harassed in any way for their involvement” (Article 3, para. 8). It therefore called on the authorities to take action to put an end to the situation described.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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\]](#)

**Decision:** The Bureau thanked both parties for their reports.

Regarding the Amulsar gold mine the Bureau:

Took note about the validity and non-revocability of the permits granted to the company in charge of opening the gold mine before the end of 2025 and the governmental guarantees for the mine; asked about the state of play of the lawsuit filed by an Armenian civil society organisation against the guarantees.

Expressed strong concern about the preparatory work in progress, asked for more information about it and the state of play of the field study carried out by the Armenian Academy of Science to assess the recent biodiversity findings in the area of Amulsar.

Asked for information stemming from Environmental Impact Assessment (EIA) about measures to mitigate and compensate for negative impact of the prospective mine on all the species and habitats present in the area.

Regarding the revision process of the Emerald Network in Armenia the Bureau:

Reiterated its support for the civil society involvement in the consultations regarding the revision of the Emerald Network and invited the authorities to allow for scientific discussions and to respond to the comments submitted by NGOs, including the complainant.

Expressed concern with the proposed 31,5% reduction of the Emerald Network in Armenia, including removal of the totality of the Amulsar mountain from the list of the sites and asked about compensatory measures that could be proposed if such a change is made.

Regarding the Jermuk National Park the Bureau:

Commended the intention of the Ministry of Environment to continue technical studies and multilateral consultations throughout 2025, including broader public discussions and ecological zoning work, with the aim of submitting a formal proposal for park designation in 2026.

Requested further information on this process and the expected outcome, inviting the authorities to ensure the biodiversity preservation is adequately considered in the planning and coordination of the geographical and ecological overlap between the proposed national park and the Amulsar site.

Considered proposing the organisation of an On-the-Spot Appraisal visit to Amulsar in 2027, preceded by suitable preparations.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

- 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\]](#)

**Decision:** The Bureau thanked the government and the complainants for their reports.

In relation to Bosilegrad, the Bureau:

Took note of the rejection by the Technical Commission of the draft EIA study for the exploitation of lead, zinc and copper ore deposits at the Podvirovi-Karamanica mine.

Requested information on the results 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 concerning the reconstruction of the Podvirovi-Karamanica mine and additional exploitation of the deposits.

Requested information on the state of play with the recultivation of the area of the mine.

Appreciated that the Ministry of Nature Protection did not allow the activities planned by the “Bosil Metal I.L.C.” within the ecologically significant area of the Ecological Network Golemi Vrh (95) and internationally important bird area Dukat.

Noted that while the results of the water quality analysis referred to by the authorities respected the relevant emission limits, the complainants repeatedly referred to continued local waterways pollution; requested information about the alleged pollution by heavy metals, the measures in place to prevent/minimise it and called for an inspection to minimise the environmental impact of waste and tailings.

Called on the authorities to engage with complainants and all the key stakeholders and affected communities regarding the impact of mining in the Bosilegrad region and requested information on the legal proceedings against environmental activists related to this casefile.



In relation to Homolje, the Bureau:

Acknowledged that geological exploration licence for exploration for gold, copper and associated metals at Potaj Cuka site at the Municipality of Zagubica was granted, but no water-related permits in relation to that site have been issued; expressed a concern with this situation, as the drilling reportedly continued.

Asked for further details of the Institute for Nature Conservation decision of 10 June 2025 on amending conditions on nature protection for the exploration of gold and other associated metal deposits at the Potaj Cuka site at the Municipality of Zagubica, where no request for a mining permit has been requested nor granted.

Expressed concern with the allegedly increased levels of heavy metals downstream of the mine and slurry storage on Coka Rakita and asked the authorities for further information about those.

Urged the authorities to ensure appropriated inspections and enforcement, so as to effectively address identified shortcomings such as use of chemicals that negatively impact aquatic plants and fish, illegal water extraction or interrupting the flow of local water courses.

Proposed organising an On-the-Spot Appraisal at least at one of the sites, back-to-back with an in-person roundtable on minimising the negative impact of mining on biodiversity in Serbia, proposed for 2026.

Requested update reports ahead of the Standing Committee meeting in December 2025, in case further relevant developments occur.

Invited both parties to make a brief presentation at the **45<sup>th</sup> Standing Committee meeting**, focusing on the issues above.

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

[Government Report Not Received]

[[T-PVS/Files\(2025\)2022-02\\_comp](#) - Complainant Report]

**Decision:** The Bureau:

Thanked the complainant for its report and regretted the lack of report from the government. It requested that the government respects its reporting obligations on case files.

Reiterated its decision of April 2025, i.e. that:

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.

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.

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*) are the only species protected under the Bern Convention (in Appendix III, Protected fauna species), while *Lutra lutra* is 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, 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, 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, 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.

Due to the lack of information provided, the authorities were requested to send a report with precise replies to the issues raised by the Bureau above, in due time before the 45th Standing Committee meeting.

Both parties were invited to make a brief presentation at the 45th Standing Committee meeting, focusing on the issues above.

#### 7.4. Complaints on stand-by

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

[Government Report Not Received]  
[Complainant Report Not Received]

**Decision:** The Bureau:

Regretted that no report was submitted by the government or the complainant.

Postponed the consideration of the case-file to the Spring Bureau meeting of 2026.

Invited both parties to submit reports for examination during the **Spring Bureau of 2026**.

The case remained on **standby**.

- 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]

**Decision:** The Bureau:

Thanked the government and the complainants for their reports.

Took note of the alleged threats to the ecosystems in the area of Novi Sad posed by the continued development of infrastructure.

Expressed strong concern about the discrepancy between the seriousness of the allegations signalled by the complainant and the reports submitted by the authorities, paying little attention to the seemingly unassessed possible cumulative impacts on floodplain and wetland habitats, home to many protected species, as well as on groundwater provisions.

