

## Ukrainian Nature Conservation Group Annual report for 2022

Ukrainian Nature Conservation Group (UNCG) was registered in 2018. The constituent assembly was held on March 2. The main goal of UNCG is to unite the efforts of scientists, experts and public activists for the protection of biodiversity, the preservation and development of protected areas, as well as for the implementation of international environmental legislation in Ukraine.

The year 2022 was not the same for us as all the previous ones had been: for the first time we were forced not to act according to plans, but to react to circumstances. The full-scale invasion of Russian troops endangered the preservation of many protected areas, stopped the national parks and reserves that were under the occupation or in the war zone functioning. Their workers were often left without livelihood, housing, some were captured or even executed by the invaders. Many of our colleagues expressed a wish to make a stand for Ukraine in the ranks of the Armed Forces of Ukraine. Therefore, our first priority was [to help our colleagues who were in trouble](#), as well as our colleagues at frontline. Thanks to the active support of [foreign partners](#) and donors, providing assistance in a varying degree to 15 national parks, 4 natural and 2 biosphere reserves became possible. In some cases, when timely fuel purchasing was possible, this assistance had a decisive effect on the people early evacuation from the occupied territories or the combat zone. The only protected area, which is still functioning as a real island of unconquered Ukraine in the occupied territory, is the Askania-Nova biosphere reserve, whose workers, thanks to that support, managed to hold on for a whole year since the beginning of the invasion. More information about it is also available on the [reserve's website](#).

During the first days of the war, most of us also had to leave our homes, while some stuck in the most difficult conditions in the cities of Mariupol, Sumy, Kharkiv, and Chuguyev. Part of our team had to live for a while under occupation in the Kherson and Sumy oblasts.

It is interesting that at the height of the invasion, our site experienced several cyberattacks, as most of the central mass media and state websites of Ukraine did.

However, we did not stop working on environmental protection in these new conditions. We continued our activities in strategic directions.

### Establishment of new protected areas

In 2022, at our request, protected areas in Cherkasy oblast («[Dzendsiry](#)» reserve), in Zakarpattia oblast («[The Transcarpathian Sea Shore](#)» reserve), in Ternopil oblast («[Loshnivska stina](#)» reserve), in Kyiv oblast (natural monument «Age-Old Pine» and reserve «[Oak Hollow](#)») were created. It is especially worth mentioning that the [National Nature Park «Kholodnyi Yar»](#) was established due to the long-term efforts of our colleagues from Cherkasy oblast.

During the year, we prepared justifications for the establishment of 2 more national parks and 27 new nature reserves ([map](#)): Khilchynskyi, Brovarskyi lis (Brovary forest), Balka Shysheva, Ushnyanskyi, Desnyanska Zaplava (the Desna Floodplain), [Berezivka, Berezivka 2, the Krasna River, the Demine River Slopes, Tanyushevskyi, Preobrazhenskyi, Verkhnyodunavskyi, Bohoroditsky](#), Zapsillya, Steppe Zapsillya, Eastern Svidovets, Bratkivskyi, Hora Durnya, Denysenkiv Yar, Borzhava Slopes, Beskydy, Lovinski luky (Lovyn meadows), Chortalski horizons, Halytsynivski sands, Hruzko-Lomivskyi, Chyhrynsko-Kohokliyskyi steppe. Requests for all those territories creation have been approved by the Ministry of Environmental Protection and Natural Resources of Ukraine and are currently in the process of establishment.

During 2022, we and the land users agreed on the establishment of the reserves «Matviivski kuchuhury», «Balka Zarubina» and «Oleksandrivska balka» in the Mykolayiv oblast and the «Chyhrynsko-Kohokliyskyi step» reserve in Odesa oblast.

The establishment of the "Beskydy" landscape reserve, which we requested in 2022, is to be announced during the first quarter of 2023 in Lviv oblast. So far, its establishment has been supported by the specialized commissions of the regional council, and a draft decision has been published.

