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Ukraine War Environmental Consequences Work Group

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Dear Friends!

Russia's invasion has already threatened several animal species in Ukraine with extinction. Up to 70% of the global population of Normann's mouse has potentially been killed. After the Kakhovka hydroelectric dam's destruction, there was much talk about the disappearance of the sea zander, and the dolphin population in the Black Sea has been significantly affected. While the war continues, it is difficult to draw definitive conclusions, but it is highly likely that biodiversity in eastern and southern Ukraine has suffered enormous damage. Oleksiy Vasyliuk investigates:

• <u>Fighting for life: How Russia's war in Ukraine threatens to wipe out rare species</u>

Ecocide is taking place against the backdrop of Russia's ongoing occupation of Ukraine. Russia is pursuing strategies to "legitimize" its power, including awarding captured territories "protected area" status. That formal status does not, however, result in actual conservation efforts in these areas. Read more about how the occupation is being "legalized" in the Donetsk region through the creation of protected areas:

• Occupation disguised as conservation: Russia's 'new' nature reserve in the Donbas

The Russian government's lack of interest in environmental protection is further confirmed by its withdrawal from the Ramsar Convention on Wetlands of International Importance, as we recently reported. This move has also called into question the fate of wetlands in the occupied territories. Read our analysis to learn how Ukraine continues to methodically protect these areas and how the Ramsar Convention mechanism contributes to this:

• Ramsar wetlands under fire in Ukraine

In July, Rome hosted the 2025 Ukraine Recovery Conference, the third such conference. However, while the first conference, held in Lugano, Switzerland, was characterized by a high level of ambition, the latest one resembled a formal working meeting. Moreover, the "green" agenda is increasingly being replaced by economic and political interests, and energy and resources have become leading issues. Without a return to active discussion of sustainability principles at such conferences, Ukraine's future will be black, not green. Alexander Vorbrugg and Ievgeniia Kopytsia wrote this report on the conference in Rome:

• <u>Building back better? Fifty shades of green at the Ukraine Recovery Conference</u> 2025



Unfortunately, Ukraine's domestic political challenges are not helping nature conservation. The country has already faced the institutional crisis of unsuccessful reforms, although there have been some successes, such as the decentralization of power. However, the government continues to undertake controversial moves and make controversial decisions. Most recently, the Ministry of Environmental Protection and Natural Resources was abolished in July of this year. Its functions were folded into the new Ministry of Economy, Environment, and Agriculture. Read Inha Pavliy's article to learn why Ukrainian environmental organizations and experts consider this to be a poor and potentially dangerous decision.

• Merging ministries: Will changes in the structure of Ukraine's government roll back the environmental agenda?



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You can read more about the environmental consequences of Russia's full-scale invasion of Ukraine on our <u>website</u>, <u>Twitter (X)</u>, <u>Facebook</u>, <u>Telegram</u> and <u>Bluesky</u>.

We wish you strength, peace and good news! Alexej Ovchinnikov, editor in chief, UWEC Work Group





Fighting for life: How Russia's war in Ukraine threatens to wipe out rare species

Oleksiy Vasyliuk

Por the first time, the IUCN European Red List has officially recognized military action in Ukraine as an extinction risk factor. After three years of all-out war, UWEC asks: just how serious is the threat to Ukraine's rare species, and to what extent are population losses being overplayed by the media?

Since 2022, claims that the war has had an unprecedented impact on Ukraine's biodiversity have frequently appeared in public spaces. UWEC Work Group has reported on several occasions how military action has placed the existence of entire populations under threat. In our publications, specialists have expressed concerns about

the possible extinction of species in areas that have been worst hit by the war (for example, in the zone affected by the floodwaters of the Kakhovka Reservoir after the destruction of the hydroelectric dam).

In this article, we look at which species in Ukraine are seeing a population decline as a result of military activity and whether we can say that these species are under threat of large-scale extinction since the full-scale invasion.

Read more:

• Beyond the fog of war: deaths of the silent



- What does Russia's war in Ukraine mean for global biodiversity conservation efforts?
- Threats of Russian invasion for protected small mammals in Ukraine
- 20 plants that could disappear because of Russia's invasion of Ukraine

Since the beginning of the full-scale war, Ukrainian experts have taken part in the preparation of an updated European Red List for the International Union for Conservation of Nature (IUCN), in which military action is indicated for the first time as a factor in the deterioration of the conservation status of a number of threatened species. In particular, this concerns six species whose situation has been aggravated by the war and flooding after the dam of the Kakhovka hydropower station was blown up.

For Nordmann's birch mouse, for example, data shows that the war has placed it on the brink of extinction—up to 70% of the world's population of this species has potentially been wiped out since the destruction of the Kakhovka dam partly destroyed its biotope.

This assessment was made possible by the ongoing work of specialists in the conservation and study of the species. Although Nordmann's mouse is found in various regions of Ukraine and several other countries, the bulk of the modern population is concentrated in the active combat zone in the south of the country.

This update to the list of vanishing species has an important global context: for the first time, the consequences of the war have been cited for Europe as a factor that creates the risk of extinction for several species at once.

In the past, the IUCN has also repeatedly studied the influence of military activity, primarily civil wars in West Africa and military exercises in countries with drawnout conflicts. The 2021 IUCN report listed 219 species suffering from war, military maneuvers and destruction. Among them are "Big Five" species such as rhinos and elephants. But only a small proportion of species are considered endangered by the IUCN for military reasons. An example is the fate of gorillas in the Virunga National Park (Democratic Republic of Congo), which for many years suffered from the consequences of a never-ending civil war.

Unfortunately, the IUCN Red List website does not have a separate classifier for direct military influence, but only a general category ("6.2 – War, civil unrest & military exercises") that includes the movement of refugees and other indirect factors. In total, the database includes 441 species, 34 in connection with the Yugoslav wars of the 1990s. Military impact is considered for only a few species, primarily gorillas in the Virunga reserve. The conclusion is clear: the international red list requires significant



updating, including clarification of the factors threatening species.

The Virunga National Park in the east of the Democratic Republic of Congo is a unique example of how nature conservation can be conducted in the shadow of a long-running armed conflict. Since the end of the 1990s, park employees – specially trained and armed rangers - have been effectively engaged in a state of continuous war with rebel groups and criminal gangs that are active within the boundaries of the park. These groups control the mining of coal, illegal logging and poaching, and often use the park as a refuge. More than 200 rangers have been killed since 1996 while protecting Virunga not only as a nature site, but also as a symbol of law and order in a region where state power is weak.

It is common practice in conservation science and management that a species is considered extinct once it has not been seen for 50 years. According to the qualifiers applied to the IUCN Red List, (IUCN Red List Categories and Criteria, version 3.1), a species is considered extinct (Extinct, EX) only when there is no longer any reasonable doubt that its last representative has died and exhaustive searches of known and potential habitats during the relevant period have yielded no results.

However, it is often extremely difficult to verify the disappearance of a species. In the vast majority of cases in Ukraine, for example, natural areas known to have previously been home to populations of endangered species remain in occupied territories or in the combat zone. And scientists' access to them is often limited by minefields.

Extinct according to the media

Public organizations and professional scientists have repeatedly spoken about the extinction risk the full-scale invasion poses to some species. However, the media have often overplayed this risk by resorting to more exaggerated language, referring to the "extinction" of species instead of the "risk of extinction of local populations." One of the species whose extinction was considered most likely was the sea zander.

Sea zander

The news in 2023 of the probable extinction of the sea zander (Sander marinus) - an extremely rare fish species, found in Ukraine's marine waters - had a huge impact. The sea zander is such a rare species that it was only found every few years in the waters of the Dnipro-Buh estuary, on the salinity border between the freshwater estuary and the open sea. The huge volumes of water released by the Kakhovka disaster apparently desalinated the sea zander's entire habitat in the Dnipro-Buh estuary. Specialists from the Institute of Hydrobiology of the National Academy of Sciences of Ukraine say that this population has been lost. However,



the panic over the "loss" of the species has gradually subsided, with sightings recorded beyond the zone of influence of desalination, as well as outside Ukraine and the Black Sea.

Read more:

- Black Sea heals its wounds: 4 months after the Kakhovka catastrophe
- Two years after the Kakhovka Hydropower Plant's destruction: environmental consequences and the need for strategic decisions

Danube crested newt

A popular example is the die-off of a significant population of the Danube crested newt (Triturus dobrogicus), which inhabits the Dnipro delta. These newts were washed into the Black Sea by the floodwaters that surged downstream after the dam of the Kakhovka hydropower plant was blown up.

The inundation of floodplain areas below the Kakhovka dam and the powerful flow of water toward the Black Sea caused a mass "washout" of amphibians and reptiles that are not adapted to salt water. A well-documented example is the suffering inflicted on the unique population of the Danube crested newt (Triturus dobrogicus), listed in the Red Book of Ukraine. Hundreds of dead newts were discovered along the shores of the Odesa region and Romania, which testifies to the great damage for the population. Some newts were saved by local residents and staff of national

parks. No fewer than 149 animals were saved in total. After rehabilitation at Odesa Zoo, they were released back into the Dnipro by specialists from the Ukrainian Herpetological Society. According to observations, however, some of the surviving animals were taken home by local residents as pets, and in some cases people collected the bodies of sun-dried newts as grim "souvenirs" of this environmental catastrophe.



Photographs of dead newts on the beach and sandy spit of Tuzlivski Lymany National Nature Park have become one of the visual symbols of the destruction of nature during the Russia-Ukraine war. Source: Staroverova Olena, Tuzlivski Lymany National Nature Park

In fact, the extinction of the Danube crested newt has never been a realistic possibility, even though such remarks have appeared on social networks. However, there is a likelihood of the disappearance of a local Danube crested newt population that lived in the Dnipro delta at a great distance from its main habitat. Members of this population were found on the beaches of the Odesa region in the aftermath of the destruction of the Kakhovka hydropower station.



