

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM INSTRUCTIONS:

NB: Submitting a complaint to the Bern Convention is a serious accusation against the concerned Contracting Party(ies). Complaints must demonstrate a sufficient degree of seriousness or urgency related to species or habitats of European importance, and the complainant must demonstrate that the issue has already been raised at local and/or national level.

Complaint forms must be submitted in electronic word format, in English or French, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis. Anonymous complaints are not admissible; however the Secretariat will take measures to keep the personal details of the complainant confidential.

Please, fill in this form and send it to the attention of:

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On behalf of : (1) Dighomi Meadows Initiative (2) CEE Bankwatch Network (3) Social Justice Center - EMC

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Date: 25.08.2026

Electronic Signature

1. Please state the reason of your complaint (refer also to the Contracting Party/ies involved and the Articles of the Convention which might be violated)

The Government of Georgia and Tbilisi City Municipality have repeatedly violated their obligations under Articles 4 and 6 of the Bern Convention regarding the Emerald Network-protected area (PA) - Tbilisi Otter Island (GE0000048), by neglecting the surrounding territory, permitting illegal resource extraction, tolerating the years-long construction waste dumping, refusing to clear it, and ultimately by subdividing the land and sanctioning stadium construction. **Dighomi Meadows, Tbilisi's last surviving riparian floodplain forest**, covers ~190ha on the right bank of the Mtkvari (Kura) River (up to 70 ha historically consisting of riparian forest), **along a bird migration route**. It surrounds and sustains 12,8ha Tbilisi Otter Island (See Annex 1). Since 2015, unregulated rock extraction, on-site processing and illegal waste dumping, largely unaddressed by authorities despite repeated notifications, have degraded the area (See Annex 2). By 2024 only ~8ha of original forest remained. The most recent threat is a stadium built 400-450 meters from Otter Island, within the Meadows, approved through a rushed, formalistic administrative process that ignored the ecological significance of the PA and the Meadows itself (see Annex 3). A private developer's interest in June 2025 triggered rapid land transfer, rezoning, and a 20-year lease for a stadium. Construction began in February 2026 and had already exceeded its permitted boundary by May 2026, dumping waste into protected turtle and bird habitat and destroying ~9,000 m² of extra vegetation (Violation of Article 6). **Administrative decisions concerning the stadium's construction directly contradict existing national policy documents on the protection of the Dighomi floodplain:** The Otter Island Management Plan calls for extending the Emerald Network site's boundary to incorporate the remaining riverbank floodplain forest, since the island alone cannot sustain its dependent species without the adjoining forest fragments. It also calls for granting the Dighomi floodplain "protected forest" status under the Forest Code, citing nationally red-listed tree species (*Ulmus minor*, *Juglans regia*, *Acer ibericum*) and the dominant floodplain poplar (*Populus canescens*) (pp.31–32). The Floodplain Rehabilitation Strategy calls for barring any further fragmentation and construction unless essential and expert-recommended (p.53). The Guidelines for Managing Forest Habitats on Georgia's Emerald Sites recommend delineating core conservation areas and buffer zones for habitat protection (p.26). We urge the Standing Committee of Bern Convention to ensure that the Georgian Government and Tbilisi Municipality immediately take measures to halt construction and prevent any further development in the Meadows, commence its restoration in accordance with the Restoration Strategy, and approve and implement the Emerald Site Management Plan. We also urge the Committee to engage with the Asian Development Bank, which has financed the Rehabilitation Strategy, to ensure restoration efforts in alignment with the two sites protection requirements and the ADB-funded strategy.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention that are potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

At least 45 species recorded in the Dighomi Meadows are listed in Appendix II. **Birds (18):** Based on field observations carried out in 2024, a total of 95 bird species have been recorded (up to ~120 expected with further survey effort). The majority of these species use the meadows as a stopover, resting, or foraging habitat during migration or seasonal movements. Several species breed there. Among the recorded avifauna 18 are Appendix II species: *Ixobrychus minutus*, *Nycticorax nycticorax*, *Egretta garzetta*, *Ardea purpurea*, *Pernis apivorus*, *Milvus migrans*, *Circus aeruginosus*, *Accipiter brevipes*, *Accipiter nisus*, *Buteo rufinus*, *Hieraaetus pennatus*, *Falco tinnunculus*, *Falco subbuteo*, *Falco peregrinus*, *Alcedo atthis*, *Merops apiaster*, *Coracias garrulus*, and *Upupa epops* (See Annex 4). **Mammals (21):** 19 bat species, as well as *Sciurus anomalus* and *Lutra lutra* are to be known as having inhabited the area. Recent ADB supported surveys documented traces of *Lutra lutra* (Oct–Nov 2020) and 8 Appendix II bat species (Jul–Aug 2021): *Rhinolophus ferrumequinum*; *Nyctalus noctula*; *Nyctalus leisleri*; *Nyctalus lasiopterus*; *Pipistrellus pygmaeus*; *Pipistrellus kuhlii* or *nathusii*; *Eptesicus serotinus*; *Vespertilio murinus*. The same document also said **Reptiles (5)**–*Testudo graeca* (IUCN VU), *Emys orbicularis* (NT), *Mauremys caspica*, *Natrix tessellata*, *Telescopus fallax* – also inhabit the area.