### Protected areas monitoring

In 2022, we continued to detect nature protection and land legislation violations within the protected areas. Unfortunately, the war did not stop the violators and steppes plowing, deforestation and other illegal actions continued in the territories under control of Ukraine. Such violations were found on the territory of Dihtyariivskiy, Vodospad (prosecutor's office is taking measures to define its boundaries), [Raidolynskiy step](#), [Astrahal](#), Prolisok, [Inhulski krutoskhyly](#), [Hruzka balka](#), Arkadiievskiy, [Kashyro-Oleksandirskiy](#), Hrenivskiy, Kamianohirskiy, Skalky, Serhiivskiy, Balka Hlyboka, Balka Zmiina, [Chaplyno-Vasylkivskiy](#), Verkhnokilchenskiy, Serednochalynskyy, Zaplavka, [Urochyshe Pryorilsk](#), Ternivskiy, Novohryhorivskiy, Urochyshe Mohyla Baba, Nadvovchanskyy, Likarivskiy, Lozuvatskiy, Buzove, Hariachkivskiy lis, natural memorial Hora Revyna (the prosecutor's office filed a lawsuit demanding that the land user define the boundaries of the nature monument in nature), Pryshyb, protected tracts Salkivske, [Hruzke](#). Criminal proceedings have been opened and pre-trial investigations are being conducted for all violations.

Investigations of violations in Vinnytsia oblast reserves are most active: [«Zelena»](#), [«Hopchytisia»](#), [«Kurochka»](#), [«Nadrossia»](#). In Kharkiv oblast, following our appeal, the prosecutor's office filed a lawsuit to the court with the aim to return 5 land plots within the botanical reserve of local importance «Aloshkina Balka», which were illegally transferred into private ownership

Unfortunately, the struggle against such violations in the legal field continues over a long period of time, but some final victories took place in 2022 as well. 6 plots of land within the boundaries of the [Khomorski Zaplavy](#) reserve were returned to state ownership by the court decision in Khmelnytskyi oblast. Also, as a result of past efforts, the prosecutor's office returned the lands to the nature reserve in the [Boryspilski Ostrov](#) nature reserve that had been illegally transferred to private ownership. Due to our efforts and appeals, the Commercial Court of Sicheslavskaya oblast recognized the transfer of a 13-hectare plot of land within the boundaries of the [«Kamianskiy Riparian Complex»](#) nature reserve as illegal and returned the plot to the state ownership.

### Steppes and meadows

This year, we continued identifying natural areas ([shore protective strips and river floodplains, hollows, steppes and meadows](#)) put up for sale at land auctions. In total, 535 such sites with the total area of 5620 ha were discovered. Accordingly, we started correspondence with 57 communities, which put up natural territories for sale for agricultural needs in 2022. United territorial communities' officials were informed about discovered violations in the plots selection for auctions. We also offered communities alternative to plowing ways of land use, such as public pastures or establishment of protected areas. At the moment, only 2 communities started a dialogue.

After our proposals to remove steppe plots from land auctions consideration, the Komar community of Donetsk oblast excluded all steppes from sale and decided to create a nature reserve on those lands. In addition, the community adopted a program of nature protection and preservation of steppe territories.

Meanwhile, much more successful work was conducted at the central level. The Government made changes to «The Rules of the Forests Reproduction» according to [our proposals](#) and banned afforestation on steppe, meadow areas, swamps.

### Forests

Since February 24, together with Ukrainian and European activists and organizations, we had promoted the necessity of introducing sanctions against Russian wood and its products. As a result, the EU

imposed appropriate sanctions led to significant problems in more than 14 billion forest and woodworking sector of the Russian Federation.

In order to strengthen further sanctions, together with the Parliament of Ukraine we developed a Draft Resolution on the Appeal of Verkhovna Rada of Ukraine to the European Commission, the European Parliament, the Council of the European Union, the World Trade Organization, governments and parliaments of foreign countries regarding the imposition of sanctions on the import of Russian and Belarusian wood and wood products, Russian fish and seafood, the ban on the export of equipment and its components, as well as the inadmissibility of international environmental certification systems operating on the territory of the Russian Federation, registered on January 6, 2023.