Sandy blind mole-rat and Nordmann's birch mouse

Following the destruction of the Kakhovka hydropower station, there were reports about the likely disappearance of Ukraine's two rarest mammals, the sandy blind mole-rat (Spalax arenarius) and Nordmann's birch mouse (Sicista loriger). The habitat of these species, which have an extremely limited distribution, is particular types of sandy and ravine landscapes, some of which were flooded as a result of the disaster. The initial estimates of losses were made based on a comparison of the latest cadastral data of locations where the mammals had been found with flooded zones identified from satellite images. According to various estimates, up to 50% of known sandy blind molerat colonies and up to 70% of the entire world population of Nordmann's birch mouse could have been destroyed.

In this particular case, we are clearly not dealing with the complete disappearance of these species. Firstly, some areas were not directly affected by the disaster, but are inaccessible due to minefields and ongoing fighting. Secondly, the estimates are based on assumptions, not on fieldwork—not a single comprehensive expedition to the remaining fragments of their habitats has yet been conducted.

These two mammals were, however, among six species for which the 2024 IUCN European Red List update named military action as a major factor in the

deterioration of their condition for the first time.

Incidentally, during a 2023 expedition, Nordmann's birch mouse <u>was found</u> in the Yelanets Steppe reserve in the Mykolaiv region, meaning that additional research may well allow us to discover new, previously unknown populations of the species and ensure their protection.

Black Sea dolphins

One of the highest-profile impacts on biodiversity as a result of the full-scale invasion was the harm it has caused to marine mammals: the Black Sea's dolphins.

The Black Sea is home to just two types of dolphin-the bottlenose dolphin and common dolphin in small numbers—as well as the harbor porpoise. In addition to fighting at sea and the destruction of the Kakhovka dam, marine mammals were also <u>harmed</u> by the <u>recent oil spill</u> in the Kerch Strait, which is the most important part of the Black Sea for cetaceans. Back in summer 2022, reports of the death of "tens of thousands" of dolphins appeared in the media, provoking an emotional reaction among both the expert community and the general public. However, estimates of the death toll varied widely, ranging from 2,000–3,000 to 50,000.

Read more:

Mass dolphin mortality in the Black
 Sea: a military perspective



According to data collected by international experts and organizations, including **ACCOBAMS** (Agreement on the Conservation of Cetaceans in the Black Sea, Mediterranean Sea and Contiguous Atlantic Area), the number of recorded dolphin bodies washed up on the shores of Bulgaria, Romania, Turkey and Ukraine exceeded 2,500 individuals by the middle of 2022. However, a number of experts believe that for every corpse washed up on the shore, between 10 and 20 remain go undocumented. Thus extrapolated, death estimates reach the tens of thousands.

Ukrainian experts, including Ivan Rusev, a researcher at the Tuzlivsky Lymany National Park, put the figure at up to 50,000 dead individuals, based on the scale of military activity and acoustic pollution. Unlike the pre-war years, when the principal cause of dolphin deaths was entrapment in fishing nets, in 2022 most of the carcasses autopsied showed signs of injuries characteristic of acoustic shock: damage to the inner ear and lungs, as well as complete disorientation.

ACCOBAMS has already <u>initiated</u> a project for year-round acoustic monitoring of the status of marine mammal populations, in which Ukraine, Romania and Bulgaria are participating.

New candidates for extinction?

That said, it is quite likely that some species have become extinct as a result of the full-scale war. Six species belonging to one of the major groups of crustaceans (Malacostraca) listed in the Red Book of Ukraine are found in the combat zone. These species are typical of both the Dnipro-Buh estuary and the Lower Dnipro floodplains.

Scientists are particularly interested in two species of gammarus (a tiny amphipod crustacean genus in the gammaridae family), Lanceogammarus andrussowi and **Shablogammarus** shablensis, both endemic to the Ponto-Caspian region, as well as Pontastacus pachypus – Europe's rarest freshwater crayfish, whose entire population outside the Caspian Sea is concentrated in the zone of influence of the Kakhovka catastrophe. There is a possibility that this species lived exclusively in the vicinity of the Kakhovka hydropower station and at the mouth of the Ingulets river, preferring rocky areas with a strong flow. Mykhailo Son, a senior research fellow at the Institute of Marine Biology at the National Academy of Sciences of Ukraine, told the Livyi Bereh newspaper in an interview that this species is sensitive to oxygen content, and its habitats could have been silted up and destroyed by pollution caused by the destruction of the dam.

In addition to these species, at least ten other freshwater organisms known to be found only in the Dnipro delta and the Dnipro-Buh estuary in Ukraine, remain in danger, since their habitat has been significantly altered. However, it will only be possible to return to the question



of the survival of these species after the liberation of the left bank of the Dnipro and the demining of all areas that have suffered from military action.

Astralagus

Astralagus visunicus (Astragalus visunicus) is a plant species with an extremely narrow habitat that may have been critically damaged by military action in Ukraine. The Vysunsko-Inguletsky Regional Landscape Park, between the village of Bereznehovat and the villages of Vysunsk and Pryshyb in the Mykolaiv region, is the only place in the world where this Astragalus species grows. It was here that Ukrainian armed forces managed to stop the Russian advance to the north. At present this is the only place previously mentioned as a probable extinction zone that is now located in liberated territory. Satellite monitoring has shown that the sites where the species has been observed remain undamaged. However, it will only be possible to carry out a detailed study once the area has been cleared of mines.

Should the status of species in the Red Book of Ukraine be changed?

For now, most experts do not have a clear answer to this question, as a decision of this kind requires long-term monitoring and information on population dynamics. Nonetheless, it is quite likely that the conservation status of species will be revised in the future.

The list of Red Book species is updated in Ukraine once every 10 years on average, with the last update taking place in 2021, when 223 new <u>taxa</u> were added. In the majority of cases, these were <u>steppe species</u>, suffering from plowing and <u>afforestation of steppeland</u>.

Today, around one-third of all species protected by the Red Book of Ukraine, regardless of category, represent steppe biotopes. It is plain that many of them will see their habitats significantly decrease in size, if they have not already shrunk. Essentially, the war has only worsened the outlook for many species that were already at risk of extinction. Another important aspect is that in wartime conditions it is impossible to take any active measures for the protection (management) of species in the combat zone.

'At risk of extinction' or 'chance of survival'?

Discussions of species under threat of extinction or a noticeable reduction in their populations as a result of military action, shelling and the destruction of infrastructure have focused on extremely rare species that require the work of specialists in the wild. As we have already established, at present it is impossible to carry out full assessments (especially in the combat zone). Most specialists we spoke to are skeptical about overdoing the topic of extinction and are fairly certain that many endangered species have not in fact disappeared (not even their Ukrainian



populations). Unfortunately, the groups of invertebrates most at risk (especially aquatic ones) have been studied too little to make detailed assessments.

The general caution shown by specialists in making statements about the risk of extinction of species is also justified by the tendency of natural biodiversity to recover rapidly in areas where active economic use has ceased. A good example is Velykyi Luh (the Great Meadow), a historic willow forest that has sprung up on the bed of the former Kakhovka Reservoir.

Read more:

Is it time to restore Velykyi Luh?

Could endangered populations actually become more abundant?

Experts dismiss talk of the extinction of species as largely exaggerated in the media. News outlets are more interested in writing a catchy article including the word "extinct" than a piece about the problems of monitoring biodiversity and the risks of species decline. A good case in point is the destruction of important habitats and protected areas. Although hundreds of square kilometers of forest burned down in the Siversky Donets river valley, it did not result in the extinction of any species of living organism. But the loss of this woodland resulted in the destruction of nesting biotopes for Ukraine's largest group of birds of prey.

Read more:

• Has the war forced eagles to alter their migration routes in Ukraine?

However, experts are now increasingly drawing attention to evidence of the opposite effect. UWEC itself has <u>published</u> such information. The vast areas of land abandoned as a result of destruction, shelling, mining and occupation are becoming a testing ground for the uncontrolled spontaneous growth vegetation. But in most cases, this concerns mass overgrowth by several species of invasive plants, rather than the restoration of wild nature. The only exception is the restoration of natural biotopes on the site of the former Kakhovka Reservoir. In all other cases, it is entirely possible that the complete overgrowth of areas by invasive plants is only worsening conditions for rare species.

Read more:

 Invasive species threat resulting from Russia's full-scale invasion of Ukraine

However, there is hope that with time the situation will alter as a result of natural changes in vegetation (successions), since most invasive flora are annual plants and can be displaced over time by perennial native species. This author recently took part in an expedition to the Tarutinska steppe in the Odesa region, with the aim of surveying parts of the reserve that were illegally plowed 10 years ago. Today





Expedition (May 2025) to the Tarutinska steppe, where the natural landscape is being restored after plowing in 2016. Source: Anna Kuzemko

they look very much like a successfully recovering steppe.

It is quite possible that wildlife will eventually recover – in one way or another – in most areas not put to economic use. However, unfortunately, this optimistic assessment does not apply to most rare species, which live in areas of very limited size, and which require specific habitat conditions. They are also quite small in number and lack external "donor" populations that can help to restore species populations through dispersal and wildlife corridor.

One positive exception appears to be the bobak marmot, or steppe marmot (Marmota bobak), whose numbers <u>have</u> <u>soared</u> in the occupied Luhansk region due to the absence of hunting. Another is, of course, renewed migrations by Danube sturgeon to the section of the Dnipro restored by the disappearance of the Kakhovka Reservoir, which we have previously <u>reported</u>. But such examples still run counter to the general trend.

