21 October, 2026
Armenia

JOINT URGENT APPEAL TO THE UN SPECIAL PROCEDURES

On the Amulsar Gold Mine Project in Armenia: environmental and water-related risks, biodiversity conservation, public participation and the protection of environmental human rights defenders

Proposed mandate holders

This appeal is primarily addressed to the Special Rapporteur on the human right to a clean, healthy and sustainable environment, with a request for joint consideration by the following mandate holders:

- Special Rapporteur on the human rights to safe drinking water and sanitation
- Special Rapporteur on the situation of human rights defender
- Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression
- Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes
- Special Rapporteur on the right to health
- Working Group on the rights of peasants and other people working in rural areas

State Concerned: Republic of Armenia

Submitting parties: "Rights Centre" NGO, "Human Rights Research Centre" NGO, "New Justice Culture" NGO, "Helsinki Association human rights protection" NGO, "Protection of Rights Without Borders" NGO, "Armenian Environmental Front" Civic Initiative, "Centre for Community Mobilization and Support" NGO, Transparency International Anti-Corruption Center, "Green Armenia" NGO, Armenian Climate Justice Initiative, "Amulsar Without Mine" Civic Initiative, "Ecological Rights" NGO, "+374 Political Self-Determination Club" NGO, "Disability Rights Agenda" NGO, "Armenian Forests" NGO.

1. Summary of urgent human rights concerns

This joint appeal raises concerns regarding the commencement of operations at the Amulsar gold mine in southern Armenia in October 2026, including the risks posed to water resources, biodiversity, ecosystems and local livelihoods, the adequacy of environmental impact assessment and public decision-making, and the situation of environmental human rights defenders who have raised concerns about the project.

The concerns are based on an independent assessment commissioned by Armenia's Investigative Committee in 2019, subsequent concerns raised by civil society, and recommendations made under the Bern Convention. The project poses a risk of causing irreversible harm to the environment and to the health and well-being of people living in nearby settlements.

The central concern is that the authorities have not made accessible and scientifically robust evidence available to demonstrate that identified risks-including risks associated with water-resource modelling, acid rock drainage, seismic activity and biodiversity-have been adequately addressed. Potential contamination affecting the Arpa and Vorotan river systems, groundwater and the mineral waters associated with Jermuk could have long-term consequences and warrants transparent assessment, monitoring and emergency safeguards.

The case also raises concerns about the adequacy of biodiversity offsets and implementation of Armenia's international conservation commitments. In parallel, defamation proceedings brought by Lydian Armenia against individuals who have criticised the project may deter environmental defenders, community members and journalists from participating in public debate. A draft amendment to Armenia's Law on Environmental Impact Assessment and Expertise, published on e-draft.am on 14 October 2026, may further weaken the practical role of local self-government bodies and affected communities in environmental decision-making.

The submitting organisations respectfully request urgent engagement with the Government of Armenia to clarify the scientific and legal basis for the mine's authorisation and operation, ensure public access to environmental information, assess and prevent potential serious or irreversible harm, protect environmental human rights defenders, and safeguard meaningful public participation.

2. Facts and developments giving rise to concern

2.1. Opening of the Amulsar Gold Mine Project

The Amulsar gold mine is a major mining project in southern Armenia that has been the subject of longstanding public opposition and environmental scrutiny. On 10 October 2026, the Armenian Government announced the opening of the mine and held a ceremony attended by the Prime Minister. This took place shortly before the seventeenth meeting of the Conference of the Parties to the Convention on Biological Diversity (COP17), hosted in Yerevan in October 2026.

On 12 October 2026, EcoLur reported that 65 civil society organisations and environmental activists had called for the suspension of mining operations, a new environmental impact assessment, and disclosure of measures taken to address deficiencies identified in earlier assessments. The submitting organisations are concerned that operations have commenced without public demonstration that the significant environmental and socio-economic concerns raised have been resolved.

2.2. Environmental assessment and risks to water resources and ecosystems

In 2019, the Armenian Investigative Committee commissioned an independent assessment by In 2019, the Armenian Investigative Committee commissioned an independent assessment by Earth Link & Advanced Resources Development (ELARD), working with TRC Environmental Corporation. The assessment examined the project's potential impacts on water resources and geology, biodiversity and air quality. The report identified deficiencies in the underlying environmental and social impact assessment documentation and reviewed the reliability of the methods, data and conclusions used to assess the project's impacts.

Civil society representatives have subsequently highlighted alleged deficiencies involving water-resource modelling, acid rock drainage calculations, seismic risks and biodiversity assessment. They have called on the Government to publish the measures taken to address each significant issue identified in the ELARD-TRC assessment and to explain what evidence supports the conclusion that the outstanding risks have been resolved.