Called upon the authorities to halt the constructions until independent ecological and hydrological assessments are completed and the results of environmental impact assessment may be appropriately considered in further planning and infrastructure development.

Urged the authorities to prevent illegal activities causing harm to the local ecosystems as well as to ensure transparency and public participation in the further process.

Asked the Secretariat to liaise with the RAMSAR Secretariat in order to discuss the situation, implications of the ongoing developments and steps that may be undertaken to prevent further harm.

In view of the risk of irreversible damage to the internationally recognised ecosystem, will consider all the information provided by the parties to the Bureau in Spring 2026 to decide on possibly raising the status of the complaint.

Invited both parties to submit reports for examination during the **Spring Bureau of 2026**.

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

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

[\[T-PVS/Files\(2025\)2021-08\\_gov - Government Report\]](#)

[\[T-PVS/Files\(2025\)2021-08\\_comp - Complainant Report\]](#)

**Decision:** The Bureau:

Thanked both parties for their reports.

Noted the expressed concerns of the complainant relating to several interrelated issues in the history of the project, with the complainant citing: a lack of engagement with the contractor and state parties with stakeholders and local concerns, extending to a lack of participation in mediation opportunities; the issue of arbitration and contract termination with ENKA Renewables and the costs therein; the resumption of Hydropower projects; a potential conflict of interest with the appointment of a former Government Relations Director at Namakhvani HPP to the Head of National Environmental Agency; the alleged pressure placed upon activists and environmentalists; the procedural fairness, transparency and quality of governance of the project; the continued validity of the permits granted to the previous contractor enabling the project to proceed.

Considered that all these issues are concerns on the progress and good management of the project, and the claim that these amount to systemic environmental governance failures undermine credibility of government assurances. The respondent has indicated that these allegations do not establish how the project endangers the species cited. The respondent also has indicated that the project is not geographically present on any protected area or Emerald Network site. The complainant is asked to clearly demonstrate how these concerns will result in the alleged risk specific to the cited protected habitats and species being realised.

The complainant has also referred to the opposition of a noted specialist and their opposition to the Georgian Government's environmental practices. This does not explicitly state whether there is a communicated opinion of opposition to this particular project, and on what grounds. If there are studies that examine or quantify seismic risks and consequential ecological consequences, the complainant should refer to them directly to support their complaint.

Recalled its previous statement, welcoming 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 observed that the respondent has drafted a Rioni River Managed Reserve Law as been prepared with proposed boundaries. However, the Bureau was concerned that the proposed fishway facility at Vartsikhe HPP had not yet been constructed, and therefore the Bureau encouraged progress with such conservation initiatives. In the meantime, the Bureau would be interested to know what safeguards exist while the fish pass remains unbuilt until 2027, and how will the government address cumulative impacts of hydropower across river basins.

Observed that the respondent has also addressed the issue previously cited by the complainant in regard to the cited study of wild caught sturgeon being exploited to support captive aquaculture programmes and commercial sales. The respondent indicated that the origin of sturgeon in markets is unclear but pointed out that the illegal capture of sturgeon is a criminal offence, and no violations have been recorded since 2021, while a regime of inspection of aquaculture facilities and markets overseas compliance.

Requests that the complainant demonstrate how their concerns regarding the governance and process of the HPP project are a measurable risk to cited protected species and habitats. The complainant is asked to return their focus to the specific and measurable risks to protected species or habitats. In the continued absence of this consideration, then the case may be dismissed.

Stated that in the event of the case being dismissed, if the circumstances should develop whereby the alleged risks to protected habitats and species be substantively evidenced, the Bureau would be able to review its decision in light of that new information.

Invited both parties to submit reports for examination during the **Spring Bureau of 2026**.

The case remained on **standby**.

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

*[Government Report Not Received]*  
*[[T-PVS/Files\(2025\)2022-04\\_comp](#) - Complainant Report]*

**Decision:** The Bureau:

Thanked the complainant for their report and noted the absence of an update from the respondent.

Acknowledged the continued and communicated concerns of the complainant in regard to the EIA, where it is alleged that the process has been manipulated to maintain the inclusion of the project in the Spatial Plan, and the findings of the expert commission of the Environmental Protection Agency has been disregarded by the same Agency.

Was keen to understand why the EIA deadline was permitted to extend beyond statutory limits, and to be informed of the content of the EIA. Furthermore, the bureau requested to be better informed with concrete information on the research into the impacts of the project, and for the clarification of how NGOs and interested parties are able to be involved in the EIA process and public discussion.

Was also interested to learn of what mitigation measures are recommended or planned for by the respondent as part of this project. Additionally, the respondent is requested to report on how they are proceeding with Emerald Network development and compensatory activities.

Noted the legal efforts by the Montenegrin Ecologists Society and their appeal to the Ministry of Ecology, Spatial Planning and Northern Development. The Bureau stresses the importance for the respondent to address these concerns and asks to be informed on the impact of these irregularities.

Also expressed concern within the complainant's reporting of the accuracy of the Spatial Plan, and the inclusion of Komarnica in Energy and Climate Plan despite these stated issues.

Acknowledged the significant mobilisation of interest from NGOs and Scientific Experts, concerned with the impact of the project upon the ecology of Komarnica. The Bureau asks to be reminded by the complainant if independent peer-reviewed ecological studies have quantified the biodiversity losses.

In the absence of a report from the respondent to offer a current response to the concerns expressed by the complainant, encourages the respondent to engage and fully address the content of the complainant's report and asks the respondent to address the concerns on the quality of the EIA and the use of procedure to maintain Komarnica in the Spatial Plan and Energy and Climate Plan. In basic terms, the respondent is asked how and what mitigation might realistically address the acknowledged irreversible biodiversity impacts and why proceed with Komarnica when other viable renewable options exist – the project is viewed as part of a national renewable strategy, so the Bureau requests for detail on whether other alternatives have been evaluated in detail.

