

**U W**

**E C**

**Ukraine War  
Environmental  
Consequences  
Work Group**

**Issue #2**  
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*Dear Friends!*

I am pleased to share the second issue of the UWEC Work Group Journal, where we collect information about the impact of the war on the environment. In this issue we discuss not only the war's negative consequences, but also the possibilities for constructive solutions: prospects for Ukraine's «green recovery.»

We will nevertheless begin with negative impacts, a topic that is especially important today. Russia's invasion of

Ukraine has been ongoing for four months now. Every day, frequent shelling leads to soil pollution, causes fires, and has a devastating effect on ecosystems.

While it is impossible to analyze impacts in places where there are ongoing hostilities, scientists can still identify some consequences of the war's negative impact on soils in Ukraine. Our colleagues from the Ukrainian Nature Conservation Group have prepared an article dedicated to this topic:



- **Future of munitions-damaged Ukrainian lands**

*In addition to the soils article, UNCG's Oleksii Vasyliuk wrote specifically about the war's impacts on Ukraine's biodiversity. More than 200 Ukrainian Emerald Network sites are located in the immediate war zone, representing a threat to all of European biodiversity. The potential loss of many species in Ukraine will have global ecosystem consequences.*

- **20 plants that could disappear because of Russia's invasion of Ukraine**

*As we described in Issue 1 (<https://uwecworkgroup.info/issue-1/>), we can already discuss the war's direct and indirect consequences. Indirect impacts include the weakening of environmental laws in Russia. Eugene Simonov takes a closer look at this question.*

- **Environmental lawlessness during wartime**

*Simonov also analyzed the influence of Europe's REPowerEU plan on European conservation policy.*

- **Does REPowerEU Reinforce or Contradict the Green Deal?**

*And lastly, some hope for rays of «green» light after the current storm of war.*

*Ukraine and its partners are talking more and more about plans for the country's recovery. On 4-5 July, an entire conference will be dedicated to Ukraine's recovery in Lugano, Switzerland. Recovery plans must align with principles of sustainable*



development and a green economy. We share a brief overview of recent progress in this regard.

- [Green Reconstruction of Ukraine](#)

- [Civil society on the path to Ukraine's green recovery](#)

We also interviewed Maria Dyachuk a specialist in the Greening Industry program at Ecoaction Center for Environmental Initiatives. We talked about plans for Ukraine's green recovery as well as about the role civil society can play in that recovery.



Learn more about the environmental consequences of Russia's attack on Ukraine via UWEC's [Twitter account](#).

Sign up for our mailing list on our website: [UWEC Work Group](#).

By disseminating verifiable information about the war and its consequences, we help find solutions, mitigate negative impacts, and, I would like to believe, bring about the war's end more quickly.

Write to us with suggestions or collaboration ideas at [editor@uwecworkgroup.info](mailto:editor@uwecworkgroup.info).

Together, we can ensure that Ukraine's green recovery starts as soon as possible!

*Respectfully,*

*Alexei Ovchinnikov*

*Editor, UWEC Work Group Journal*



# Future of munitions-damaged Ukrainian lands

By [Oleksii Vasyluk](#) and [Valeriia Kolodezhna](#)

After World War I fighting ended a century ago, the government of France set aside 1,200 sq km of devastated but fertile land for wildlife restoration. The government of Ukraine should adopt this practice when it becomes possible after the war as well. Environmental conservation and safety principles in Ukraine should meet the same high standards used in developed Western European and other nations. This article will describe the localized consequences of munitions craters on soil ecosystems and subsequent impacts on ecosystems and humans and review global approaches to post-war approaches to managing these landscapes.

Looking at Figure 1 satellite imagery in Izyum District in Kharkiv Oblast before and after hostilities, it does not take an expert to conclude that using these and similarly damaged lands after the war will be difficult and dangerous.

We can make troubling conclusions using a methodology devised by the NGO Environment-People-Law (EPL) to estimate the consequences of munitions bombardment in eastern Ukraine. The image above shows roughly one sq km of fields containing winter crops. We counted 480 craters made by 82 mm shells, 547 craters made by 120 mm shells, and 1,025 craters made by 152 mm shells. This single square km of land is now



contaminated with roughly 500 metric tons of iron, 1 ton of sulfur compounds, and 2.35 tons of copper. It is difficult to calculate the volume of heavy metals and other compounds; that number is smaller in volume. Additionally, the explosions displaced at least 90,000 tons of soil.

It is too soon to estimate the number of craters across the entire combat zone

in Ukraine. After the Vietnam war it was estimated that there were 2.5 million craters. Today's war is ongoing, and hundreds of new such wounds appear on Ukraine's landscape every day. Thus, the task facing us now is not so much a calculation as it is an attempt to answer this question: What is our vision for damaged landscapes?