What needs to be done to save Ukraine's endangered species

A pragmatic answer to the question of where to start the necessary measures to preserve rare species is to work on the development of monitoring, which in turn is also very limited in its capabilities for now. New monitoring systems/ programs should be developed using remote methods (satellite monitoring, drones, camera traps, analysis of DNA shed into species' environments (e-DNA), etc.). This kind of approach will remain



relevant for many decades, since the huge scale of mined areas will prevent biologists from beginning serious work even after the end of the war.

In addition, data collected in the prewar period needs to be collected and digitized, as well as made accessible in the public domain. For example, in one recently completed project, the Ukrainian Nature Conservation Group brought together a team of staff from reserves that are now in occupied territories. Together, they collected and published over 130,000 records of observations, mainly of rare species.

Most important of all, of course, is the creation of new nature conservation areas. Regardless of the military and political situation, it is evident that the total area of territories allocated for the conservation of rare species in Ukraine has been significantly reduced. This means that on top of the destruction caused by military action, conditions for wildlife conservation are also affected by a lack of proper protection and management. In spite of the ongoing war, documentation is now being prepared for the creation of new nature conservation areas (including in occupied parts of Ukraine). Recommendations by scientists and government bodies to significantly increase the total area of nature conservation zones have also been approved by the Verkhovna Rada

Committee on Environmental Policy and Nature Management, while committee hearings on the issue were held in October 2024. However, this initiative has little support at local level, and as yet there is no sign of new reserves being created.

Unfortunately, threats to biodiversity do not end with military action and are likely to worsen over time. A 2021 IUCN thematic report, titled "Conflict and Conservation: Nature in a Globalised World," focuses less on the impacts of warfare itself and more on the impacts of changing settlement patterns and the construction of housing and infrastructure. The mass displacement of people and post-conflict projects to rebuild infrastructure can exacerbate environmental risks. The report notes that displaced people often put pressure on natural resources near protected areas, while restoration projects often ignore the needs of nature. In many cases, the rush for a "quick recovery" and the desire to secure aid has led to the destruction of ecosystems. For this reason, the IUCN recommends integrating conservation approaches into post-war planning to avoid repeating mistakes made by other countries. •

Translated by Alastair Gill Main image: Normann's birch mouse (Sicista lorigera). Source: photo by Mykhailo Rusin





Occupation disguised as conservation: Russia's 'new' nature reserve in the Donbas

Oleksiy Vasyliuk

Russia is now seeking to use Ukrainian nature reserves as a lever in a cynical new campaign aimed at establishing political legitimacy over the territories it occupies in eastern Ukraine.

On July 1, 2025 the Russian government adopted Resolution No. 992, which declares the creation of a "new" reserve on Ukrainian territory, "Donetsk Steppe". The <u>document</u> describes the establishment of the "'Donetsk Steppe'

state nature reserve with a total of 3,044 hectares." Its territory fully encompasses the four existing Ukrainian Steppe Nature Reserve sites that are subordinated to the National Academy of Sciences of Ukraine.

In doing so, the occupation authorities have announced formal control over a Ukrainian nature conservation site created back in 1961 and located in several parts of the Donetsk region's steppe zone. In this case, the status of "reserve" — the highest



nature conservation category in Ukraine — is being used not for the protection of nature, but as a means toward political legitimization of the occupation.

What is the Ukrainian Steppe Nature Reserve and why is it important?

The Ukrainian Steppe Nature Reserve (USNR) is one of the oldest and most valuable steppe conservation institutions in Europe. It is divided into four subreserves:

- Khomutovskyi Steppe: founded in 1926, it has a total area of around 1,030 hectares and is an example of typical Azov steppe.
- Kamiani Mohyly: founded in 1927, with an area of 400 hectares, represented by outcrops of Archean rock, with unique flora and fauna, located on the border of the Donetsk and Zaporizhzhia regions.
- Kreidova Flora: created in 1988 for the preservation of <u>unique</u> chalk landscapes and relict plants, founded in 1927.
- Kalmiuske: the newest sub-reserve of the USNR, created in 2008, in an already independent Ukraine, to protect granite steppe in the valley of the Kalmius River.

All of these nature conservation areas were <u>established</u> as separate reserves

in the 1920s and have a long history of biodiversity monitoring within the system National Academy of Sciences of Ukraine (NASU). These zones comprised a total of 2,768 hectares, as stipulated in Ukrainian legislation. The creation of a unified reserve in 1961 ensured the continued scientific protection of areas of virgin steppe that had vanished from most of Ukraine. The USNR was administered by the NASU and had no relationship with government agencies or the Ministry of Environmental Protection and Natural Resources of Ukraine, remaining a model scientific site.

The USNR under Russian occupation

It is telling that the territories that Russia now solemnly declares a "reserve" have been subjected to largescale destruction by Russian troops and militias under their control.

The Kalmiuske site was directly on the frontline from 2015 to 2022 and suffered serious damage: Russian forces set up military positions right in the nature reserve's granite outcrops.

The Kreidova Flora sub-reserve has witnessed two major battles: first in 2014-2015, and then in 2022, when large parts of the chalk slopes were burned during the full-scale invasion.

The staff of the Khomutovskyi Steppe site were forced to leave the site at the beginning of the occupation in 2015. Some areas of the site were plowed up in 2016.





Russian trenches on the territory of the Kalmiuske USNR site. Source: Google Maps

That is, the very same "Donetsk Steppe" that Moscow is now trying to show off to the world is not a protected area, but a destroyed symbol of nature conservation. In fact, its destruction is a direct result of deliberate actions by the Russian occupying authorities.

A political signal: legitimacy for a military occupation

It is symptomatic that the Kremlin has been in no hurry to formally create a Russian reserve since 2014, although most USNR areas were already under Moscow's control even then. But following the full-scale invasion in 2022, and amid creeping attempts at legitimizing the annexed territories through various "reformist" initiatives, this one appeared—under the guise of nature conservation.

From the outside, everything has been formalized in line with Russian law. Russian environmental legislation stipulates that reserves can only be created on the initiative of the Russian Ministry of Natural Resources and Environment and must be subject to federal administration. Until 2025, these territories had no such status. The sole attempt at "improvisation" was the project to illegally create the so-"republic-level Khomutovskyi called Steppe-Meotyda Biosphere protected area", which appeared in 2015. This project included Kryva Spit in the Meotyda National Nature Park and the Khomutovskyi Steppe site—and had no legal force even within the framework of Russian legislation. Consequently, Russia rode roughshod over it, just as the nation treats other "clones" of nature reserve fund (NRF) institutions, viewing everything just as it was back in Soviet times.

The current decision, therefore, has nothing to do with concern for the



environment: it is about marking the territory politically. The mention in the resolution of the inclusion of the Kreidova Flora site, which is currently under Ukrainian control, is particularly disturbing. It is an open signal—not only of annexation, but also of territorial claims.

Geography and size

The official dimensions of the Donetsk Steppereserve comprises 3,044 hectares — more than is enshrined in Ukrainian legislation for the USNR (2,768 hectares).

- the boundaries of the Khomutovska Steppe and Kreidova Flora sites remain unchanged;
- the boundaries of the Kamiani Mohyly and Kalmiuske sites have been slightly expanded—parts of adjacent damaged areas have probably been added.

Weaponizing nature reserves

This is not the first time that Russia has attempted to use the status of protected areas as an element in political strategy. A similar situation recently occurred with the Black Sea Biosphere Reserve, which UWEC has covered in detail, as well as the Askania-Nova Biosphere Reserve.

Read more:

 Biosphere reserve burns at the start of the occupation administration's work Askania-Nova Biosphere Reserve captured by invaders

It is telling that Russia is trying to present even destroyed and plundered territories as "sites of environmental protection," investing these campaigns with a maximum of propaganda energy, but a minimum of content.

In particular, the mention in the resolution of the inclusion of the Kreidova Flora site—which is under Ukrainian control—is a direct infringement of Ukraine's sovereignty. This is not merely a declaration: it is the establishment of a political norm, now embedded in Russian law.

The creation of the Donetsk Steppe
"reserve" is no isolated case, but a
continuation of Russia's established tactics:
rename a Ukrainian protected area, then
present it as its own and register it in official
international databases.

As the Ukrainian Nature Conservation Group (UNCG) has already recorded on several occasions, actions like this are aimed not at preserving nature, but at legalizing the Russian presence in occupied territories through the exploitation of environmental bureaucracy.

In the case of Crimea, Russia has already submitted some Ukrainian reserves to the Protected Planet international database under new



names—Kazantipsky, Opuksky, etc.— and with <u>some success</u>: these territories were displayed in the database of the International Union for Conservation of Nature as Russian (subsequently, after an appeal by the UNCG, this deliberate inaccuracy was corrected in the international database).

Russia is thus promoting a narrative in which it is supposedly bringing nature protection to "new regions", though in reality these reserves have been damaged or destroyed as state institutions and have ceased all long-term monitoring work (and in some cases have even <u>lost part</u> of their territory). The same mechanism can now be employed with the new "Donetsk Steppe" reserve: all Russia has to do is enter it in the registers of the Russian Ministry of Natural Resources and Environment as a "federal reserve" and transfer this data to global nature conservation databases. •

Translated by Alastair Gill Main image source: uk.m.wikipedia.org Copyright: Dmytro Balkhovitin





Ramsar wetlands under fire in Ukraine

Oleksiy Vasyliuk and Eugene Simonov

t COP15, the Ramsar Convention **L** Secretariat presented unprecedented report on the impact of Russian aggression on Ukrainian wetlands. This report was prepared following the adoption of a bold anti-war resolution by a previous COP in 2022. Most of Ukraine's wetlands of international importance have been impacted, both directly and indirectly. Long-term, phased restoration plans and monitoring are necessary to restore the affected wetlands. Right before this presentation Russia withdrew from the convention, while Ukraine successfully

pushed through a resolution to continue assessing the impact of the war on Ramsar wetlands.