Both parties are requested to submit progress reports to the Bureau's forthcoming **Spring 2026 meeting**.

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

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

[\[T-PVS/Files\(2025\)2023-02\\_gov - Government Report\]](#)

[\[T-PVS/Files\(2025\)2023-02\\_comp - Complainant Report\]](#)

**Decision:** The Bureau:

Thanked the Government of Switzerland for submitting its report, and noted the absence of an updated formal report from the complainant, Biofuelwatch, who had nonetheless provided relevant information in December 2024. The Bureau based its assessment on these contributions as well as the Government's data.

Praised the quality and rigor of the studies conducted and the compensatory measures implemented. The forest management framework presented relied on rigorous contractual plans and targeted monitoring of species and habitats, including measures to protect vulnerable amphibians, as confirmed by a recent survey that recorded a significant local population.

Took note of the suspension of silvicultural operations during the winter of 2024 and welcomed the good practices implemented in deadwood management, which is vital to biodiversity.

Requested the authorities to finalise, formally approve and fully deploy the management plan for the site. Progress had been made in adaptive management and ecological planning, with implementation expected in the near future.

Reiterated that ultimate responsibility for Emerald Network site management rests with the State. While management tasks may be delegated to local or regional authorities, such as the Burgergemeinde of Belp in this case, the Swiss State retains full legal accountability under the Convention.

Highlighted requested clarifications on the pipeline project, on routing alternatives and the project's promoters, making clear that the pipeline was the subject of these concerns.

Noted that communication, transparency, and stakeholder engagement had improved through updated signage, public notifications, and NGO roundtables. At the same time, it requested the national authorities to share the concrete outcomes of these meetings with the Bureau.

Asked whether an Environmental Impact Assessment (EIA) was required for such a project within an Emerald Network site and, if so, asked for the assessment's results.

Noted that the complainant emphasised that the site is part of the Emerald Network and accordingly invited the authorities to clearly state and communicate this designation to reinforce the site's recognition and conservation importance.

Both parties are requested to submit progress reports on the elements highlighted above as well as any new developments to the Bureau's **forthcoming June 2026 meeting**.

The case remained on **standby**.

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

*[Government Report Not Received]*  
*[T-PVS/Files(2025)2022-07\_comp - Complainant Report]*

**Decision:** The Bureau:

Thanked the complainant for the submission of a detailed report and regretted the absence of a report from the authorities for the second consecutive time. It urged the Government to respect its reporting obligations on case files.

Noted the complainant's allegation that no progress had been made towards the implementation of the Bureau's decision of March 2024, nor of the ruling of the Constitutional Court of 11 July 2024, which declared null and void the Decision of the Government of the Federation of Bosnia and Herzegovina on the Change of Purpose of Forest Land and Temporary Use of Forest Land for Other Purposes, and required that all related decisions be annulled. It urged the Government to implement this ruling without delay and reiterated its request to be kept informed of the measures taken in this regard.

Expressed concern at the situation described by the complainant in the Trstionica Primeval Forest, classified as a strictly protected area under IUCN Category I and as a Category II High Conservation Value Forest, including habitat destruction, water pollution, and the dumping of mining waste, which have allegedly resulted in the degradation of aquatic ecosystems and widespread tree die-off along the Trstionica River. It further regretted that no measures appear to have been taken to prevent further biodiversity loss in this area.

Recalled that, at its last meeting, it had recommended the carrying out of a comprehensive Environmental Impact Assessment (EIA) to evaluate the ongoing damage, together with the adoption of immediate measures to prevent further environmental degradation. It regretted that no information had been provided by the authorities in this respect and reiterated its request for detailed and precise diagnostic elements in their next report.

Recalled the importance of ensuring transparency and public access to all concession agreements and related documents. It encouraged the competent authorities to strengthen communication and information-sharing practices in order to guarantee transparent engagement with local communities.

In view of the seriousness of the alleged damage and the lack of response from the respondent, decided to elevate the status of the complaint to a **Possible File**.

Requested the respondent to provide an update report for the **45<sup>th</sup> Standing Committee meeting** and invited both parties to present a brief update on the situation at that occasion.

### 7.5. New (pending) complaints

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

*[Government Report Not Received]*  
*[T-PVS/Files(2025)2024-02\_comp - Complainant Report]*

**Decision:** The Bureau:

Acknowledged with solidarity the importance of the National Military Memorial Cemetery for the purpose of honouring the memory of those who gave their lives for the freedom and independence of Ukraine.

Observed that there is an overlap of the site with the Emerald Network. It would be helpful for the scope of the overlap to be defined, and what proportion of the Emerald Network site is to be taken up by the Memorial Cemetery. The Bureau thus requested a map of the area so it can be better appreciated and visualised, providing information in regard to the overlaps and phasing of the project.



Requested the national authorities to provide information on the design of the site in terms of its landscaping; the choices of flora that may be introduced in that process; what pre-existing flora will be retained and managed. Related to this, the respondent is asked to clarify the consideration of any minimum environmental impact, and whether an impact assessment has been carried out and explain its conclusions, recommendations and compensatory advice therein. The respondent is also asked to clarify what compensatory measures have been undertaken or planned for the site or elsewhere.

Pointed to the principle that conservation is precautionary, and that in cases of uncertainty, the prudent choice is to avoid irreversible damage. The complainant has indicated the survey results that identify rare and protected species with evidence of habitat degradation. The Bureau invited the respondent to substantiate the claim of minimal environmental impact with evidential data – the respondent stated that the site occupies less than 5% of its territory [Emerald Network site], does not include objects of the nature reserve fund, as well as species protected by the Red Book of Ukraine and the Bern Convention.

Requested the respondent to provide detail on the timetable of the development phases of the site and detail on the design once all phases are complete. The potential for future enlargements of the site should also be indicated with comment on the likelihood and impact of that possibility, and an explanation for the process or constraints that would be observed.