3. What might be the negative effects for the specie/s or habitat/s concerned?

Birds: Ongoing construction and associated habitat destruction are already reducing and fragmenting Dighomi Meadows's remaining natural habitats. Vegetation removal, wetland drainage, noise, heavy machinery, and continuous human disturbance are likely diminishing the site's suitability for nesting, breeding, feeding, and resting birds. Such impacts are particularly concerning during the breeding season, when disturbance may lead to nest abandonment, reduced breeding success, and displacement of sensitive species. **Turtles:** The ponds provide essential habitat for *Emys orbicularis*, *Mauremys caspica* and *Testudo graeca*. Filling one pond with construction waste destroyed a breeding and resting site and likely buried animals in it, as these low-mobility species cannot relocate ahead of machinery. **Bats:** Infilling the ponds removes the aquatic insects bats feed on, while noise and light pollution threaten to disturb their habitat further. **Otters:** Among the most disturbance-sensitive, construction noise, vibration and permanent human presence risks to displace otters from foraging areas near the riverbank.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald Network, UNESCO site? Are there pending procedures within another international institution?

Tbilisi Otter Island (GE0000048) is an officially adopted Emerald Network site, listed for 7 species and 3 habitats (G1.3 C3.62 C3.55.), managed by Tbilisi Municipality. As Dighomi Meadows forms part of its ecological corridor, destroying Meadows would also undermine the site's ability to sustain the island's species and habitats. By allowing continuous destruction of the area, Georgia also violates Convention on Migratory Species (CMS), EUROBATS, and AEW, as well as CBD's Kunming-Montreal Targets 2 and 12. Further, under Chapter 26 of the EU-Georgia Association Agreement, Georgia committed to approximating its law with the Habitats Directive (92/43/EEC) by 2021, obliging the country to apply the Directive's Article 6 requirements: appropriate assessment (AA) for projects with significant impact and public consultations where relevant. Georgia's own national guidelines state intention to convert Emerald sites into Natura 2000 as EU integration progresses. The authorization of stadium construction adjacent to the Otter Island Emerald site without AA of its impact on its habitat and otter and bird populations thus breaches Bern Convention and the Association Agreement commitments. This failure is particularly significant given that Georgia has an official site Management Plan (2024–2034) which should have formed the baseline against which any proposed development was assessed before authorization was granted. There are currently no pending procedures under any other international institution.

5. Have you attempted to address this issue with the relevant local and national authorities? Please describe. Are there any pending procedures at national level regarding the object of your complaint?

To protect Dighomi Meadows, the local community has taken every measure available, including by challenging nearly every administrative decision, as well as instances of inaction by municipal bodies, either in court or before administrative authorities at municipal and national level (see Annex 5 for the detailed list of actions).

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc) (for large files, please add a separate annex document, as mentioned in the above instructions).

No EIA or AA was prepared for the stadium project currently underway. See annex 1-6.

Annex 1: Map of Dighomi Meadows and Tbilisi Otter Island (GE0000048)



The map shows Tbilisi Otter Island **in purple** and the approximate area of Dighomi Meadows **in red**.
Photo: Google earth: 28.10.2025

Annex 2: Gradual destruction of Dighomi Meadows. Satellite images: October 2010, June 2015, July 2020, October 2025. Source: Google Earth.

