

January 22, 2019

**To: Nikol Pashinyan**  
**Prime Minister of the Republic of Armenia**  
Republic Square, Government House 1, 0010 Yerevan, Republic of Armenia

**Copied to:**  
**Sir Suma Chakrabarti, President, European Bank for Development and Reconstruction**  
**Clément Nyaletsossi Voule, United Nations Special Rapporteur on Rights to Freedom of Peaceful Assembly and of Association**

*Subject: Social and environmental impact of the Amulsar mine*

We, the undersigned civil society groups, stand in solidarity with the residents of Jermuk, Gndevaz and Kechut, and with the environmental activists and concerned civil society in Armenia and appeal to the Government of Armenia to act on the Amulsar mine project for the benefit of people and environment.

Extracting minerals, increasingly driven by the needs of the information, communications and technology sectors, puts at risk communities living in the vicinity of the mines and often is a direct threat to surrounding biodiversity. This is especially valid in the case of communities living near the Amulsar project, who face potential harm, uncertainty and a lack of information regarding the potential negative impacts of the mine on health, livelihoods and threats to water resources.

As the United Nations Special Rapporteur on Rights to Freedom of Peaceful Assembly and of Association Clément Nyaletsossi Voule concluded on 16 November 2018 during his visit to Armenia, the government should carry out genuine consultations so that mining projects align with the Guiding Principles on Business and Human Rights and the principles of the Sustainable Development Goals.

“Community Mutual Assistance” Social NGO assessed the public perceptions of the social impacts of the Amulsar mine in Armenia through surveys of neighbouring communities in October 2018 and found that citizens living around the Amulsar link Lydian investments with a growing fear for their health, access to clean water and sustainable livelihoods. The social report echoed the UN Special Rapporteur’s call for new and broader public consultations.

In addition to this sociological research, Balkani Wildlife Society conducted an independent analysis of the environmental impact assessment prepared by Lydian, which concluded that additional assessments related to environmental impacts are needed.

The residents of Jermuk were not consulted during the environmental and social impact assessment in 2015 and 2016. In relation to this the Compliance Advisor / Ombudsman of the International Finance Corporation concluded that the impact of the Amulsar mine on the Jermuk water and tourism brand was not properly assessed. The community has since tried using legal means, which has yet to bring any results in the last three years.

Since 22 June 2018, following Armenia’s Velvet Revolution, a constant blockade of the mine roads has prevented mine development works, although Lydian announced that it has secured short-term access to undertake winterization and preservation work on process and mobile equipment. In August 2018 Lydian International attempted to forcefully break up what it calls “illegal” road blockades and since then has taken legal action against protesters with demands of compensation for the material and non-material damages incurred by the company (hundreds of thousands of dollars per day). The corporation has also sued

activists, who spoke against mining in that area for “discrediting their good business reputation” and “defaming” them. Armenian Human Rights Defenders claim that PR strategy of the company is to humiliate and discredit them through their real and fake users in social media, online media and television, spreading personal slander and inciting hatred against them. Meanwhile the demands of protesters and civil society remain unanswered.

In view of the above, we call on the Government of Armenia to:

- Ensure the safety and security of Armenian citizens exercising their rights to protest and demand proper consultations, to protect them from the threats and legal persecutions and to ensure their meaningful participation in the decision-making process for the Amulsar mine;
- Revoke the positive conclusion (permit) for the environmental impact assessment regarding the Amulsar mining based on the existing new evidence, including studies conducted by local and international experts;
- Conduct additional, comprehensive studies aimed at: (1) Identifying the negative impacts of the mine in sensitive locations like Amulsar on the health and social conditions of the local population; (2) Assessing the implementation of Armenia’s commitments under local and international law to protect wildlife and specifically endangered habitats and species; (3) Identifying potential pollution of the water basins of Arpa and Vorotan rivers, and of Lake Sevan, as well as potential negative impact on Jermuk mineral thermal waters; (4) Conducting a cost-benefit analysis, including calculation on the long-term benefits and costs of damages to future generations.
- Halt mine construction activities until such studies are completed, publicise the findings and organise public hearings on them.

We stand in solidarity with the people of Jermuk, who do not want their city to turn from a health spa and tourist destination into a mining town. We stand in solidarity with Gndevaz and Kechut village residents, who have the right to continue their apricot orchards, wild plants collection, animal breeding and fish farming. We stand in solidarity with Armenian citizens concerned about their sustainable future and human rights. Human rights are universal. We want their rights to be respected as much as we want it for ourselves.

We kindly ask for a response to our appeals with this information about the steps to be taken by the Government of Armenia.

Signatories:

Amnesty International Poland  
Bank Information Centre  
Bank Information Centre Europe  
Both ENDS  
Business & Human Rights Resource Centre  
Buliisa Initiative for Rural Development Organisation (Uganda)  
Buy responsibly Foundation (Poland)  
CATAPA (Belgium)  
CEE Bankwatch Network  
Center for Environmental Initiatives 'Ecoaction' (Ukraine)  
Crude Accountability  
East European Democratic Centre (Poland)  
"EcoLur" Informational NGO (Armenia)  
Focus Association for Sustainable Development (Slovenia)  
Friends of the Earth Northern Ireland  
Friends of the Earth U.S.

Front Line Defenders  
Fundacja Go'n'Act (Poland)  
Fundacja Ari Ari (Poland)  
Gdansk Educational Foundation (Poland)  
Green Alternative (Georgia)  
Information Society Development Foundation (Poland)  
Institute of Global Responsibility (Poland)  
Jane Goodall Institut Austria  
London Mining Network (UK)  
Naturvernforbundet (Friends of the Earth Norway)  
NeSoVe / Netzwerk Soziale Verantwortung (Austria)  
Otwarty Plan Foundation (Poland)  
Oyu Tolgoi Watch (Mongolia)  
Polish Green Network  
Re:Common (Italy)  
Rivers without Boundaries  
SETEM Catalunya  
Südwind (Austria)  
The Corner House (UK)  
The Swedish Society for Nature Conservation (Sweden)  
Towarzystwo Demokratyczne Wschód (Poland)  
Urgent Action Fund for Women's Human Rights  
Urgewald (Germany)  
Villa Decius Association (Poland)  
Zagranica Group (Polish NGDO platform)