Figure 1. Satellite imagery of croplands prior to and during active hostilities [southeast of Izyum, Kharkiv oblast](#). Credit: MAXar, May 2022



## **Harm to fields, harm to nature**

Among the types of ecosystems subject to the negative impact of today's military operations, soil ecosystems arguably suffer the most. Recognition of soil as a natural ecosystem facilitates the understanding of damage to arable land as a conservation issue.

The large numbers of small organisms that create and sustain soil and its biological cover – vegetation, mosses, lichens, and fungi – are the most vulnerable due to their lack of mobility. In other words, all living organisms in the soil layer or those that protect the surface from erosion are incapable of leaving the area where munitions explode, nor can they protect themselves from their negative impacts. Study of this issue must combine the initial short-term destructive action of the blast wave followed by the long-term effects of chemical pollution.

## **Exploded munitions as chemical pollution**

A partial chemical reaction occurs as the result of a munitions explosion of any caliber and results in pollution of soil and atmosphere. In addition to relatively harmless CO<sub>2</sub> and water vapor, the oxidation of every kilogram of explosives produces several tens of cubic meters of toxic gases that enter the air column: SO<sub>2</sub>, NO<sub>x</sub>, CO (including aromatic hydrocarbons that

are significantly more toxic). Ultimately, sulfur and nitrogen oxides return to the soil through acid rain, precipitation which changes soil pH and damages plants<sup>1</sup>. In the end, soil becomes the final link in the chemical damage caused by exploded munitions.

Some metal fragments and foreign substances remain in the soil, while others disperse in the air and then precipitate back onto the land (fragments can travel up to 300 m, unused reagents up to 35 m). Unfortunately, these fragments also carry a considerable threat. Munitions are generally manufactured using iron alloys that, in addition to iron and carbon, also include sulfur and copper. 120 mm and 152 mm munitions produce, respectively, 1,600-2,350 and 2,700-3,000 individual fragments, each with a mass of 1g or larger.<sup>2</sup>

We can use satellite imagery to calculate emissions volumes from high-explosive munitions that detonate on the ground or slightly below ground. It is much more challenging to calculate the number and scale of unexploded munitions which occur in 3-30% of deployments and depend on a number of conditions. The impacts of unexploded ordnance requires further study as it relates to Ukraine today. These calculations can only highlight the scale of the problem.