Russia shoots herself in the foot

The echo of Russian aggression in Ukraine could be heard throughout the 15th Conference of the Contracting Parties to the Convention on Wetlands, which took place in Victoria Falls, Zimbabwe, from July 23 to 31, 2025. On the second day of the conference, the Russian Federation's Ambassador





to Zimbabwe, Nickolai Krasilnikov announced Russia's withdrawal from the Convention due to "politicization". By leaving the Convention, Russia is canceling the international protection of 4% of all wetlands on the Ramsar List and setting an ugly precedent of politically motivated renunciation of international conservation obligations.

On July 25th Russia's TASS information agency announced that, "The Ramsar Convention names 50 wetland sites in Russia, with many of them enjoying the highest conservation status as part of nature reserves". These sites are located not only within Russia but also in Ukraine, including 15 sites in areas currently under occupation.

At the same time, leaving the Convention will result in the cancellation of 35 historically Russian international wetlands. From now on, in the context of the Convention, all international attention and the Russian Federation's commitments will be focused solely

on the Ukrainian Ramsar wetlands remaining under occupation given that Russia has no legal authority to withdraw those wetlands from the Ramsar List. This is hardly a "diplomatic victory."

Read: Russia exits Ramsar Convention on Wetlands

Resolution XIV.20 and its implementation

The effective trigger for Russia's exit was the Convention Secretariat's implementation of Resolution XIV.20 "The Ramsar Convention's response to environmental emergency in Ukraine relating to the damage of its Wetlands of international importance (Ramsar Sites) stemming from the Russian Federation's aggression", adopted in November 2022 at the previous conference of parties.

In addition to condemning the aggression and its impacts on wetlands, the COP-14 called for practical steps in assessing damage and developing mitigation plans. The Ramsar Convention List includes wetland sites where the member states pledged to "preserve their ecological character", therefore the assessment had to determine which wetlands are potentially experiencing a "change of ecological character" because of the war.

Although unprecedented and criticized by many of the Convention's signatories, this document has already gained great interest among academics studying



internationallaw. Meng Wang, are searcher from the Maastricht University, in an article dedicated to this Resolution argues that "Compared with the Montreux Record (a register within the Ramsar Convention that lists wetlands of international importance where human activities threaten to change their ecological character), the first strength of the Resolution lies in its ability to prompt the timely implementation of focused actions within the legal framework of the Ramsar Convention...as an immediate reaction to the ongoing threats posed by armed conflict."

Wang highlights that the "Resolution has brought this issue to the forefront of international discussions and prompted media coverage, public debates, and advocacy efforts, thereby creating a platform for sharing information about the environmental impact of the armed conflict.... In addition to raising awareness concerning the environmental emergency in Ukrainian Ramsar Sites, this cooperation has also facilitated the acquisition of expertise and technical support from other institutions."

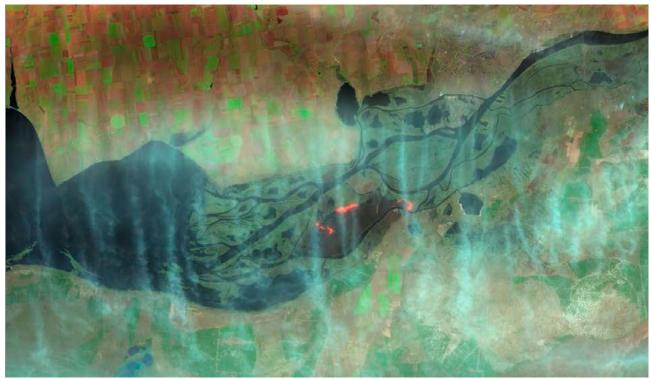
Following the events of 2022, the Ramsar Secretariat's activities under Resolution XIV.20 primarily focused on assessing the impact of the war on Ramsar wetlands. The Secretariat participated in the Inter-Agency Coordination Group on Environmental Assessments for Ukraine, which in 2025 became part of the <u>UGRP</u> (Platform for Action on the Green Recovery of Ukraine).

On March 10, 2023, Ukraine submitted a notification to the Ramsar Secretariat

regarding changes to the ecological character of 16 occupied Ramsar Sites and potential changes to the ecological character of an additional 15 sites near the frontline. On April 4, 2023, the Ramsar Secretariat met with the Permanent Mission of Ukraine to the UN Office and other intergovernmental organizations in Geneva. The meeting was held to exchange information on the severity and scope of the damage and to explore strategies and measures for mitigating the potential negative impacts on these sites and ensuring their long-term ecological integrity.

conduct the "Assessment Environmental Damage to Ukraine's Ramsar Sites Resulting from the Russian Federation's Invasion of Ukraine", the Secretariat hired a team of three international expert consultants and one national expert. From March to September 2024, the implementation phase included a literature review, specific remote sensing analysis, and ten days of field assessments in Ukraine from May 26 to June 5, 2024. Due to security threats, no sites located in occupied areas or in the vicinity of the frontline were visited. During the mission, the consultants visited six wetlands of international importance. During each visit, consultants observed a range of conflictrelated impacts firsthand. To quantify the intensity of the impacts on individual wetlands, the consultancy team collected qualitative data from wetland





Fires in the Dnipro river delta in Kherson Oblast 20.03.2022. Source: Ramsar Assessment Report, imagery by ESA-Sentinel

managers through a workshop in Kyiv on May 31, 2024, and surveys. The United Kingdom and the United States financed this assessment work.

Several intermediate reports have been discussed at periodic meetings of the Standing Committee of the Convention and the "Assessment Report of environmental damage on Wetlands of International Importance in Ukraine stemming from the Russian Federation's aggression" was finalized in January 2025 and presented to the COP 15 on July 25, 2025.

After the report was presented, the Ukrainian representative, **Olesya Petrovych**, expressed appreciation for the work and requested that the contracting parties support extending Resolution XIV.20, which relates to the

damage to Ukraine's wetlands caused by Russia's aggression. She also noted that Volodimir Vorovka, a Ukrainian scientist who contributed to the listing of ten Wetlands of International Importance (Ramsar Sites), was kidnapped by occupation forces in 2022 and remains imprisoned in Russia and called for his immediate release. The representative of Indonesia called for a global wetland restoration fund to support Ukraine and other sites impacted by conflicts.

Ramsar Report Findings

The assessment report notes that data on the impact of Russian aggression on wetlands of international importance is generally quite limited. The most available data relates to direct impacts, such as the presence or absence of



Change of the ecological character of the wetlands of international importance in Ukraine. Source: Ramsar <u>Assessment Report</u>

hostilities or bombing, military training, the number and extent of fires, the likelihood of landmines, changes in the hydrological regime, movement of heavy military vehicles and equipment, construction of trenches and defensive structures, incidents of fuel, chemical, and household sewage or garbage pollution, and use of ecosystem services or bans on their use.

Five types of impacts—fire, flooding, water regime, water quality and military infrastructure—could be investigated using remote sensing from open-source datasets and analyses. For thirteen out of the fifty Ukrainian wetlands of international importance, relevant impacts were confirmed with high

confidence using remote sensing data. For instance, the study showed that military infrastructure, such as trenches, roads and training grounds, has been built in the immediate vicinity of some wetlands of international importance.

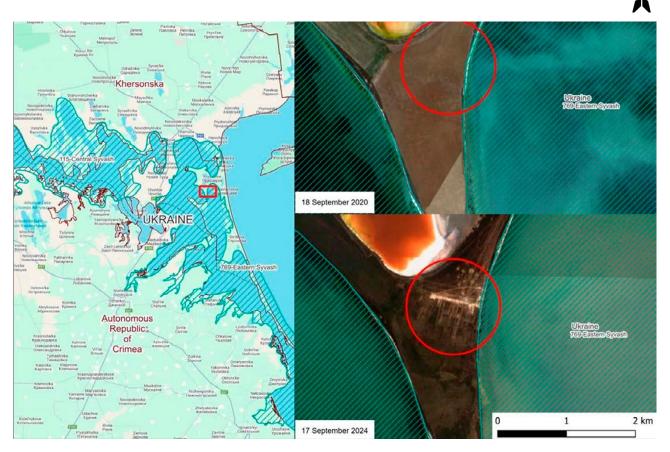
Due to the nature of wetlands, changes in hydrological regimes caused by events directly or indirectly related to Russian aggression were identified as the primary factor in changes to ecological character.

Four sites (Molochnyi Liman, Velyki and Mali Kuchugury Archipelago, Sim Maiakiv Floodplain and the Dnipro River Delta) were assessed as having experienced a "major change in ecological character" as the data indicated a significant impact on all



Ecological character change in Ukraine's 50 wetlands of international importance. (Source: Ramsar report)

| Nature | Change in | Characterization of | Example of | Number of |
|----------|------------|---------------------|------------------|-----------|
| ofimpact | ecological | impact | change in | Sites |
| | character | | ecological | |
| | | | character | |
| Direct | Major | Significant impacts | Fundamental | 4 |
| | | on all components | change in | |
| | | of the ecological | hydrology | |
| | | character of the | resulting in the | |
| | | site | elimination of | |
| | | | the wetland | |
| | | | ecosystem, and | |
| | | | its associated | |
| | | | ecosystem | |
| | | | services | |
| Direct | Moderate | Some significant | Occasional | 27 |
| | | impacts on some | shelling, | |
| | | components | troop and | |
| | | of ecological | military vehicle | |
| | | character | movements, | |
| | | | military | |
| | | | construction, | |
| | | | etc. | |
| Indirect | Minor | Reduction in site | Reduction | 17 |
| | | management staff | in access to | |
| | | capacity, funding, | ecological | |
| | | equipment or | services, such | |
| | | reduced access to | as local tourism | |
| | | some ecosystem | and recreation, | |
| | | services | reeds mowing | |
| | | | or fishing. | |
| None | None | No change | - | 2 |
| | | in ecological | | |
| | | character | | |



Military training ground close to the Eastern Syvash. Source: Ramsar <u>Assessment Report</u> (imagery by ESA-Sentinel)

ecosystem components, particularly the hydrological regime. Three of those sites experienced dramatic changes in ecosystem conditions, such as land drying up and new inundated areas following the breach of the Kakhovka Dam. These changes were clearly visible in satellite photos and severely disrupted ecological functions and services.