Noted that the Ukrainian courts, including the Supreme Court, have recognised the site as part of the Emerald Network, subject to Bern Convention protections. The Bureau acknowledged that the situation is particular, but Emerald Network sites are not to be used in this way.

Noted that the respondent has indicated two alternative sites that were considered, and the reasons why they were not deemed suitable. The Bureau therefore asked, given the importance of the Cemetery to the Ukrainian nation, was there not an earlier opportunity to provide explanatory communications and receive input from the public, to ensure that the best decision is reached and understood by all interested parties.

Noted that Ukraine had passed national legislation (in 2022 and 2023) and intends to invoke an Article 9 derogation under the Bern Convention (public interest exceptions) in order to support and defend the decision to construction the National Military Memorial Cemetery at the site. As indicated by the respondent, the Bureau is keen to receive the mentioned supplementary information and the environmental study in regard to the derogation from the provisions of the Bern Convention under Article 9 so that the respondent can substantiate with evidence its assertion for a legitimate derogation.

Fully accepted that the respondent establishes that the cemetery is of national symbolic importance, especially during wartime, and also noted that the complainant does not dispute this symbolic importance but stresses that legal obligations cannot be ignored. The Bureau acknowledged that the public interest claim is strong, but it must be balanced against the extent of ecological harm. The respondent is therefore invited to present a robust case to demonstrate the significant grounds for derogation.

Requested that the respondent:

- Provide an update on court and appeal processes with the reactions of the Ministry;
- State the mitigation measures that are planned or already underway;
- Submit the environmental study and full Article 9 justification, whereby the Bureau/Standing Committee can reassess the derogation validity at the next possible opportunity, weighing symbolic/public interest against documented ecological harm;
- Offer dialogue and consultation options to the complainant and interest groups.

The Bureau invites both parties to submit reports in response to this decision in time for the **Spring Bureau in 2026**.

The status of the case-file remains as **New (pending)**.

### 7.6. New complaints

- 2024/03: Serbia: Alleged destruction of the habitat of the little cormorant *Microcarbo pygmeus* on the Sava River in Belgrade

[\[Complaint form\]](#)

*[Government Report Not Received]*

**Decision:** The Bureau:

Regretted that no report was submitted by the national authorities.

Postponed the consideration of the case-file to the Spring Bureau meeting of 2026.

Invited the authorities to submit reports for examination during the **Spring Bureau of 2026**.

- 2024/04: Cyprus: Alleged threat to protected bird species due to drying of settling lagoons in Mia Millia (Haspolat)

[\[Complaint form\]](#)

*[Government Report Not Received]*

**Decision:** The Bureau:

Regretted that no report was submitted by the government in time for consideration at the present meeting.

Noted that the authorities' response was promised by the end of September 2025, potentially allowing the case-file to be considered at the extraordinary meeting in October.

- 2024/05: Bosnia & Herzegovina: Alleged threat to habitat and protected species from the 'Upper Horizons' Hydropower Project

[\[Complaint form\]](#)

[\[T-PVS/Files\(2025\)2024-05\\_gov\]](#) - Government Report

**Decision:** The Bureau:

Thanked the complainant for their submission and the respondent for their reports.

Noted that the Ministry asserts compliance with legal procedures, multiple concerns exist about the transparency, quality, and public consultation of Environmental Impact Assessment (EIA) updates and permit renewals. The respondent has explicitly stated that the authorities lack complete data and the recent studies are ongoing (not yet available). Therefore, ongoing biodiversity studies indicate incomplete information on key endemic species. Given these concerns related to protected species, the Bureau encouraged the respondent to address these information gaps prior to proceeding with further progression of process or decision making on the project.

Observed that the evidence from the complainant suggests high risk of irreversible damage to endemic species, karst hydrology, and transboundary wetlands, which requires further independent scientific verification. The Bureau invited the respondent to address these concerns - the EIA is needed to elaborate an understanding on the impact on the affected habitats and the damage to endemic species.

Acknowledged the stated socioeconomic benefits and advantages, namely flood control, irrigation, and energy generation are legitimate public interests; the multipurpose nature of the project is recognised. Nevertheless, there are legal and procedural compliance concerns, relating to conflicting interpretations of court rulings and permit renewals; the Bureau therefore encouraged a careful legal review is warranted. The Bureau requested that an update on any activities related to legal and Court processes be provided.



Also recognised that the landscape of internal governance and territorial responsibilities and competencies in Bosnia and Herzegovina is complex and particular. The Bureau requested an elaboration on this and any internal transboundary concerns that exist for the project in this regard.

Also requested an independent, peer-reviewed scientific assessment of ecological impacts, including transboundary effects, and encouraged the verification of procedural compliance, particularly concerning public participation and permit renewals, and encouraged engagement with the complainant and stakeholders, as well as dialogue between Republika Srpska authorities, BiH federal institutions, and Croatia to harmonise water management and biodiversity protection.

Encouraged that both complainant and respondent engage in dialogue on the stated concerns and provide an update on consultations between parties.

Invited both parties to submit reports in response to this decision in time for the **Summer Bureau in June 2026**.

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

- 2025/01: Serbia: Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River

[\[Complaint form\]](#)

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

**Decision:** The Bureau:

Acknowledged the concerns raised by the complainant regarding the development of the small hydropower plant project and thanked the government for its submission of the relevant report pertaining to this matter.

Noted that, based on the information provided, the proposed site for the small hydropower plant does not fall within any formally protected areas. However, the Bureau wished to underline that habitats and nature constitute interconnected networks, and alterations or activities conducted in one area can have significant repercussions on adjacent or related ecosystems.

With regard to the specific matter of the site identified as "Studenica," it requested clarification as to its status as pSCI under the Natura 2000 ecological network.