We also joined the campaign for confiscation of the assets of Russian forest oligarchs in Ukraine, in particular, sanctions based on our appeals were imposed on the oligarch Krupchak.

Throughout the year, we systematically worked on monitoring new legislative initiatives in the forestry sector. In particular, [the initiative to remove most environmental requirements for sanitary logging was discovered and successfully countered](#). Those changes were never approved by the Cabinet of Ministers. Together with other public organizations, we launched a [campaign against the draft law №8058](#), which threatened nature under the guise of business deregulation. As of 2023, the bill has been put on hold.

[Law №5650](#), the development of which involved experts of the Organization during previous years, was adopted by the Verkhovna Rada in 2022. **The law introduces the concepts of «naturally-afforested lands» and «invasive species» into the legal field, creates prerequisites for the unregistered forests protection and directly prohibits trees planting in steppes.**

Later, this success was consolidated by [changes to the Rules of the forests reproduction](#) in Ukraine. We and our colleagues from other organizations **achieved a direct ban on the afforestation of steppes, meadows and swamps, as well as a ban on the use of invasive tree species in the forestry.** In 2023, the invasive trees list must be approved by the Ministry of Environment.

Despite the closure of access to most public data and the ban on forests visiting, the Organization experts worked hard to identify illegal logging. In 2022, **more than 20 cases of the carried out or planned illegal logging were discovered** in Zakarpattia and Chernivtsi Oblasts, as well as in Kyiv. All information has been transferred to law enforcement agencies. In particular, we managed to stop illegal sanitary logging on 11 sites in the Carpathian Biosphere Reserve.

More than **195 forest plots which were illegally privatized for the purpose of housing** (in Vinnytsia, Khmelnytskyi, Volyn, Zhytomyr, and Cherkasy Oblasts) were also discovered in 2022. Materials were transferred to the prosecutor's office, and law enforcement agencies [are already working](#) on returning some of the plots to state ownership.

Land auctions were also analyzed to identify self-seeded forests put up for auction. As a result, **almost 2000 hectares of self-seeded forests were discovered for sale**, the Ministry of Environment and other authorities reported. On 208 hectares in the Chernihiv Oblast, local forestry farms are working to preserve these forests.

Much of the forest work has not yet yielded an obvious result at the central level in 2022 and remains outside the scope of this report (for example, work on the [new Rules of felling in the forests of Ukraine](#) and a lot of other things). But we do not give up and expect that our work in 2022 will be converted into a good result in 2023 and will be included into the next report.

### Environmental Impact Assessment (EIA)

**Analysis of the Environmental Impact Assessment register.** Unfortunately, after the full-scale invasion, the EIA registry was completely closed, reopening partially only in mid-June. Currently, it is available for manual access through requests. No one can see notifications of planned activities (there is no sense in requesting them due to delayed responses and constant massive violations of the content of the

notifications). This is how the little information that was available was lost. Additional information on the "location" of activities, almost all open registers and sources of analytical data, including even the cadaster, data on mineral deposits, and data from forest maps, were also lost.

By the time the EIA register was closed, we had [processed](#) 389 EIA reports and notifications. We sent 42 letters with proposals for the future reports, as well as 48 letters with objections to the already issued EIA reports (objections are a large-scale response to a several hundred-page report, which requires many hours of analysts' work each time). We had 16 winning cases and another 7 limited to suggestions, which was enough. We calculated that we had 33.3% of winning cases based on reports alone. Our efficiency grew steadily, exceeding last year's successes by 10%. After the registry was closed, our work was temporarily paused.

Subsequently, after the registry was reopened, we prepared objections to 28 reports and suggestions to 40 future reports. The percentage of pure victories during this time is 32.1%.