The authorities have not demonstrated, through accessible and scientifically robust evidence, that the project can operate without unacceptable harm to water resources, ecosystems and human health.

There are concerns about the potential for acid rock drainage and the release of contaminants to affect the Arpa and Vorotan river systems, groundwater resources and the mineral waters associated with Jermuk. The relationship between the mine, regional hydrology and these resources requires particular scrutiny given the potential duration and consequences of contamination.

The Government should therefore disclose the current scientific basis for its decisions, including updated assessments where necessary, monitoring arrangements, emergency-response measures and the criteria used to determine whether the risks are acceptable. Independent monitoring and public access to monitoring results are important safeguards where potentially serious or long-lasting environmental effects are alleged.

2.3. Biodiversity conservation and the adequacy of biodiversity offsets

The Amulsar project also raises substantial concerns about the relationship between extractive development and biodiversity conservation.

The Global Forest Coalition has argued that the project's biodiversity offset programme cannot necessarily compensate for the destruction of natural habitats and the loss of ecological

relationships that may be difficult or impossible to recreate. It refers to concerns raised by independent organisations and experts about whether the proposed offset arrangements can adequately address the project's residual impacts.

Biodiversity offsets should not be treated as a substitute for avoiding or minimising environmental damage. Where a project threatens unique habitats or ecological systems, the authorities must establish whether the damage can genuinely be prevented or remedied and whether the proposed compensatory measures are scientifically credible, additional and capable of producing the claimed conservation outcomes.

The Amulsar case also raises questions about the compatibility of the project with Armenia's commitments under the Convention on Biological Diversity and the Kunming-Montreal Global Biodiversity Framework.

2.4. International conservation commitments and the Bern Convention

The Standing Committee and Bureau of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) has called on the Government of Armenia to halt all work at Amulsar, conduct a new Environmental Impact Assessment (EIA) for the mine, review and approve the list of Emerald Network sites of special conservation value, and establish Jermuk National Park as a biodiversity conservation area.

The reported recommendations are particularly relevant because they indicate that concerns about the project have also been considered within an international conservation framework. The authorities should explain publicly how they have implemented these recommendations, what scientific evidence supports any decisions to depart from them, and how the protection of relevant habitats and species has been ensured.

This appeal calls for the Special Rapporteur to consider the relationship between the project's authorisation and operation, the identified conservation concerns and Armenia's obligations to protect the environment and prevent foreseeable harm to the enjoyment of human rights.

2.5. Environmental human rights defenders and public participation

Environmental protection depends on the ability of communities, lawyers, journalists, scientists and civil society organisations to investigate and discuss projects that may affect public health, water resources and biodiversity.

Lydian Armenia has pursued defamation proceedings against individuals who have publicly criticised the Amulsar gold mine project, including environmental advocates, community members and journalists. The litigation has extended beyond the two recent cases involving Nazeli Vardanyan and Tehmine Yenoqyan. A database of SLAPP cases in Armenia documents proceedings initiated by Lydian Armenia against individuals who questioned the project's legitimacy, raised concerns about its environmental impacts or publicly opposed the mine. A 2020 investigation by the Business and Human Rights Resource Centre also documented numerous

defamation lawsuits brought by Lydian against activists and journalists opposing the project. Only in 2023 and 2024, at least 33 such lawsuits were documented.

The concern for the purposes of this appeal is the effect that repeated litigation and substantial financial claims may have on public participation. Even where claims are ultimately unsuccessful, the time, cost and pressure associated with litigation can deter environmental defenders and affected residents from raising concerns about projects of significant public interest.

Armenia is a Party to the Aarhus Convention. Article 3(8) of the Convention requires Parties to ensure that persons exercising rights are not penalised, persecuted or harassed for their involvement. The proceedings described above therefore raise questions about the practical protection available to people who exercise their environmental information, participation and accountability rights.

Environmental decision-making must also take into account the rights and perspectives of persons with disabilities, who may face disproportionate barriers in accessing environmental information, participating in consultations, obtaining essential services, and responding to environmental emergencies. Public participation mechanisms, environmental information and emergency preparedness measures must be accessible and inclusive, consistent with the Convention on the Rights of Persons with Disabilities.

Furthermore, on 14 October 2026, a draft law amending Armenia's Law on Environmental Impact Assessment and Expertise was published by the Ministry of Environment on the e-draft.am platform. The proposed amendments may significantly undermine the role of local self-government bodies and community participation in environmental decision-making. This will reduce affected communities' influence over decisions with potentially significant environmental and social consequences in their communities.

If adopted, these amendments could weaken local democratic oversight and meaningful public participation in environmental decision-making. This also raises concerns regarding Armenia's compliance with its international obligations to ensure access to environmental information, effective public participation, and access to justice, including under the Aarhus Convention.