Requested additional clarification regarding the capacity of the small HPP and information concerning the rules established by the relevant local authority, Krajevo, with respect to the construction of small hydropower plants (SHPP).

Requests detailed information about the timeline for the implementation of the small hydropower plant project.

Sought clarification with respect to the Environmental Impact Assessment (EIA) procedure and whether it is mandatory in the case of the Studenica small hydropower plants (SHPP).

Strongly encouraged the government to conduct a comprehensive Environmental Impact Assessment (EIA) in line with existing standards and procedures.

Invited both parties to submit reports in response to this decision for examination during the **Summer Bureau in June 2026**.

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

- 2025/02: France: Alleged damage to the protected species present and their habitats in the context of the project to reopen navigation on the Rhône-Rhine canal

[\[Complaint form\]](#)

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

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

**Decision:** The Bureau:

Acknowledged the detailed reports submitted by both parties concerning the complaint filed by the association Subguards Fun Sauvage regarding the project to reopen navigation on the Rhône-Rhine canal.

Thanked the parties for their contributions and noted the efforts of the French Government, including extensive environmental impact studies, the implementation of mitigation and avoidance measures, and the conduct of public consultations and regulatory compliance consistent with national and European legislation.

Nonetheless, the Bureau expressed concern over several critical issues:

The phased approach to the project was criticised as fragmenting the environmental assessment process, thereby impeding a comprehensive understanding of cumulative ecosystem impacts.

The late discovery of a kingfisher nest, absent in initial surveys, highlighted significant gaps in baseline ecological data.

The reports included references to environmental studies and conclusions on species preservation. However, these were general and summary in nature, lacking detailed scientific data such as quantitative ecological or biological evidence. The Bureau requested that future reports include these studies as annexes and incorporate their findings more thoroughly.

Legal questions remained regarding the adequacy of derogation procedures for impacts on protected species, notably given recent national legislative amendments reducing liability for unintentional harm, potentially weakening preventive mechanisms.

Underscored the significant risks posed to strictly protected species, including the common kingfisher (*Alcedo atthis*), Eurasian beaver (*Castor fiber*), and several bat species.

Further, the project threatens the integrity of an important ecological corridor forming part of a broader green and blue infrastructure network vital for regional biodiversity.

Concerns were raised regarding the governance framework, specifically that the management may not fully consider or integrate the site within the wider ecological network it belongs to, reflecting potential fragmentation in environmental governance.

Regarding invasive species, the Bureau noted that some species reported by the complainant were identified as invasive exotics not relevant for the assessment of native biodiversity under the Bern Convention. The complainant was encouraged to focus observations on indigenous species of conservation concern.

In conclusion, the Bureau requested that the Government provide, in future communications:

- Detailed scientific study references included as annexes;
- Clear descriptions of current and planned mitigation measures particularly for protected species;
- Comprehensive cumulative impact assessments covering the project as a whole, with timelines for ongoing evaluation;
- Enhanced environmental monitoring with active stakeholder participation, including the complainant, to increase transparency and accountability;
- Updates on all relevant judicial and administrative developments affecting project governance and compliance.

Both parties are to submit progress reports for the **Bureau's Spring 2026 meeting**.

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

- 2025/03: Ukraine: Alleged destruction of aquatic habitats and fish in the Emerald Network site - Skhidnyi Svydovets - UA0000259 due to the construction of hydropower plants in the Teresva River basin

[Complaint form]  
[Government Report Not Received]

**Decision:** The Bureau:

Regretted that no report was submitted by the government.

Postponed the consideration of the case-file to the Spring Bureau meeting of 2026.

Invited the authorities to submit reports for examination during the **Spring Bureau of 2026**.

- 2025/04: Ukraine: Alleged habitat destruction in the Osokorky Meadows Reserve due to proposed transportation network constructions

[Complaint form]  
[Government Report Not Received]

**Decision:** The Bureau:

Regretted that no report was submitted by the government.

Postponed the consideration of the case-file to the Spring Bureau meeting of 2026.

Invited the authorities to submit reports for examination during the **Spring Bureau of 2026**.

### 7.7. Follow-up of previous recommendations and case-files

- Türkiye: Recommendation No. 95 (2002) on the conservation of marine turtles in Kazanlı beach

[T-PVS/Files(2025) Recommendation No.95\_gov - Government Report]  
[T-PVS/Files(2025) Recommendation No.95\_comp - Complainant Report]

**Decision:** The Bureau thanked both parties for submitting detailed reports.

Welcomed the efforts of the Turkish government in the removal of some buildings in the area.

Expressed concern about the consistent decrease in the numbers of nests of *Chelonia mydas* in Kazanlı, reported by the authorities.

While acknowledging the efforts and advances detected in the area, remained concerned about critical recommendations which have not been implemented or only partially: Rec. 1, 2, 3, 5, 7, 10, 14. In particular, the presence of greenhouse structures (Rec.1), persistence of car light, plastic and chemical pollution (Rec. 3 and 10) on the beaches, and the storing of a tremendous amount of chemical toxic residues in the factory near the nesting beach, is of particular concern, bearing in mind that their removal and/or adequate treatment was already included in **Recommendation No. 66 (1998)** on the conservation status of some nesting beaches for marine turtles in Türkiye.

Regretted that there was still no comprehensive and effective monitoring of the sea turtle nesting activity in the area (Rec. 5), and that the information and public awareness raising remained poor (Rec.7).

Stressed the importance of advancing decisively in implementing Recommendation No. 95 (2002), most specially in critical points which are not, or insufficiently being addressed.

Requested both parties to submit progress reports to the Standing Committee in December 2025 and make brief presentations at the meeting.

Based on the information provided by the parties, suggested the Standing Committee to consider potential re-opening of the case, if no sufficient and clear advances in the provisions of Recommendation No. 95 (2002) are adopted by the Turkish authorities.