In general, we have at least 25 victories in a year based on objections to reports. Today, we manage to win almost every third case we are involved in.

Almost all cases in which we managed to prevent the positive EIA conclusion from being granted were based on the fact that we were able to demonstrate significant contradictions and/or false information in the report, hiding essential characteristics of the activity or ignoring its significant environmental impacts, or proving that the planned activity is located within or near the borders of a nature reserve fund or in areas of known populations of rare species and will cause significant impacts on it. In all cases, the authors of the reports insisted on the opposite, and the responsible state authorities (including the Ministry of Environment) did not have their own knowledge of the value of the areas to be destroyed. We would like to emphasize the following cases in which projects harmful to nature did not receive a positive EIA conclusion after our objections:

The development of a sand deposit in the Zacharova Desna nature reserve in Kyiv Oblast (the second attempt to get a conclusion), as also in a nature reserve in Rivne Oblast. Extraction of marls at Mezhyhiria and Marynopil sites in Ivano-Frankivsk region on the lands of the protected zone of the Halytskyi National Park (!!!), extraction of granites in the floodplain of the Fosa River in Vinnytsia region, which would destroy the floodplain and nature reserves. Peat extraction with the destruction of 700 hectares of forests in Volyn, which would lead to the destruction of the hydrological regime of three nature reserves and similar in Chernihiv region. Extraction of sands at the expense of 93 and 44 hectares of forest in Kyiv region, and more than 20 hectares of forest in Kharkiv region, extraction of basalt in Volyn at the expense of 78 hectares of forest. Gravel extraction in the Lviv region near the village of Strashchivychi, in a place of concentration of species important for the Emerald Network development. Interestingly, during the year, we managed to prevent 2 attempts to approve the construction of small hydropower plants in the Carpathians: No. 1 (attempt 2) and No. 2 (attempt 2) on the Teresva River. Construction of the water intake of Dolynanaftogaz of PJSC Ukrnafta on the Svicha River in the village of Tyapche, Ivano-Frankivsk region, through 600 meters of the nature reserve. Construction of a new dam on the upper Dniester, which would lead to the flooding and transformation of large areas of the Emerald Network in Lviv region into a technical reservoir and the destruction of the projected national park.

### **Open data on biodiversity**

The basis of our work on the biodiversity data collection and publication is publication of information on findings of rare species and biodiversity inventories on the GBIF (Global Biodiversity Information Facility) resource. In 2022, the Ukrainian Nature Conservation Group published in [its profile](#) 182156 locations of findings (records) of flora and fauna of Ukraine and other world countries. That number of records is represented in 75 data sets (datasets).

Work of rescuing, preservation and publishing data of affected by the war scientists was actively carried out. Thousands of records, previously stored only in paper format, were digitized and published in the

Organization's profile and are now available to the wide scientific community. Currently, work in this direction is ongoing. In particular, it became possible due to the support of small group and personal grants, one of the main tasks of which was the collection and preservation of such information, which may be irretrievably lost due to the war.

Among such grants, it is worth noting 2 EDGG Small Grants, directed to the collection and preservation of data on the flora of the south and east of Ukraine; personal grant project «Preservation of data on biodiversity of Ukraine during the Russian occupation» from the initiative of IWM Documenting Ukraine; one-time grant support from OLIN GmbH and others. It is also important to note carrying out a number of expeditionary trips within the framework of the Rufford project «Open biodiversity data: serving nature conservation in Ukraine», which resulted in the publication of a number of datasets as part of comprehensive expeditions and data collection on various groups of living organisms.