3. Urgency and risk of serious or irreversible harm

The mine's reported opening and commencement of operations make the concerns immediate rather than hypothetical. Potential environmental effects involving water systems, groundwater, mineral waters and biodiversity may be difficult to reverse if they occur. The lack of publicly accessible information demonstrating how identified assessment deficiencies have been resolved, together with the need for transparent monitoring and emergency-response arrangements, supports a request for urgent clarification and precautionary safeguards.

The reported litigation against environmental defenders and the proposed legislative amendments may also narrow the practical opportunities for communities and civil society to scrutinise decisions and raise concerns. The submitting organisations therefore seek prompt engagement by

the mandate holders while operations are underway and the relevant legislative proposal is under consideration.

4. Requests to the Special Rapporteur

In light of the above, the submitting organisations respectfully request that Special Rapporteur, as well as the mandate holders, acting jointly where appropriate:

1. Seek information from the Government of Armenia regarding the authorisation and commencement of operations at Amulsar, including the scientific evidence relied upon to establish the project's environmental safety.
2. Request information on the measures taken to address the deficiencies identified in the ELARD-TRC assessment, particularly those relating to water resources, geology, seismic risks and biodiversity, and call for the publication of relevant assessments and monitoring data.
3. Encourage the authorities to ensure that the project is subject to an independent, scientifically robust and transparent environmental assessment, with meaningful public participation and effective opportunities to challenge decisions that may affect environmental rights.
4. Request clarification regarding the proposed amendments to the Armenia's Law on Environmental Impact Assessment and Expertise, calling upon the Government of Armenia to ensure that any amendments to environmental legislation comply with Armenia's international human rights obligations and applicable environmental commitments, including the procedural rights to access environmental information, participate meaningfully in environmental decision-making, and seek effective remedies.
5. Request clarification regarding the implementation of the Bern Convention's recommendations concerning Amulsar, the Emerald Network and the proposed Jermuk National Park.
6. Call on the Government to ensure that biodiversity offsets do not replace the obligation to prevent and minimise environmental damage and that any proposed offsets are supported by credible, independently verifiable scientific evidence.
7. Express concern about the potential chilling effect of litigation against environmental human rights defenders and call for effective protection of their rights to freedom of expression, association and participation in environmental decision-making.
8. Encourage the authorities to ensure access to effective remedies, independent oversight and publicly accessible environmental information, including information about pollution incidents, environmental monitoring and emergency-response procedures.
9. Recommend that the authorities review the project's environmental and social implications in light of the long-term interests of affected communities, including water security, public health, biodiversity conservation and sustainable livelihoods.

5. Conclusion

The right to a clean, healthy and sustainable environment requires more than the formal adoption of environmental policies or the announcement of biodiversity commitments. It requires effective prevention of environmental harm, access to reliable information, meaningful participation in

decisions and protection for those who seek to hold public authorities and private actors accountable.

The submitting organizations therefore respectfully request that the Special Rapporteur consider the issues raised in this appeal and engage with the Armenian authorities to promote transparent, evidence-based decision-making and effective protection of environmental human rights.

6. Sources and documents relied upon

EcoLur, "Civil Society Representatives Call for Suspension of Amulsar Mine," 12 October 2026. https://www.ecolur.org/en/news/sos/16556/

Global Forest Coalition, "Armenia's COP17 preparations expose the gap between biodiversity commitments and action," 14 October 2026. https://globalforestcoalition.org/armenias-cop17-preparations-expose-the-gap-between-biodiversity-commitments-and-action/

Draft amendments to Armenia's Law on Environmental Impact Assessment and Expertise, e-draft.am, published 14 October 2026. https://e-draft.am/projects/10745/about

ELARD and TRC Environmental Corporation, Independent 3rd Party Assessment of the Impacts of the Amulsar Mine on Water Resources and Geology, Biodiversity and Air Quality (2019), commissioned by Armenia's Investigative Committee. https://media.business-humanrights.org/media/documents/Independent_3rd_party_Assess_ELARD.pdf

Council of Europe, "The Amulsar gold mine project complaint" (Bern Convention). https://www.coe.int/en/web/bern-convention/-/the-amulsar-gold-mine-project-and-its-impacts-on-emerald-network-sites

SLAPP cases database, Armenia, 25 September 2025. https://green-armenia.org/storage/exel/1760612625_SLAPP_Cases_Database_Armenia_25.09.2025.pdf

Business and Human Rights Resource Centre, "SLAPP'd: The Armenian activists fighting a mining multinational's lawsuits." https://www.business-humanrights.org/en/latest-news/slappd-the-armenian-activists-fighting-a-mining-multinationals-lawsuits/

Human Rights House, "Strategic Lawsuits Against Public Participation in Armenia." https://staging.hrhyerevan.org/en/strategic-lawsuits-against-public-participation-in-armenia/