## **Soil erosion**

The blast wave itself can inflict significant destruction. For example,

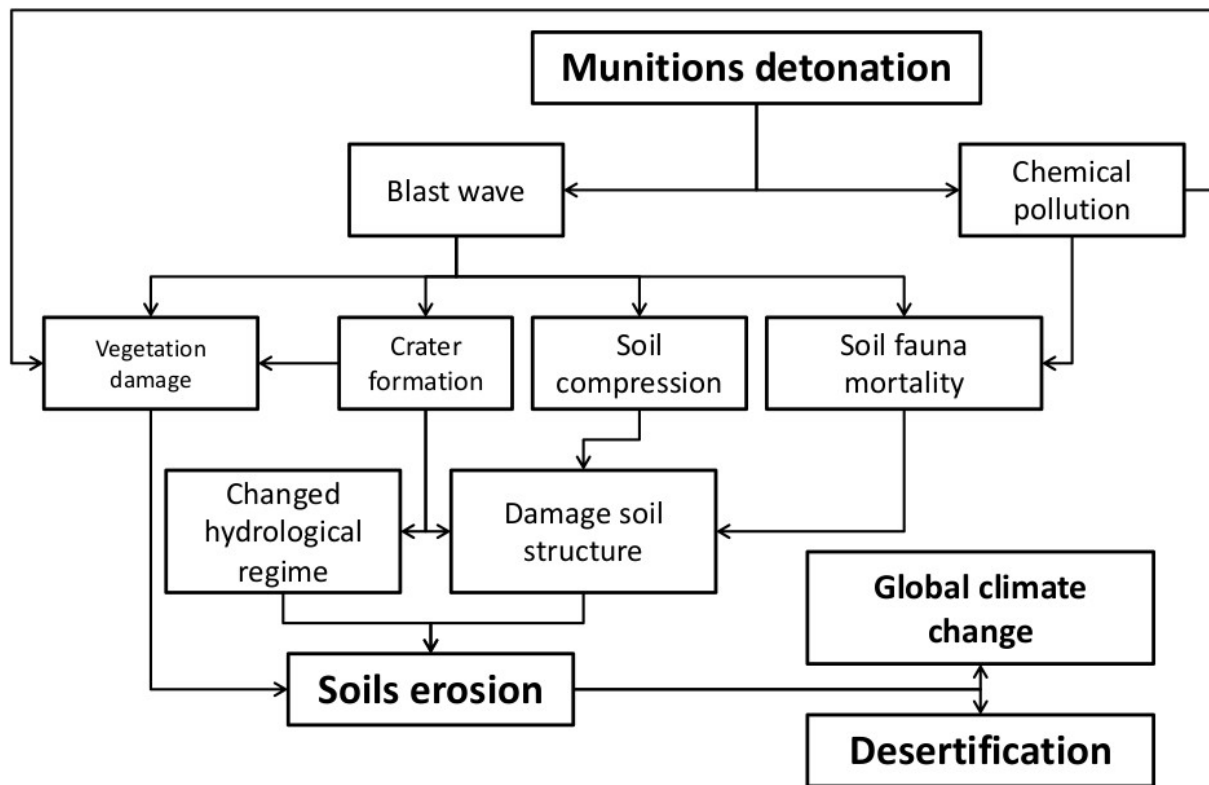


Figure 2. Consequences of soil pollution due to munitions detonation. Credit: Oleksii Vasyliuk

a 250 kg bomb can create a crater up to 8 m in diameter and 4 m deep upon detonation. Some portion of the soil is always removed due to explosion. Given that, on average, one kilogram of explosives produces 1.5 cubic meters of displaced soil, a 250 kg bomb displaces 375 cubic meters of soil. The remaining soil in the crater will be compressed given that the main action of the blast wave occurs there.

Compacted soil is structurally degraded and changed, on top of changes stemming from agricultural processes that dominated the pre-war soil landscape (humification, leaching, weather, and, of course, the moisture cycle). These war-related soil change processes necessarily result in changes

to soil composition, an issue still being encountered today in Central Europe (including Ukraine) after the first World War. [Natural soil restoration](#) is a remarkably time-consuming process with a global average rate of 0.06 mm of soil per year.

As for natural vegetation, virtually nothing will remain at the explosion site. Sometimes, the blast can also destroy the waterproof layer of bedrock beneath. In those cases, water infiltration accelerates into subsurface layers without lingering, actively eroding the walls of the crater in its path. This in turn hastens deposition of organic material in the soil profile by increasing the number of micro- and macrofauna, [but also results in acidification](#) rather than enrichment