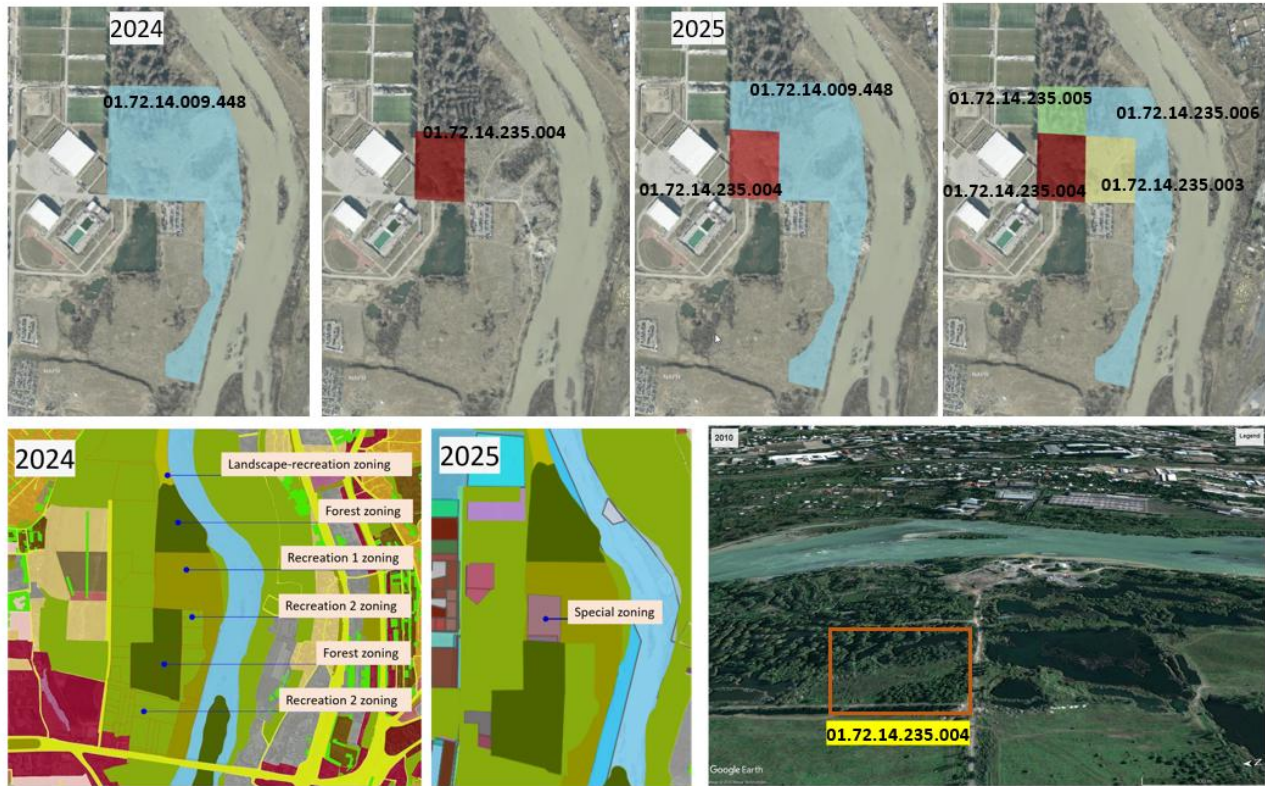


Annex 3: Timeline of Stadium Authorization and Construction Activities.

The most recent threat related to the biodiversity of the Dighomi floodplain and the Emerald Network-protected habitats and species, is the construction of a stadium and associated infrastructure approximately 400-450 meters from Otter Island, following an accelerated and largely formalistic administrative process in which the ecological significance of the adjacent protected floodplain was not meaningfully considered at any stage; after a private company expressed interest in the site on June 10, 2025, the National Agency of State Property requested transfer of the relevant parcel from Tbilisi Municipality the same day; the municipality proceeded to subdivide the land, transferred the final 26,331 sq m parcel (N01.72.14.235.004) to the state on June 26, 2025, and, by Government Order No. 1139 of July 14, 2025, the National Agency of State Property was instructed to conclude a 20-year superficies agreement with "Sport Club Athletic" LLC ("Company"), which was signed that same day, granting the company possession of the plot until 2046. To enable construction, the municipality further rezoned the site from Recreational Zone-1 (permits only minimal infrastructure (e.g.: lighting, paths)) to Special Zone-1 (allows educational, medical, infrastructure, and warehousing development) through an expedited process, a council resolution passed the day after the mayor's proposal was submitted (October 23–24, 2025), and issued a construction permit on April 27, 2026, with completion required by April 27, 2028.