- Iceland: Recommendation No.190 (2016) on the conservation of natural habitats and wildlife, specially birds, in afforestation of lowland in Iceland

[\[T-PVS/Files\(2025\)Recommendation No.190\\_gov](#) - Government Report]  
[\[Complainant Report Not Received\]](#)

**Decision:** The Bureau:

Thanked the Government for the submission of its most recent report.

Acknowledged ongoing positive developments and welcomed the drafting of Iceland's biodiversity policy.

Invited the government to briefly present the updates at the 45<sup>th</sup> Standing Committee meeting in December 2025.

- 2004/04: Bulgaria: Via Pontica

[\[T-PVS/Files\(2025\)Recommendation No.200\\_gov](#) - Government Report]  
[\[T-PVS/Files\(2025\)Recommendation No.200\\_comp](#) - Complainant Report]

**Decision:** The Bureau:

Thanked both parties for their reports, noting the delay with which the complainant's report was submitted.

Appreciated the advancements in the implementation of the Recommendation 200 (2018), reported by the respondent, but expressed concern about the difference between the conclusions of the update reports of the parties.

Noticed with concern that the developments since 2023 seemed to be limited in scope.

Asked for information on the findings of the independent assessments of windfarm impacts, the methods applied in monitoring and its results, including a historically low numbers of wintering birds in 2022–23, as well as the implications of those findings for the further planning and operations of the windfarm installations.

Requested an explanation on the monitoring schemes, including but not exclusively the collision-prevention “early warning system”, and their coordination across all the Kaliakra installations, as well as information on how the approach was replicated at other sites.

Urged the authorities to ensure transparent sharing of monitoring results and to cooperate with the civil society and wider public, in particular in monitoring of the impact of the measures taken and identifying further actions according to the findings.

Urged the authorities to renew the moratorium on windfarm development in sensitive locations, especially in view of accelerating development of wind farms.

Invited both parties to share further updates and make brief presentations at the **45<sup>th</sup> Standing Committee meeting in 2025**, where a consideration may be given to reopening of the case file if the developments do not seem satisfactory.

## 7.8. Follow-up on wolf complaints

The Secretariat informed the Bureau that following the receipt of over 600 complaints regarding the EU proposal to change the status of the wolf from Appendix II “strictly protected species” to Appendix III “protected species”, it was necessary to streamline the work. A potential lead complainant was identified, an NGO in Germany that filed the earliest dated complaint. Furthermore, an NGO from France and a second NGO from Germany confirmed their willingness to be co-complainants in this case.

The Secretariat sought advice from the Bureau on how to address the country-specific issues in the complaints when they concern the EU proposal to downlist the wolf and all the potential consequences of this decision, including within a national context.

**Decision:** The Bureau took note of the information provided and instructed the Secretariat to address the request for follow-up on the complaint to the EU, putting the countries mentioned in the complaint forms in copy of the communication, for their information.

## 7.9. New complaint forms received

The Bureau was informed of the list of new complaints filed with the Secretariat. Their admissibility remained to be evaluated. Some could potentially be merged with the existing case-files but the overall number of the latter was likely to further increase.

**Decision:** The Bureau took note of the information provided.

## 8. COMMUNICATIONS

### 8.1. Communications campaign relating to EDPA

The Secretariat informed the Bureau of the communication campaign on the occasion of the 60<sup>th</sup> Anniversary of the European Diploma for Protected Areas. The Secretariat reported that the campaign focused on five success stories, namely:

- Bavarian Forest National Park (Germany) – showcasing the restoration of woodlands;
- Szénás Hills Protected Area (Hungary) – recognising its conservation efforts towards the *Dolomite flax*, an endemic species;
- Oostvaardersplassen Nature Reserve (the Netherlands) – highlighting its efforts towards inclusivity and accessibility, ensuring that everyone can enjoy nature;
- Montecristo Island Nature Reserve (Italy) – demonstrating nature resilience through its ancient oak holm forest;
- Marcantour National Park (France) and Maritime Alps Nature Park (Italy) – celebrating the return of the bearded vulture through cross-border cooperation.

Videos and picture carousels, accompanied by catchy messages were published throughout July and August on the Council of Europe main social media platforms as well as the Council of Europe thematic pages on Environment.

An outreach kit was shared with the managers of the other Diploma holding areas which would allow them to create their own poster in line with the visual identity of the campaign.

**Decision:** The Bureau took note of the information provided.

### 8.2. Other communications activities

The Secretariat informed the Bureau of the ongoing process of reprinting an information brochure and the text of the Bern Convention, including its Appendices. Several Bureau members noted that the Latin names of certain species listed in the Appendices have since changed, which has delayed the process in order to allow for their integration. The Secretariat reported that the translation of the Appendices into the two official languages of the Council of Europe, English and French, for publication on the website, is well advanced.

**Decision:** The Bureau took note of the information provided. It tasked the Secretariat with updating Appendices II and III to reflect the change in the protection status of the wolf (*Canis lupus*), from strictly protected species (Appendix II) to protected species (Appendix III), so as to enable the reprinting of the Convention before the 45<sup>th</sup> meeting of the Standing Committee. Concerning the updating of the Appendices to incorporate changes in Latin nomenclature, the Bureau requested the

Secretariat to prepare a proposal, based on the nomenclature used by IUCN, for consideration by the 46<sup>th</sup> meeting of the Standing Committee in 2026.

## **9. UPDATE FROM THE DEPARTMENT ON THE REYKJAVIK PROCESS AND THE ENVIRONMENT**

The Secretariat reminded the Bureau of the ministerial conference organised on the occasion of the 25th anniversary of the Landscape Convention (Florence, 27 October 2025), during which the Sierra Nevada National Park, Nature Park and Biosphere Reserve will be officially awarded the European Diploma for Protected Areas.

The Secretariat also informed the Bureau that the Secretary General of the Council of Europe is expected to attend the opening of COP30 in Belém, Brazil (November 2025), along with a Council of Europe delegation. The Council of Europe is organising a side-event on Human Rights and Climate Disinformation: Responding to youth.