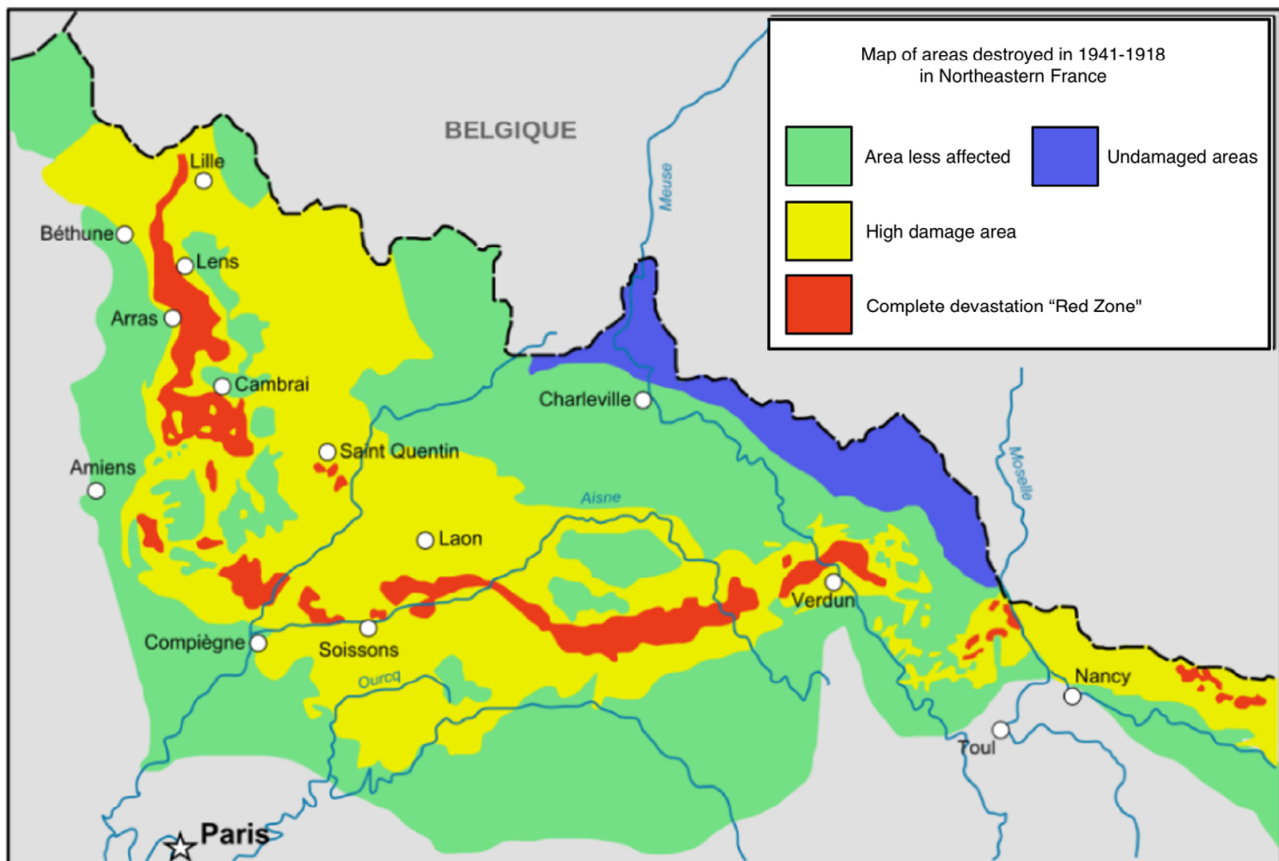


Figure 3. French Red Zone map, showing zones completely destroyed during World War I. Credit: Wikimedia Commons

of the soil. Rapidly dispersing pollutants enter water-bearing layers and waterways in the same fashion, sometimes traveling far beyond the battlefield and influencing the biota and ecosystem services that depend on water and from which humans benefit. For example, drinking water use was banned in 2012 in 544 municipalities near France's "Red Zone" (see below) [due to excessive concentrations of the percolate](#) used in rocket and munitions production.

The schematic in Figure 2 maps the impacts of munitions explosions on the environment. Looking at the progression, it is clear that soil erosion results in the

loss of fertile topsoil and the release of its accumulated organic matter into the atmosphere – also a primary factor in global climate change and desertification.

Stewardship of Ukraine's rich soils was problematic prior to the war, with almost 26% (16 million hectares) of soil cover considered "eroded," with another 15% in need of removal from cultivation for restoration. Damage on this scale is the result of unsustainable agricultural practices, including the siting of many plowed areas on slopes. In wartime, erosive processes have an even greater cumulative impact.

It is also noteworthy that soil erosion in wartime takes place not only during





munitions explosions, but also in the form of direct damage to the soil layer caused by heavy equipment, dug fortifications, and trenches of various types. Considering that the majority of military actions in 2022 are taking place in Ukraine's fertile soil zone, the impacts of pollution and erosion on agriculture will be significant, likely even more significant than wildlife impacts.

## Managing war-damaged lands

The simplest approach that is safe for humans and ecosystems is to

simply abandon munitions-polluted lands. That was the course taken in northeastern France's Red Zone. The French government declared over 1,200 sq km of arable land in the area where the Battle of Verdun took place "completely devastated" and enacted a strict entry ban and included additional zoning (Figure 3) to reflect other degrees of impact.

Subsequent cleanup work in the most impacted areas reduced the Red Zone to 100 sq km (roughly the size of Paris), however, it is still forbidden to enter or use the land for agriculture. This was



Figure 4. Archive image from a WWI battlefield in France. Credit: [Olivier Saint Hilaire, 1918](#)  
Credit: Wikimedia Commons



*Figure 5. Verdun battlefield showing the impact of shelling some 85 years after World War I ended. Credit: Wikimedia Commons, 2005*

naturally a [huge loss for local farmers and local residents](#). After all, before the area near Verdun became a battlefield, it was a developed agricultural region dotted with small villages. As a result, the temptation to resume agriculture and thereby support the country's economy, was very strong. Farmers in the Yellow and Blue Zones still risk their health to this day, inadvertently encountering unexploded munitions, remnants of a century-old war. Although mine removal work is ongoing, local authorities estimate that it will take 300-700 years to completely clear the area at the current pace. The scale of

pollution and soil damage in certain areas of eastern and southern Ukraine that occurred in spring 2022 during the Russian-Ukrainian war are no smaller than the scale of WWII events near Verdun.