Twenty-seven sites where a fairly strong impact on ecological components, processes, or services was noted are associated with military or defensive actions or a change in the hydrological regime resulting from hostilities, and are classified as sites where a "moderate change in ecological character" occurred.

The impact on sites outside the zone of occupation or military hostilities largely relates to indirect impacts. These include reduced management capacity and funding, as well as reduced access to some ecosystem services. In such cases, it was determined that a "minor change of the ecological character" occurred. The analysis showed that 17 sites were affected in this way. Only two sites, with a total area of 300 hectares, were unaffected.

Thus, of Ukraine's 50 wetlands of international importance that cover a total area of 930,000 hectares, 48 have been directly or indirectly impacted by the war. The types of impacts from the war, as well as the resulting degree of change in the ecological character of



wetlands of international importance, are summarized in the table below.

Mitigation and restoration planning

The assessment report recommends creating a wetland restoration plan for each affected Ramsar wetland and suggests the order and specifics of immediate, short-, medium-, and long-term remediation activities.

Immediate actions that could be implemented while the war is ongoing include enhancing the use of remote sensing to monitor damage and changes in wetland ecosystems, supporting and encouraging remaining management staff to monitor and document training and resourcing impacts, local authority and community rapidresponse/containment teams address immediate pollution risks with containment barriers, and providing equipment and training for water and soil quality testing and wildlife assessments.

While developing wetland restoration plans, the optimal sequencing of restoration activities must be determined in consultation with local experts to minimize unnecessary damage to biodiversity. Priority should be given to removing explosives, waste, and debris, as well as restoring the hydrology of the wetlands, especially where ditches and channels have been constructed for military purposes.

Many impacted wetlands, particularly large ones, will require significant effort, funding, and resources for remediation. The report suggests that these activities may require moving heavy machinery and people into the wetlands to perform various tasks, such as excavating and transporting contaminated soil sediment, demining, and removing unexploded ordnance (UXO) and military waste. These activities have the potential to further damage natural ecosystems, so they should be carried out using a phased approach. Ramsar experts suggest dividing wetland sites into smaller lots and demining and remediating each lot separately over several years. While remediation is underway in designated zones at one site, similar activities should be prohibited in nearby wetlands to allow for the establishment of alternative colonies, foraging areas, and wintering grounds. Remediation activities should be carried out during seasons of low biological activity, preferably winter, to minimize stress at a given site.

UWEC experts reviewing these recommendations have expressed reasonable doubt that the removal of contaminated soil and sediments is a priority approach beyond areas where their presence poses an immediate threat to human health, and furthermore that this cannot be accomplished through situ remediation measures (e.g., phytoremediation). wetlands, For removal of substrate (including





The Kamyshevakha river, 2021, into which water was pumped from the Zolote mine. The Kamyshevakha feeds into the Luhan, the Luhan into the Siverskyi Donets, the Siverskyi Donets into the Don, and the Don into the Sea of Azov. Source: BBC

contaminated sediments) can lead to even more catastrophic consequences—destruction of the hydrological regime and loss of silt accumulated over many decades, which serves as habitat for many invertebrates, which in turn are the food base of birds—focus of protection under the Ramsar Convention.

The Ramsar report also brings up the example of "delayed action" at heavily mined areas in northern France that were designated as nature reserves and classified as no-go zones ("zones rouges").

Read more: <u>Future of munitions-damaged Ukrainian lands</u>

Wetland restoration plans may include measures such as decontaminating polluted sites, establishing new buffer zones, reintroducing endangered species and improving vegetation management. However, these actions must consider the severe risks posed by remaining pollution and explosives.

The report acknowledges that the objectives and activities of restoration plans differ significantly according to site-specific conditions and wetland ecosystem types, including coastal, deltaic, floodplain, and inland wetlands.

includes separate a recommendations for wetlands on the border with Belarus. There, the hydrological regime of peatlands and wildlife migration has been impacted by the construction of defensive structures on both sides (e.g., Shatsk Lakes, Prypiat River Floodplain, Perebrody Peatlands, and Polesye Mires). The authors of the report note that "the possibility of restoring these wetlands, which should be undertaken on both sides of the border, will depend on



the political situation and the normalization of nature conservation co-operation between the two states, which was quite active before Russian aggression began."

Read more: <u>Protected</u> areas and border zones in <u>Ukraine</u>: <u>How to</u> harmonize them?

The Ramsar report discusses the fate of Velyki and Mali Kuchugury Archipelago, former islands in Kakhovka Reservoir and now the driest part of its exposed bottom. While the Ukrainian government pledged to rebuild the reservoir, the report notes that this may not be the best

option for wetland restoration. Despite the dramatic change in the area's ecology, the report acknowledges that the Kakhovka Reservoir's base is a historical floodplain for the Dnipro River. Several Ukrainian scientists argue that it may have even greater ecological value as a single, large wetland.

The authors of the Ramsar report strongly emphasize that the "European Water Framework Directive and the recent EU Nature Restoration Law encourages member states to restore nature, including watercourses, and remove barriers such as dams wherever



3 June 2023 - Just before the dam was destroyed



20 June 2023 – 1 Day after the dam was destroyed



30 July 2023 - 2 months after the dam was destroyed



24 June 2024 - 1 Year after the dam was destroyed

Changes in two Ramsar sites after the Kakhovka dam destruction. Source: Ramsar Assessment Report

possible. Accordingly, the restoration of the Dnipro River floodplain (historically known as the "Great Meadow") could become one of the largest wetland restoration projects not only in Ukraine, but also in Europe".

Read more: Two years after the Kakhovka Hydropower Plant's destruction: environmental consequences and the need for strategic decisions

Fate of Wetland Communities

The Ramsar report emphasizes that remediation measures should aim to



restore ecosystem services, allowing communities to recover socially, economically, and in terms of health and well-being. Essential wetland ecosystem services, such as food provision and water purification, must be restored for local populations. To create more resilient communities around wetlands rebuild livelihoods, the report provides several preliminary recommendations.

"Assessment Report recommendations for resilient communities"

- I. Ecotourism development: ecotourism Investment in infrastructure, such trails. birdwatching platforms, and visitor centers, can generate additional for local income communities. The return of domestic tourism is crucial for ensuring the well-being of communities, but new tourism regulations may be necessary for security reasons and to ensure the ecological recovery of wetland sites.
- II. Sustainable Fishing and Agriculture: Training in sustainable techniques and access to alternative livelihoods, such as aquaculture, should be provided.

III. Crafts and Local Production: Supporting traditional crafts like reed weaving and other wetlandbased industries could provide income while preserving local cultural practices.

- IV. Capacity Building and Education: Enhance education in sustainable land use practices and wetland conservation to promote long-term stewardship opportunities.
- V. Access to Financing: Provide microfinance programs or grants for green businesses and sustainable development projects.
- VI. Job Creation in Conservation Work: Employ local people in the conservation and restoration of impacted wetlands. Include roles in habitat management, monitoring, and tourist guiding.
- VII. Community Participation in Decision-Making: Engaging communities in post-war reconstruction and wetland management.

VIII. Food and Water Security: Wetlands often provide essential ecosystem services, such as water purification and food resources. Restoring these functions quickly can help prevent food and water insecurity during the recovery phase.

IX. Health and Well-Being Support: Mental Health and Trauma Care: Post-war recovery for affected communities should consider the mental health impact of the conflict. Programs that promote healing and well-being are essential for rebuilding resilient communities.





Estonian representative Hanno Zingel. Photo: Anastasia Rodopoulou/ENB-IISD

Thus, the report emphasizes the central idea of the Ramsar Convention: the long-term resilience of Ramsar wetlands is based on the local population's practice of "wise use of wetlands".

Read more: After the deluge: Life on the banks of the Kakhovka Reservoir now the water is gone

Ukraine's Success at COP 15

On July 28, Ukraine requested that the assessment work continue since ongoing Russian aggression continues to damage wetlands. The country presented a relevant draft resolution (COP 15 Doc. 23.26), which calls for additional wetland monitoring activities.

On behalf of 40 co-sponsors, Estonia emphasized the need to address environmental degradation during armed conflict. They stressed that, since the adoption of Resolution XIV.20, the consequences for people, biodiversity and ecosystems in Ukraine—including wetlands of international importance have worsened.

China, Cuba, Indonesia, Iran and Venezuela stated that the COP should focus on scientific and technical issues because there are more appropriate forums for discussing political issues. China added that discussing highly politicized issues may distract from the core task at hand and requested that the COP retain its focus on shared conservation goals.

On the last day of COP 15, the fate of COP 15 Doc. 23.26 was decided by a secret vote. The resolution was adopted after 46 countries voted in favor of it, 11





Tableau in the COP 15 hall showing the voting results for the Resolution 23.26 "On extension of implementation of the Resolution XIV.20 'The Ramsar Convention's response to environmental emergency in Ukraine relating to the damage of its Wetlands of International Importance (Ramsar Sites) stemming from the Russian Federation's aggression'". Photo: Anastasia Rodopoulou / ENB-IISD

voted against it, and the rest abstained from voting. (There are 171 Contracting Parties of the Convention, not including the Russian Federation which has denounced it and Saudi Arabia which just announced its accession.)