The Company began stadium construction in February 2026, involving tree felling. In May 2026, the company exceeded its approved boundary, discharging inert waste into nearby forest and pond — habitat for protected turtles and a foraging area for protected birds. This damaged a further ~9,000 m² of vegetation, burying trees under rubble.

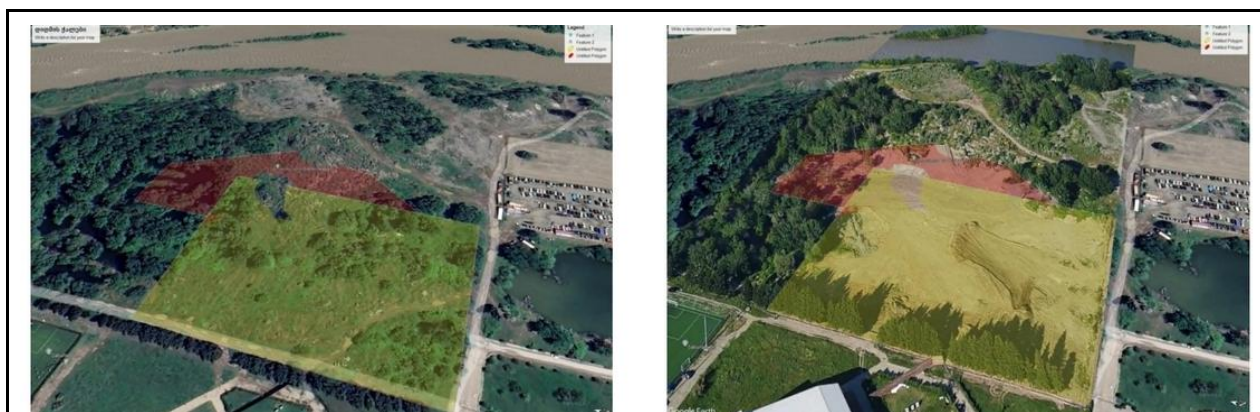
Annex 3.1. Maps tracing the fragmentation and rezoning of part of Dighomi Meadows



Annex 3.2. Damage to Dighomi Meadows from Stadium Construction



Buried floodplain forest, beyond the stadium's designated construction area.



The area marked in **yellow** indicates the 2.6 ha stadium construction zone. The area marked in **red** indicates an additional 0.9 ha outside the approved construction zone that has been leveled by **Sport Club Athletic LLC** using construction waste. The **left image** is a Google Earth satellite image from May 2025, while the **right image** shows drone footage from June 2026 overlaid on the satellite imagery, illustrating the changes to the site.



Typical riparian pond in Dighomi Meadows (upper left), contrasted with ponds that have been filled with construction waste (remaining images).

Annex 4. Avifauna of Dighomi Meadows.

Dighomi Meadows supports a rich and diverse bird community, demonstrating the site's considerable ecological importance within the Tbilisi urban landscape. Based on field observations conducted by conservation specialist Luka Tkemaladze between February and June 2024 as part of his bachelor's thesis "Bird diversity in a degraded habitat: the case of Dighomi Meadows," a total of 95 bird species were recorded in Dighomi Meadows, with up to 120 species expected to be identified through more extensive and systematic surveys. The majority of these species have been documented to be using the meadows as a stopover, resting, or foraging habitat during migration or seasonal movements, highlighting the site's role as an important urban refuge and ecological corridor.

While many species have been observed only occasionally or during migration, several species (Kingfisher, Little bittern, Night heron) depend on Dighomi Meadows as an important breeding and feeding habitat. The mosaic of wetlands, riparian vegetation, open grasslands, and shrub habitats provides nesting opportunities, abundant food resources, and shelter for resident and migratory birds alike. The loss or degradation of these habitats would therefore affect not only local breeding populations but also migratory species relying on the site during critical periods of their annual life cycle.

Among the recorded avifauna are numerous species protected under the Bern Convention, of which 18 species are listed in Appendix II (Strictly Protected Fauna Species) of the Bern Convention. The occurrence of these strictly protected species demonstrates the international conservation value of Dighomi Meadows and the importance of preserving its habitats from ongoing degradation.

The ongoing construction activities and associated habitat destruction are already reducing and fragmenting the remaining natural habitats within Dighomi Meadows. The removal of vegetation, drainage of wetland areas, increased noise, heavy machinery, and continuous human disturbance are likely to diminish the site's suitability for breeding, feeding, and resting birds. Such impacts are particularly concerning during the breeding season, when disturbance may lead to nest abandonment, reduced breeding success, and displacement of sensitive species.