The Bureau was also informed that its Chair would participate in the 5<sup>th</sup> and final meeting of the Multidisciplinary Group on the Environment (GME) (2-4 December 2025). The GME is expected to adopt a progress report on the implementation of the Council of Europe Strategy on the Environment and hold a thematic discussion on Human Rights and Climate disinformation.

**Decision:** The Bureau took note of the information provided.

## **10. ANY OTHER BUSINESS**

### **10.1. Dates of the next Bureau meetings**

The Secretariat proposed the dates of the next Bureau meeting.

**Decision:** The Bureau took note of the suggested dates and decided to hold the next meeting in Strasbourg on 7 - 9 April 2026.

### **10.2. Requests for Observer status under the Bern Convention**

The Secretariat informed the Bureau that it received requests from the following two NGOs for observer status under the Bern Convention (Article 13, para. 3):

- Spanish Association for Falconry and Conservation of Birds of Prey - AECCA (*Asociación Española de Cetrería y Conservación de Aves Rapaces*);
- Mammal Conservation Europe (MCE).

As stated in Article 13, para. 3, of the Convention, they will be admitted unless, at least one month before the meeting of the Standing Committee, one-third of the Parties have informed the Secretariat of their objection.

**Decision:** The Bureau took note of this information.

## **Appendix I – Draft Agenda**

### **1. OPENING OF THE MEETING & ADOPTION OF THE AGENDA**

#### **1.1. Adoption of the agenda**

### **2. REPORT FROM THE SECRETARIAT**

#### **2.1. Staff announcements**

### **3. FINANCING AND STRATEGIC DEVELOPMENT OF THE BERN CONVENTION**

#### **3.1. Voluntary contributions received in 2025: state of play and use of resources**

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

#### **3.2. Working Group on exploring mechanisms to guide amendments to the appendices of the Bern Convention**

#### **3.3. Working Group on sustainable financing options**

#### **3.4. Working Group on overseeing implementation of the Strategic Plan**

#### **3.5. Thematic Groups of Experts and Working Groups under the Bern Convention: state of play**

*[T-PVS/Inf(2025)30 - Overview of the thematic group of experts and working groups set up under the Bern convention]*

#### **3.6. Rules of procedure of the Standing Committee and Working Groups**

### **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. Meeting of the Group of Experts on Protected Areas and Ecological Networks**

#### **4.2. 8th Meeting of the Ad hoc Working Group on Reporting and training course on reporting for non-EU contracting parties**

#### **4.3. Update on the European Diploma for Protected Areas (EDPA)**

- Call for specialists
- Award ceremony of the EDPA to the Sierra Nevada National Park, Nature Park and Biosphere Reserve

*[T-PVS/DE(2025)07\_Report of the Meeting of the Group of Specialists 2025]*

*[T-PVS/DE(2025)08\_Report of the Roundtable of Managers EDPA]*

#### **4.4. Follow-up to the joint meeting with the CMS MIKT on IKB and Group of Experts on the Conservation of Birds**

*[T-PVS(2025)XX Meeting Report of the Group of Experts on the Conservation of Birds]*

#### **4.5. Follow-up to the meeting of the Group of Experts on Large Carnivores**

*[T-PVS(2025)11 Meeting Report of the Group of Experts on Large Carnivores]*

#### **4.6. Follow-up to the meeting of the Group of Experts on Amphibians and Reptiles**

*[T-PVS(2025)XX Meeting Report of the Group of Experts on Amphibians and Reptiles]*

#### **4.7. Follow-up to the meeting of the Group of Experts on Invasive Alien Species**

*[T-PVS(2025)XX Meeting Report of the Group of Experts on Invasive Alien Species]*

#### **4.8. Action Plan for the eradication of the Ruddy Duck in Europe: state of play**

#### **4.9. Activities on the negative impact of mining on biodiversity**

### **5. 45TH STANDING COMMITTEE MEETING**

#### **5.1. Draft Agenda**

*[T-PVS/Agenda(2025)21 – Preliminary draft agenda]*

#### **5.2. Programme of activities 2026**

*[T-PVS(2025)12 – Preliminary draft programme of Activities and budget for 2026]*

### **11. MONITORING OF THE IMPLEMENTATION OF THE LEGAL ASPECTS OF THE CONVENTION (Biennial reporting and Online Reporting System)**

#### **11.1. Online Reporting System: update**

### **12. IMPLEMENTATION OF THE CONVENTION: CASE-FILES**

*[T-PVS/Notes(2025)05 – Summary of open and possible case files]*

*[T-PVS/Notes(2025)06– Summary of complaints on stand-by]*

*[T-PVS/Notes(2025)07– Summary of new & pending complaints]*

*[T-PVS/Inf(2025)17– Register of Bern Convention's case-files]*

#### **12.1. Options to improve the Complaint System: exchange of views with an expert**

#### **12.2. Open files**

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

*[T-PVS/Files(2025)1986-08 .gov - Government Report]*

*[T-PVS/Files(2025)1986-08 .comp - Complainant Report]*

- 2010/05: Greece: Threats to marine turtles in Thines Kiparissias - *on-the-spot appraisal (OSA)*

*[T-PVS/Files(2025)2010-05 .gov - Government Report]*

*[T-PVS/Files(2025)2010-05 .comp - Complainant Report]*

- 1995/06: Cyprus: Akamas peninsula

*[Government Report Not Received]*

*[T-PVS/Files(2025)1995-06 .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]
- 2016/04: Montenegro: Development of a commercial project in Skadar Lake National Park and candidate Emerald site  
[\[T-PVS/Files\(2025\)2016-04\\_gov\]](#) - Government Report]  
[\[T-PVS/Files\(2025\)2016-04\\_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  
  
[Government Report Not Received]  
[\[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]