Conclusion

The first effort by the Ramsar Convention to assess the consequences of Russian aggression on Ukrainian wetlands revealed that 96% of these wetlands have been affected by the war, with over half experiencing direct detrimental impacts. Affected wetlands span nearly 1 million hectares. An

additional 10 million hectares of wetlands lost Ramsar protection in Russia after the government demonstrated its discontent with the Convention's assessment activities in Ukraine in the most extravagant and barbarous way.

The Ramsar report provides detailed recommendations for wetland restoration planning and calls for the restoration of community livelihoods living around the affected wetlands. The assessment emphasizes the necessity of a long-term, comprehensive environmental monitoring program to accurately determine the extent of the damage inflicted on Ukraine's Wetlands of





COP 15 concluded with ritual dancing, expressing joy and hope for the future of wetlands. Photo: Anastasia Rodopoulou/ENB-IISD

International Importance by the Russian invasion.

Discussions on the new Ukrainian resolution, the scope of which is strictly limited to the continuation of assessment work, as well as other similar proposals made by other parties during COP-15, have shown that a growing number of Convention parties are uneasy with bringing such controversial matters to the

"technical forum on nature conservation." Nevertheless, the resolution was adopted by a majority vote and will allow for the continued improvement of monitoring and assessing war damage to wetlands under the auspices of the Ramsar Convention. •

Main image: Olesya Petrovych, representative of Ukraine at Ramsar COP 15. Photo: Anastasia Rodopoulou/ENB-IISD





Building back better? Fifty shades of green at the Ukraine Recovery Conference 2025

Alexander Vorbrugg, Ievgeniia Kopytsia

A sukraine battles Russian aggression, the Ukraine Recovery Conference (URC) 2025 highlighted the country's ongoing efforts in reconstruction, green transition, and EU integration. However, environmental concerns were largely sidelined in favor of economic and energy priorities, raising critical questions about Ukraine's green recovery and its balancing act between urgent reforms and environmental responsibility.

This Ukraine year's Recovery Conference (URC 2025), held in Rome on July 10-11, was the largest to date, hosting around 6,000 participants. The annual high-level political event both reflects on and aims to spur political and economic activities through the lenses of resilience and recovery. Following "whole society" participatory approach, the conference seeks to bring together "governments, international



organizations, financial institutions, businesses, regions, municipalities and civil society". Featuring heads of state and other political celebrities, signals of confidence, opportunities for collaboration, and programs announced during the event have received wide attention, with some of the reporting highlighting the social and environmental dimensions of Ukraine's recovery (see, for example, Prismag's coverage of the URC 2025).

Read about past URCs:

- Environmentalists critique
 Ukraine's reconstruction plan
 (2022)
- <u>URC23 Review: Ukraine offers</u> <u>investment opportunities</u>
- <u>Ukraine Recovery Conference 2024:</u>
 <u>What were the key environmental takeaways?</u>

Across two intense days and over 50 different sessions, panels, and side events, URC 2025 showcased an extraordinary diversity of actors and interests, making the difficult to summarize. event However, the following points reflect some of the general sense over many speeches and discussions. As Russian aggression continues, including a record wave of missile and drone attacks during the event itself, it is difficult to anticipate the war's end, and adaptation to these circumstances is imperative. Under these conditions, resilience has become a

leitmotif, sidelining conversations about recovery. EU accession is no longer a question; it is underway. With careful decision-making, the current situation, as painful as it is, provides opportunities for reforms, green transition and investment. The latter reflects a specific political and economic pragmatism that could be sensed during presentations and debates. At the same time, the scale of unmet reconstruction and recovery needs remains huge, and continued political action and investments are needed to keep Ukraine afloat. Environmental challenges stand beside many other challenges. So what role did environmental issues play during this year's URC?

Role of environmental issues in Ukraine's recovery plans

Environmental issues were addressed to various extents during panels and side events dedicated to topics including energy, municipal recovery projects, and agriculture. However, they were not a cross-cutting theme and were hardly mentioned by high-level political representatives in opening speeches. In this respect, the URC 2025 did not live up to the Lugano Principles, announced at URC 2022, which listed sustainability as a guiding principle. Decarbonization and progressive environmental legislation addressed were most consistently within the framework of EU accession, particularly regarding adaptation to EU



standards and alignment with the EU Green Deal. Then-Minister of Energy German Galushchenko spoke of "our decarbonization targets, our integration goals" as if these were two sides of the same coin. The <u>Ukraine Green Recovery</u> draft law was a frequently cited example of reforms underway. It aligns recovery with the transition to a "green economy" and the <u>EU taxonomy for sustainable</u> activities.

"Environmental Α panel on Restoration" the sole session was fully dedicated to the environment. It brought together experts and officials, including Svitlana Hrynchuk, then-Minister of Environmental Protection and Natural Resources, participating online, and Margot Wallström, co-chair of the High-Level Working Group on the Environmental Consequences of the War, to address a broad spectrum of issues from environmental damage, health impacts, and green legislation to ecosystem recovery, demining, and green investment. Initiatives such as the <u>Green Recovery Platform</u> were presented as vehicles for advancing these challenges. Despite raising important points and some strong statements, the Ukrainian Minister of the Environment's physical absence from the URC for a second year was a bad sign concerning the prioritization of environmental protection.

Environmental concerns were also strongly featured at the Challenges,

Opportunities and Case Studies for Ukraine's Green Reconstruction side event, a gathering organized by and Ukrainian European associations alongside NGOs. Through concrete examples, from debris reuse and green public buildings to ecomaterial innovations, the event made a strong case for embedding circularity, climate-resilient infrastructure, into Ukraine's green innovation reconstruction. Despite those principles, the event's presenters largely framed the green transition as a business case, with much of the momentum driven by local and sectoral actors rather than a coherent national strategy.

(Green) energy

Energy, a central topic at URC2025, provided the consistent most sustainability thread. The European Bank for Reconstruction and Development (EBRD), the European Commission (EC), development and partners "Ukraine the Renewable Energy Risk Mitigation Mechanism" (URMM). Once implemented, "the mechanism is expected to support 1 GW of new renewable energy capacity, potentially mobilizing €1.5 billion in investments", according to the EBRD. The EU has already endorsed an initial €180 million for the project, with several Ukrainian agencies and associations (Ukrainian Wind Energy Agency, Green Deal Ukraïna etc.) involved in



this initiative. Mechanisms of this kind are important because they combine publicly backed financial guarantees, facilitate institutional coordination with private investment, and enable large-scale, strategic projects in the renewables sector, thus demonstrating a tangible commitment to green recovery. However, it's worth asking how genuinely "green" these mechanisms are in practice.

Recent years have seen a rapid increase of <u>unsustainable</u> wind energy projects in western regions of Ukraine, many sited in biodiversity-rich areas, including protected landscapes, bird migration corridors, and sensitive habitats. These projects have often proceeded <u>without adequate environmental safeguards</u>, frequently ignoring or circumventing environmental impact assessments and lacking robust oversight to prevent ecological harm.

Several other themes prominently featured at the URC 2025 converged on energy issues. Energy is crucial for Ukraine's short and long-term civil, military economic resilience. and energy Boosting Ukraine's export capacity was also projected to become crucial for European energy security and the EU's independence from Russian energy imports. However, some speakers did not differentiate between energy sources and took growing energy demand for granted, raising questions in environmental terms. Yet, a relatively coherent commitment to rolling out

renewable energy capacity was tangible. Besides being more environmentally sustainable, decentralized smaller-scale renewable energy generation strengthens energy resilience in wartime because they are more resistant and difficult to destroy. Given the (slow and partial) global shift toward renewable energy, bolstering its production in Ukraine is further presented as bringing the country on track for the future. During an energy side-event, Andrii Teliupa, Deputy Minister of Economy, stated "I believe green transition should not be about some ideology, it has to be about concrete feasible projects". It was, in the end, a combination of such pragmatism and commitment to bigger ideas of green transition, immediate energy need and strategic importance, and public and private investments in the energy sector that resulted in lively debates and some credible commitments.

Meanwhile, despite the growing relevance carbon markets for Ukraine's recovery, the subject was not featured in the conference's main agenda. It was instead addressed only at one side event, reflecting its preliminary status in national policy discussions. The potential interplay between voluntary and compliance carbon pricing especially relevant for sectors leading the green transition, such as those dependent on critical raw materials, since access to these resources underpins both the scaling of low-carbon technologies and



the effectiveness of emerging carbon market mechanisms.

Critical raw materials

Interestingly, URC 2025 presented Ukraine's critical materials raw strategy as inseparable from economic transformation and green transition. From the main "Investing in Ukraine's Critical Minerals: A Strategic Asset for Global Supply Chains" panel to side events, there was consistent emphasis on integrating raw material extraction with downstream processing, advanced manufacturing, and the circular economy. During several sessions, speakers highlighted new opportunities joint production, international cooperation (notably with the EU and the UK), and strategic investment in flagship projects like the Balakhovsky graphite deposit. Many also pointed to efforts already underway to harmonize Ukraine's legislative and strategic frameworks with OECD standards, backed by support from the EBRD and mechanisms like the Global Reconstruction and Renovation Fund for Ukraine. Yet this framing raises a critical question: does positioning the critical raw materials sector at the heart of Ukraine's green transition automatically make it sustainable? While the rhetoric of circularity and innovation was present, the underlying emphasis remained on growth, extraction, and geopolitical competitiveness.