Given the documented diversity of 95 recorded bird species, including numerous species protected under the Bern Convention, we consider the continued degradation of Dighomi Meadows to pose a significant threat to the conservation status of the site's avifauna.

Annex 4.1. Detailed list of recorded bird species in 2024 during fieldwork by conservation specialist Luka Tkemaladze

Annex 4.2. Some Species photographed at Dighomi Meadows

		
Common Kingfisher	Purple Heron	Caspian turtle

Annex 5. Legal Actions by the Community to Protect Dighomi Meadows

On 4 March 2026, the 25 December 2025 order approving the construction-use conditions for the land plot for stadium purposes was appealed to the superior administrative authority. On 15 May 2026, the same authority's 27 April 2026 order approving the architectural project and issuing the construction permit was likewise appealed to the superior administrative authority.

In addition, on 2nd of March 2026, the following administrative decisions were challenged before the Tbilisi City Court:

- (a) the Tbilisi Municipality Government's 26 June, 2025 order transferring into State ownership the land plot on which stadium construction is currently underway;
- (b) the Government of Georgia's 14 July 2025 order granting consent for the transfer of the disputed land plot to the company;

(c) the Tbilisi Municipality Government's 23 October 2025 order approving a recreational functional zone for the land plot;

(d) the Tbilisi Municipality's 24 October 2025 decision amending the "Capital's Land Use General Plan" and formalizing the change of functional zone for the land plot.

Dighomi Meadows Initiative also wrote, on 12 June 2026, to the Ministry of Environmental Protection and Agriculture and to Tbilisi Municipality's Municipal Environmental Protection Service, seeking a response to the significant ecological damage caused to the surrounding area by the company's handling of construction waste.

Beyond challenging these recent administrative decisions, residents have also challenged the inaction of City Hall bodies, reflected in their refusal to clean up floodplain forest contaminated by construction waste. By a decision of 20 November 2024, sent to the claimant nearly a year later, on 15 October 2025, the Tbilisi City Court partially upheld Ana Trapaidze's claim and ordered Tbilisi City Hall to remove construction and inert material from the Dighomi Meadows and to clean up the territory. This concerned land plots owned by the Municipality, the State, and a state-owned company (LLC "Sportmshenservisi"). The Court held that the obligation to clean up littered territory within Tbilisi Municipality's boundaries, where that territory is not private property, rests with the system of Tbilisi Municipality's executive bodies. City Hall appealed the decision to the Court of Appeals.

Annex 6: Relevant Studies and Documents

Title	Date	Note
Dighomi Meadows Rehabilitation Strategy	2024	Commissioned by Tbilisi Development Fund and Tbilisi City Hall, financed by ADB [in Georgian].
Livable Cities Investment Project for Balanced Development: Dighomi Floodplains Municipal Park Updated Initial Environmental Examination	2024	Prepared by the Tbilisi Development Fund, Tbilisi City Hall, Government of Georgia for the Asian Development Bank (ADB) [in English]. Construction of a municipal park was considered in the Dighomi Meadows area under ADB's loan Livable Cities Investment Project for Balanced Development. Its design and proximity to Tbilisi Otter Island raised serious concerns among the Dighomi Meadows community and defenders. Their pushback led to the development of the Dighomi Rehabilitation Strategy, which also considered the area inappropriate due to poor accessibility and risks of anti-social use and disturbance to wildlife, including <i>Lutra lutra</i> (p185). The park project was eventually removed from the loan program in 2025. Results of the baseline survey commissioned for the IEE of this Park project have been cited in Q2.
Managing Forest Habitats on Georgia's Emerald Sites	2024	Prepared by the World Bank, with financial support from the European Union under the EU for Environment Action (EU4Environment), reviewed and commented on by representatives of MEPA [in English].
Tbilisi Otter Island Management Plan	2023	Commissioned by Georgia's Ministry of Environmental Protection and Agriculture (MEPA), financed by SiDA [in Georgian].
Dighomi Meadows: on the Brink of Ecological Catastrophe, and a Way Forward	2021	Prepared by activists, with the financial support of Open Society Foundation [in Georgian].
The Tragedy Of Dighomi Meadows	2020	A photo essay by Seb Higginson documenting the environmental destruction of Dighomi Meadows, including illegal resource extraction and construction-waste dumping, the resulting loss of wetlands, forests and biodiversity, and the efforts of local residents to protect and restore the area.