### **12.3. Possible files**

- 2001/04: Bulgaria: Motorway through the Kresna Gorge  
  
[\[T-PVS/Files\(2025\)2001-04\\_comp\\_gov\]](#) – Government/Complainant Joint 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]
- 2022/02: Austria: Alleged violation of the Convention in relation to deliberate killing of lutra lutra  
  
[Government Report Not Received]  
[\[T-PVS/Files\(2025\)2022-02\\_comp\]](#) - Complainant Report]

### **12.4. Complaints on stand-by**

- 2017/06: Iceland: Possible negative impact on Breiðafjörður Nature Reserve's authentic birch woods from new road infrastructure  
  
[Government Report Not Received]

*[Complainant Report Not Received]*

- 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]

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

[\[T-PVS/Files\(2025\)2021-08\\_gov\]](#) - Government Report]  
[\[T-PVS/Files\(2025\)2021-08\\_comp\]](#) - Complainant Report]

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

*[Government Report Not Received]*  
[\[T-PVS/Files\(2025\)2022-04\\_comp\]](#) - Complainant 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\(2025\)2023-02\\_gov\]](#) - Government Report]  
[\[T-PVS/Files\(2025\)2023-02\\_comp\]](#) - Complainant Report]

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

*[Government Report Not Received]*  
[\[T-PVS/Files\(2025\)2022-07\\_comp\]](#) - Complainant Report]

## **12.5. New (pending) complaints**

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

*[Government Report Not Received]*  
[\[T-PVS/Files\(2025\)2024-02\\_comp\]](#) - Complainant Report]

## **12.6. New complaints**

- 2024/03: Serbia: Alleged destruction of the habitat of the little cormorant *Microcarbo pygmeus* on the Sava River in Belgrade

[\[Complaint form\]](#)  
*[Government Report Not Received]*

- 2024/04: Cyprus: Alleged threat to protected bird species due to drying of settling lagoons in Mia Millia/Haspolat

[\[Complaint form\]](#)  
*[Government Report Not Received]*

- 2024/05: Bosnia & Herzegovina: Alleged threat to habitat and protected species from the 'Upper Horizons' Hydropower Project

[\[Complaint form\]](#)  
[\[T-PVS/Files\(2025\)2024-05\\_gov\]](#) - Government Report]

- 2025/01: Serbia: Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River

[\[Complaint form\]](#)  
[\[T-PVS/Files\(2025\)2025-01\\_gov\]](#) - Government Report]

- 2025/02: France: Alleged damage to the protected species present and their habitats in the context of the project to reopen navigation on the Rhône-Rhine canal

[\[Complaint form\]](#)

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

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

- 2025/03: Ukraine: Alleged destruction of aquatic habitats and fish in the Emerald Network site - Skhidnyi Svydovets - UA0000259 due to the construction of hydropower plants in the Teresva River basin

[\[Complaint form\]](#)

[\[Government Report Not Received\]](#)

- 2025/04: Ukraine: Alleged habitat destruction in the Osokorky Meadows Reserve due to proposed transportation network constructions

[\[Complaint form\]](#)

[\[Government Report Not Received\]](#)

## **12.7. Follow-up of previous recommendations and case-files**

- Turkey: Recommendation No. 95 (2002) on the conservation of marine turtles in Kazanlı beach (Türkiye)

[\[T-PVS/Files\(2025\) Recommendation No.95\\_gov - Government Report\]](#)

[\[T-PVS/Files\(2025\) Recommendation No.95\\_comp - Complainant Report\]](#)

- Iceland: Recommendation No.190 (2016) on the conservation of natural habitats and wildlife, specially birds, in afforestation of lowland in Iceland

[\[T-PVS/Files\(2025\)Recommendation No.190\\_gov - Government Report\]](#)

[\[Complainant Report Not Received\]](#)

- 2004/04: Bulgaria: Via Pontica

[\[T-PVS/Files\(2025\)Recommendation No.200\\_gov - Government Report\]](#)

[\[T-PVS/Files\(2025\)Recommendation No.200\\_comp - Complainant Report\]](#)

## **12.8. Follow-up on wolf complaints**

## **12.9. New complaint forms received**

# **13. COMMUNICATIONS**

## **13.1. Communications campaign relating to EDPA**

## **13.2. Other communications activities**

# **14. UPDATE FROM THE DEPARTMENT ON THE REYKJAVIK PROCESS AND THE ENVIRONMENT**

# **15. ANY OTHER BUSINESS**

## **15.1. Dates of the next Bureau meetings**

## **15.2. Requests for Observer status under the Bern Convention**

## **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

### **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

### **SECRETARIAT**

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

Ms Grazia Alessandra SIINO, Secretary of the Bern Convention

Mr Mikaël POUTIERS, Co-Secretary of the ad hoc Multidisciplinary Group on the Environment (GME)

Ms Marta MEḂLIŃSKA, Project Manager

Mr Michaël NGUYEN, Administrative and Project officer

Ms Irina SPOIALA, Administrative assistant

Mr Mark BARLOW, Administrative assistant

Ms Lilas HEULLANT, Administrative assistant

### Appendix III

#### Composition of the Group of Specialists on the European Diploma for Protected Areas

Name	Country	End of term of office
Ms Stefanie STENZEL	Germany	December 2026
Mr Christian KAYSER	Luxembourg	December 2027
Ms Mariam MACHARASHVILI	Georgia	December 2028
Mr Simon KLINGLER	Austria	December 2029
Mr Jan PLESNIK	Czech Republic	December 2029
Mr Antonios BARNIAS	Greece*	December 2029
Ms Simone REMUND	Switzerland	December 2029
Ms Oya BUMIN	Türkiye	December 2029

\* The Bureau decided to place Ms Ioulia DROUGA (Greece) on a reserve list to replace Mr BARNIAS in the event that the latter leaves office before the end of his term of office.