Role of NGOs and civil society

Environmental **NGOs** the most vocal and coherent advocates of environmental concerns at URC 2025. More NGO representatives registered to participate compared to previous URCs. They organized side events, met with members of the Italian Parliament and the German Ministry for the Environment, and used opportunities to interact with officials. However, few NGO representatives were invited to speak on panels where preference was instead given to high-level officials, government, bank, and business representatives. They spoke up in discussions, but discussion time was limited.

The Build Ukraine Back Better coalition of civil society organizations, think tanks and academic institutions had prepared Roadmap for the Sustainable Recovery of Ukraine before this year's **URC** and successfully promoted it during the event. The roadmap outlines "priority reforms, policies, and structural changes that need to be implemented over the next few years to ensure an environmentally sustainable and resilient recovery". The roadmap is built on the primary principles of sustainable recovery and reconstruction and of climate neutrality by 2050, and it highlighted the implications of Ukraine's EU integration for the key sectors of agriculture, construction, economy, energy, environment and transport.



Several panel speakers mentioned the document and confirmed its significance as a comprehensive strategy.

Tensions and contradictions

Many speakers signaled confidence regarding the progress already made, noting the strength of the alliance gathered, projects and propositions already underway, and a bright(er) for Ukraine. Pointing future synergies and win-win solutions is part of signalling optimism and some of these suggestions seem reasonable. For example, renewable energy sources can simultaneously serve energy resilience and the environment. Increased domestic of processing agricultural produce (rather than exporting raw products) simultaneously increases domestic value capture and biomass production to fuel bioenergy generation. Technologies for climate-smart agriculture are available and can provide multiple benefits.

There are limits and risks in projecting Ukraine as a land full of opportunities and potential. During some side events, held over wine in ancient Roman palazzos, it was tempting to forget these discussions centered on a country drawn into a brutal war. As Pavlo Kukhta, Ukraine's former Minister of Economic Development, Trade and Agriculture, reminded the audience when invited to speak about untapped business opportunities, "the war is still going on, and there is nothing good about that".

Moral questions aside, attention to the limitations and potential downsides of proclaimed win-win solutions is due. As protests and court cases in Ukraine and elsewhere show, renewable energy projects require solid screening and local participation to avoid harmful effects on biodiversity or local communities. The argument that increasing food processing will help renewable energy production comes with a risk greenwashing resource-intensive, methane-emitting, and polluting kinds of animal husbandry.

Further. tensions appear when several grand promises and goals are put forward simultaneously. With the right programs, investments, and partnerships, advocates assert Ukraine can increase its contribution to global food security, European energy security through biofuels, wind, and solar energy, and export large amounts of critical raw materials, while, at the same time, contributing to international goals of land recovery and protected areas. However, there are limits to the availability of land and natural resources, and the stresses put on Ukrainian ecosystems and soils in the past and during the war, are rarely mentioned.

Business opportunities, emphasized at some panels, side events and in the exhibition hall, are important to generate investment, which Ukraine urgently needs. However, opportunity-seeking businesses are not always the most



reliable partners when it comes to issues of environmental sustainability or social justice, and their strategies and activities require close observation. Participatory and strategic planning and institutional coordination are important to direct investments in sustainable directions, governments and transnational organizations involved should be held accountable, and sustainability should be mainstreamed, particularly in business and industry.

Fast on the heels of the URC, a long-rumoured government reshuffle took place. The Cabinet of Ministers <u>abolished</u> the Ministry of Agrarian Policy and Food and the Ministry of Environmental Protection and Natural Resources, transferring their functions to a newly created Ministry of Economy, Environment Agriculture and Ukraine, headed by Oleksii Sobolev. Yulia Svyrydenko became the new Prime Minister of Ukraine, following the resignation of Denys Shmyhal. During the URC, then in her capacity as First Deputy Prime Minister and Minister of Economy, Svyrydenko participated in multiple panels and bilateral meetings, emphasizing Ukraine's determination to attract foreign investment and the role of international private capital in reconstruction. Shortly before, she announced a forthcoming moratorium on business inspections, and upon taking office, pledged to continue deregulation, protect businesses from undue pressure,

accelerate privatization, and strengthen support for Ukrainian producers.

developments These could have significant implications for environmental governance and oversight. Concentrating the economic, environmental agricultural and portfolios in a single "super-ministry", combined with a moratorium business inspections and an agenda of deregulation and privatization, could weaken regulatory safeguards environmental standards further, at a time when robust oversight is essential to ensure that reconstruction efforts are genuinely sustainable. Although the stated aim is to support Ukrainian businesses and accelerate recovery, it is unclear how these changes will the country's capacity impact enforce environmental protection and sustainability commitments in practice.

At the same time, Ukraine will expected to demonstrate it is upholding the environmental commitments it has made to both its citizens and its international partners. One key instrument in this regard is the recently approved "Strategy for ReformingtheSystemofStateSupervision in the Field of Environmental Protection through 2029", endorsed by the Cabinet of Ministers right before the URC. The reform aims to replace Ukraine's historically punitive and fragmented system of environmental oversight with a modernized, preventive, and risk-



based model. Yet with the independent Ministry of Environmental Protection now abolished, a question arises: who will attend to this ambitious agenda and ensure its effective implementation?

Learnings, outlook and strategies

There are more URCs to come, and discussions on how to rebuild Ukraine better and greener will continue. The Polish-Ukrainian URC 2026 presidency has an opportunity to enhance the debate around green reconstruction through mainstreaming sustainability across sectors and putting a muchneeded spotlight on the recovery of the environment.

In the course of EU accession and institutional support programs, the EU, multilateral development banks (MDBs) and other transnational institutions drive and shape legal and regulatory reforms in Ukraine in areas including decarbonization and nature protection. However, these institutions have never been perfect or fully coherent in terms of their environmental policies and have recently begun rolling back some progressive environmental policies in response to political backlashes (in the case of the EU) and funding cuts (in the case of transnational donors). Citizens and environmental groups everywhere contribute to upholding and strengthening green reconstruction in Ukraine by pressuring transnational organizations to prioritize environmental challenges in their programs and policies. Putting pressure on governments and companies to end Russian fossil fuel imports further helps the Ukrainian cause, while moving toward carbon neutrality more generally.

Accountability is necessary to enable the passage of legislative frameworks Ukraine's sustainable supporting recovery, such as the <u>Green Recovery</u> Law, and to ensure their subsequent implementation. This, in turn, requires the swift adoption of secondary legislation. Regulations, decrees, and technical standards issued by governmental agencies must contain detailed rules and mechanisms to translate the law's objectives into reality, including specific environmental standards for projects, procedures for impact assessments, and enforcement mechanisms. This secondary framework must establish transparent monitoring systems and penalties for non-compliance.

addition to its already low institutional the capacity, recent liquidation of Ministry of the Environment and the creation of a new ministry that will combine the economy, environment agriculture and result in environmental <u>deregulation</u>. Ukrainian authorities must translate their promises and pledges to green the economy into effective legislation, and NGOs, international partners and others must hold them accountable.



Signalling unity in the face of Russian aggression and tremendous challenges at the URC is important. It is also important to acknowledge differences in interests and priorities, and limitations imposed by an ongoing war and the limited availability of resources. Nevertheless, the prevailing political and economic pragmatism at the URC and the broader recovery debate can create opportunities.

Even decision-makers who do not ideologically prioritize environmental concerns may be engaged and even when persuaded environmental strategies are presented as addressing multiple pressing needs, especially if promoted by international businesses committed to sustainability, as well as by civil society and academic actors. Civil society organisations, in particular, have a unique and irreplaceable role; they are often the only actors able to credibly represent the voices and needs of people on the ground. Academic institutions, too, can contribute analytical rigor and long-term vision. Together, these actors must proactively communicate how environmental solutions align broader recovery priorities. Framing policies as 'win-win' strategies can be a pragmatic and effective approach, but only if grounded in credibility, inclusiveness, and strategic foresight. This is why planning and scenario development essential. The are Roadmap for the Sustainable Recovery of Ukraine is an excellent example of how coordinated civil society initiatives can generate comprehensive, forwardlooking proposals that policymakers can trust and build upon.

At this and previous URCs, there was no official participation category for academics, and the few invited speakers from educational institutions mostly represented business schools. Some scenarios and promises, for example, around green hydrogen, would certainly benefit from a science-based reality check. More generally, scientists can identify risks and propose solutions, bringing attention to systemic environmental relations or lessons to be learned from earlier reforms and transformations in Ukraine and elsewhere. This could benefit the environmental NGOs that have the most persistent voices relating to environmental concerns, though they are sometimes perceived as representing particular and narrow interests and are occasionally criticized for lacking credibility, being seen as activists rather than evidence-based organizations.

Finally, much is changing rapidly and simultaneously across Ukraine's societal, political, and economic spheres. Alongside the expected reforms, the country is being compelled, by both circumstances and the strategies chosen to address them, to serve as a testing ground for deep and swift structural transformation. However, as past experience in Ukraine and beyond shows, such sweeping changes carry significant



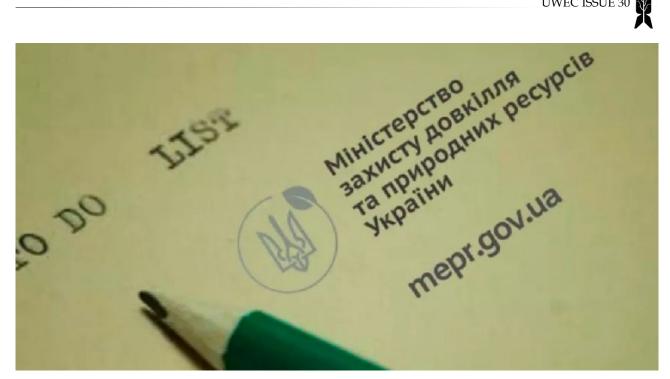
risks and can disproportionately impact certain social groups. To mitigate these risks, broad participation across different segments of society and fields of expertise is essential. Environmental issues, alongside social justice, must be treated not as standalone concerns, but as cross-cutting priorities embedded throughout Ukraine's reform processes

and the agenda of the Ukraine Recovery Conferences. •

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Merging ministries: Will changes in the structure of Ukraine's government roll back the environmental agenda?