Scientific activity is an important component of our work. On the base of the published data, a number of scientific articles were published by scientists and members of the Ukrainian Nature Conservation Group in the Biodiversity Data Journal indexed in the Scopus database (Q2):

1. Polchaninova N., Marushchak O. Spiders (Araneae) of the northeast of the Luhansk Oblast (Ukraine). Biodiversity Data Journal. – 2023. - 11: e99304. <https://doi.org/10.3897/BDJ.11.e99304>
2. Skobel N., Moysiienko I., Sudnik-Wójcikowska B., Dembicz I., Zachwatowicz M., Zakharova M., Marushchak O., Dzerkal V. Vascular plants of old cemeteries in the Lower Dnipro region (Southern Ukraine) // Biodiversity Data Journal. – 2023. - 11: e99004. <https://doi.org/10.3897/BDJ.11.e99004>
3. Nekrasova O. D., Marushchak O. Yu. Records of common species of amphibians and reptiles widespread in northern, central, western and southern Ukraine // Biodiversity Data Journal. – 2023. - 11: e99036. <https://doi.org/10.3897/BDJ.11.e99036>
4. Vasyliuk O., Prylutskyi O., Marushchak O., Kuzemko A., Kutsokon I., Nekrasova O., Raes N., Rusin M. (2022) An Extended dataset of occurrences of species listed in Resolution 6 of the Bern Convention from Ukraine. Biodiversity Data Journal 10: e84002. <https://doi.org/10.3897/BDJ.10.e84002>

All data was transferred at the beginning of the Russian invasion from the Kharkiv server to the GBIF cloud server in Norway, which was kindly provided for saving data sets from Ukraine, which were under the high risk of physical destruction by another shelling by Russian troops. Currently, all data and their copies (backups) are stored both on the cloud server mentioned above and on the physical media of group members.

In order to collect data, it is necessary to carry out research in nature. Last year, most of our plans for research were destroyed, because all we were mainly aimed to those territories where the war is now raging. However, we still managed to implement some of our intentions and the results can be seen in a separate [dataset](#). This year, we also conducted a series of expeditions to study the biodiversity of the Rzhyschiv community, which involved 35 scientists. More than 10 expeditions for the biodiversity studies of different areas in 5 oblasts were also held.

## Media

During 2022, we also had to start tracking the effects of military operations on the wildlife of Ukraine. However, unlike many other organizations, we do not see any prospects in trying to calculate the monetary amount of damage caused to the environment of Ukraine. Instead, we seek to understand what changes have occurred and how these changes should be countered in the future. This tracking of environmental changes allowed us to actively comment on them in the mass media and made our team the most quoted commentator on the environmental consequences of the war in Ukraine (360 publications in the Ukrainian mass media and 84 in foreign media per year). In addition, we actively spreaded information through our own website (201 publications per year). We developed our own social networks:

<https://twitter.com/UNCG>

<https://www.facebook.com/UkrainianNatureConservationGroup>

<https://www.instagram.com/uncg/>

[https://t.me/ngo\\_uncg](https://t.me/ngo_uncg)

[https://www.youtube.com/@\\_uncg](https://www.youtube.com/@_uncg)

The war forced us to develop faster, and in order to spread information more effectively, we launched the [English-language page](#) of our website. It should be said separately, that we also spread information about the war consequences for the environment through the thematic portal of the international expert group [Ukraine War Environmental Consequences Work Group](#).

We also voiced our vision of the war consequences for wildlife at the committee hearings in the Verkhovna Rada of Ukraine (November 10), where more than 100 participants were present, during the Giving Tuesday educational event for 298 teachers, as well as at the Marshall Award lecture for teams of 15 universities in Europe and USA.

### Publications

Collection «Distribution of rare species of biota in Ukraine»:

[Volume 1. Plant world](#)

[Volume 2. Animal world](#)

Another 12 publications are still delayed, because the funds of charitable contributions are still more needed to help Nature Reserve Fund institutions.

Friends, we understood long, long ago that your help is an active environmental protection activity. Due to you, we can do extremely important things which are not popular among donors.

Even a small preserved patch of valuable natural territory is already a victory. By supporting our work, you **become part of our team, and make an important contribution to a great cause!**

We thank everyone who realizes the responsibility for the native land nature preservation and accompanies us on this path. Every little help is important and brings us closer to significant results.