Inha Pavly

Tkraine has reorganized its ministerial structure, merging its environmental, economic and agricultural ministries into a single body. Will the move result in more effective environmental governance or a worsening of the situation or hamstring Ukraine's green policy? And how have Ukrainian environmental organizations reacted to the reshuffle?

On July 21, 2025 the Cabinet of Ministers of Ukraine abolished the Ministry of

Environment and Natural Resources (Mindovkillya) by merging it with two others- the Ministry of Agrarian Policy and the Ministry of Economy. The property, rights and obligations of the liquidated ministries now come under the auspices of the newly formed Ministry of Economy, Environment and Agriculture of Ukraine.

In itself this move is not unusual. Ukraine has reorganized the



environmental ministry (the successor of a Soviet-era predecessor) several times since its creation in 1991, including ill-fated mergers with other ministries. And in the European Union (EU) there are also examples of environmental ministries being combined with other executive bodies. This is the situation in Croatia, France, Ireland, Latvia and Spain, among others. However, the environmental component of combined ministries like these remains a priority and is not subordinated to other concerns, as the Ukrainian environmental law organization Environment People Law noted in its public statement on the critical consequences of the closure of Mindovkillya. To put things in perspective, Hungary is the only EU country where environmental protection is linked to agriculture within a single ministry—with a clear priority in favor of the latter.

At the end of July, Ukraine's newly appointed Minister of Economy, Environment and Agriculture Oleksiy Sobolev held a briefing, in which he explained how the new ministry would work. Its priority environmental areas are defined as irrigation and melioration, increasing agricultural production and attracting investments in green industrialization. In terms of implementation, the focus will be on waste recycling, forest restoration and projects for the development of timber markets, developing the critical minerals and raw materials sector (particularly rare earth metals), conducting environmental impact assessments (EIA) while maintaining a corresponding unified register, and data digitalization.

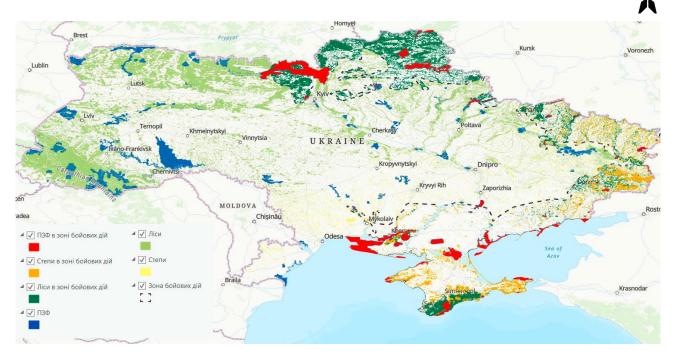
Sobolev's deputy Yegor Perelygin will be in charge of policy on subsoil use, natural resources, the collection and digitalization of geological data, and the extraction of critical minerals.

'Environmental protection functions should be carried out by a separate institution'

In the new ministry, these environment-related areas are now clearly inseparably linked with the economy, says Greenpeace Ukraine's director Natalia Gozak, who fears this may create problems.

"State environmental protection functions should be performed by a separate institution in the country," she explains. "The processes involved with studying the impact on the environment, assessing this impact are more complex. Environmental protection is not so much a question of economics as of certain restrictions in the use of natural resources, which should be defended by a separate ministry, which has its own perspective."

As Gozak points out, the aim of the Ministry of Economy and Agriculture is to support development and maximize the use of natural resources, while the Ministry of Environmental Protection



Natural areas damaged by Russia's military invasion: orange – steppe areas in the combat zone; dark green – forest areas in the combat zone; blue – nature reserve fund areas; light green – forest areas; yellow – steppe areas; dotted lines – frontlines. Source: Ukrainian Nature Conservation Group

focuses on setting boundaries for this. "And when these two contradictory processes are combined in one, then the priorities change. It is clear that now the ministry's priority will be the economy," she warns.

A well-functioning, independent environmental protection authority is of crucial importance for Ukraine in the context of the full-scale war unleashed by Russia. Military action has inflicted catastrophic damage to atmospheric air, land and water resources. The cost of clearing minefields and restoring Ukraine's destroyed forests, fields and polluted water bodies is currently estimated at more than \$120 billion—a price Ukrainians will have to face once hostilities are over. The shuttering

of Mindovkillya, which would have coordinated such restoration, can only slow down these processes.

Natalia Gozak thinks that work on calculating losses and recording war crimes against the environment will continue unaffected. "But post-war restoration will definitely receive a lower priority after the liquidation of the ministry," she says. "If we talk about green restoration in the context of energy, the transport system or construction, then this will continue in one way or another. Again, however, there is a threat of a reduced focus on this important process for Ukraine. Especially in the context of European integration."

Despite widespread discontent among representatives of environmental organizations, scientists and human



rights activists over the dissolution of Mindovkillya, the authorities have yet to provide a public justification of the reasons for this reshuffle and the significant reduction in the attention paid to environmental protection issues by the state.

How will the move affect the implementation of EU environmental reforms?

While Mindovkillya had received a certain amount of criticism, this doesn't necessarily mean it was doing a bad job, says lawyer Sofia Shutyak, deputy chairperson of the agrarian, land and environmental law committee of the National Association of Ukrainian Agrarians. In her opinion, this merely proves that the Ministry deals with a wide range of issues, and therefore conflicts of interest naturally arise. These are often not public, and while they may be presented as part of the fight for a cleaner environment, in reality they are all about preserving businesses and their income, without due attention to environmental issues.

In February, the Cabinet of Ministers approved the government's Priority Action Plan for 2025, However, in spite of everything, the plan largely left Mindovkillya on the sidelines.

"The Plan does not contain key tasks for environmental monitoring, which is the key to generating environmental information

that should form the basis for decision-Sofia making," explains Shutyak. However, the plan does not raise the issue of environmental fees paid by companies to offset environmental damage (except for waste disposal fees), which will have an effect in the case of industry being made more accountable, nor does it contain an acknowledgement of the value of natural ecosystems and the damage caused to water, land resources and biodiversity by military action. Other issues were absent, too: Shutyak highlighted the practice of damage to monetizing ecosystems through retrospective fines, as well as the importance of broadening criminal and administrative liability in the environmental sphere.

"The Plan also did not provide for a role for Mindovkillya in the negotiation process to prepare Ukraine for joining the European Union, namely, the harmonization of all regulatory acts with European standards. EU regulations are directly applicable and therefore their introduction through certain changes in regulatory acts is wrong," she continued.

<u>EU legislation and standards</u> are divided into 35 chapters covering different spheres. These form the basis of the legislative model to be followed for each candidate country and must be considered during accession negotiations. Chapter 27, "Environment and Climate Change," is one of the most complex in the EU accession process



in terms of the funding, institutional capacity and profound habitual changes it requires from individuals and industry alike. This chapter contains more than 200 EU legislative acts.

The criteria for joining the EU can be defined as political (stable institutions that can guarantee democracy, the rule of law, human rights and the protection of minorities), economic (a functioning market economy and the ability to withstand competition in the EU market) and the acquis communautaire, a set of common rights and legal obligations that are binding on all EU member states).

Ukraine has made significant progress in implementing European reforms, as Sofia Shutyak notes. In addition, Ukrainian business, which is EU-oriented, has shown that it is capable of operating according to the rules of the European Union, as the European Commission's 2024 report makes clear.

Admission to the European Union is contingent on the adoption of a number of directives concerning environmental protection: the Air Quality Directive, Emission the **National** Reduction Commitments Directive, the Convention Long-Range Transboundary Air on Pollution, the Water Framework Directive, the Birds Directive and the Habitats Directive. It is also important to regulate industrial emissions, waste management and the protection of the civilian population.

Shutyak explains, preparing As Ukraine for joining the EU not only requires the adoption of new legislation. "Most of the directives have been integrated into current Ukrainian law, since we have always had high-quality legislation. But regulations and other mandatory EU directives don't need to be created. They need to be translated [into Ukrainian] and executed. After all, one of the criteria for a country's readiness is a change in the behavior of all its [administrative, corporate and individual] subjects. The role of Mindovkillya in this process is indispensable, since the economy is just one of the tools for environmental protection, but the environment is a much narrower issue," she says.

She cautions that the formation of a larger, multi-track ministry will complicate bureaucratic processes and the ministry's central task as defined in Article 20 of Ukrainian law "On Environmental Protection," which outlines the competence of the central executive body to implement state policy in the field of environmental protection.

"It wasn't just that the Ministry was abolished – Ukraine lost an important policy track. The only way forward is to restore Mindovkillya before it's too late," says Shutyak. The dissolution of the Ministry of Environmental Protection and Natural Resources of Ukraine amounts to no less than the sidelining of the environmental agenda. For a country that has been trapped in a full-scale



war for three and a half years, causing billions in damage to the environment, this is a step back and threatens to hobble environmental reforms on the path to European integration. The environmental community is therefore calling on Ukraine's leadership to abolish the decision to merge Mindovkillya

with other ministries and to strengthen work on environmental protection instead. UWEC Work Group supports this call and will continue to monitor the development of environmental policy in Ukraine. •

Translated by Alastair Gill