Regardless of economic status, millions of hectares of mined land remain off limits around the world in North Africa, Asia, South America, and Europe.<sup>3</sup> In Libya, for example, fully one-third of the country's land still contains unexploded munitions and mines dating back to World War II.<sup>4</sup>

Usually, nations that are home to landscapes seriously damaged



by shelling offer alternatives to “munitions farming” and remove such lands from cultivation. For example, France made this choice in 1918, as did Balkan countries after the war in 1999; respectively withdrawing 120,000 ha and 2.5 million ha of land from agricultural use. Chemical and radioactive contamination of soil and water are addressed in different ways in different places. In some places, “red zone” vegetation and soils have not recovered after more than a century of waiting.

That said, some plants have succeeded in recapturing spaces once under human cultivation, and the munitions craters became part of the landscape, filling with water and forming new habitats in places where humans have not set foot for many years (see Figures 4 & 5).

Rehabilitating land broken by sinkholes is expensive and resource-intensive, and such decisions must be based on an analysis of the density and severity of damage. The “let nature recover naturally” scenario is low-cost.

In 1986, the government in Vietnam decided to protect forests damaged by chemical attacks during the Vietnam war (when the United States sprayed dioxin from airplanes) and established the Nui Cam Nature Reserve. A team of scholars has been focused on [restoring Vietnam’s forests](#) to the territorial extent of their growth before the 1940s, while

maintaining a commercial reserve. They achieved this goal in 2010.

Allowing munitions-damaged soil ecosystems to recover naturally is the most prudent for areas of Ukraine where the landscape will have suffered the greatest damage during this war. The alternatives are extremely resource-intensive and success is questionable. We will briefly examine a few of them.

## Recultivate

Tracking pollution levels over such enormous areas is unlikely to be feasible for many years in the future and comes at a significantly greater cost than mine removal. It’s inevitable that some of the lands will be extensively contaminated, but it will be difficult to pinpoint them using laboratory studies. On the other hand, using such lands for agricultural purposes before careful research puts consumers at risk when products containing chemically polluted grains and vegetable oil are exported or used domestically.

## Biofuel

Biofuel agricultural production on contaminated land is similarly problematic. Pollutant migration from soil to biofuel crops is poorly understood, and it is impossible to guarantee compliance with biofuel quality standards and safe production for the same reasons as described above in the risks for recultivation.



## Construction

There is also the option to develop damaged landscapes: building housing, infrastructure, and industrial sites. In those cases, the land will require careful de-mining work over large areas and, again, it will be impossible to guarantee safety in such locations, perhaps for centuries. Moreover, urban planning requirements in the windy and arid steppe zone necessitates siting settlements in river valleys, where they will be protected from the wind and naturally more humid. Most of the battle-damaged areas are on arable land situated on windy, undefended plains. The gradual transport of pollutants through ground water will also result in progressive worsening of water quality in all natural water sources in the zone surrounding the battlefield.

Creation of no-go “red zones” will simultaneously fulfill current Ukrainian legislative requirements regarding land conservation and desertification prevention. In addition, the [“EU 2030 Biodiversity Strategy”](#) provides for the removal of 30% of all EU agricultural land from cultivation. This strategy is a strong opportunity to protect and restore Ukrainian lands. Incidentally and compared to other European nations, Ukraine has significant long-term experience in removing contaminated land from cultivation: the Chernobyl Exclusion Zone, an area which, prior to the 1986 explosion, consisted of fields managed by collective farms. Today, the zone has become not only the largest green area in the heart of Europe, but is also Ukraine’s newest but largest biosphere reserve •

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1 Military actions in eastern Ukraine are a civilizational challenge for humanity [Военні дії на сході України — цивілізаційні виклики людству]. L'viv: Environment. People. Law., 2015. — 136 p.

2) Derevyanchuk A. and M. Shelest. Artillery weapons and ammunition [Дерев`янчук А. Й., Артилерійське озброєння і боеприпаси]. Sumy: Sumy State University, 2010. – 415 p.

b) A. Westing et al. Explosive Remnants of War. Mitigating Environmental Effects. 1985. P. 121

3 Westing AH, editor. Explosive remnants of war: mitigating the environmental effects. London (UK): Taylor & Francis; 1985.

4 Sgaier K. Explosive remnants of World War II in Libya: impact on agricultural development. In: Westing AH, editors. Explosive remnants of war: mitigating the environmental effects. London (UK): Taylor & Francis; 1985. p. 33-7.



# 20 plants that could disappear because of Russia's invasion of Ukraine

By [Oleksii Vasyliuk](#)

**B**iologists have compiled a list of 20 plant species at risk of extinction due to Russia's invasion of Ukraine. All of these species are extremely rare and currently grow only in areas affected by the fighting.

The extinction of rare species is not limited to Madagascar, Australia, or the islands of Indonesia. Plants, animals, and fungi are disappearing in all regions of the planet. Extremely rare species are also under threat in Ukraine, especially during the war.

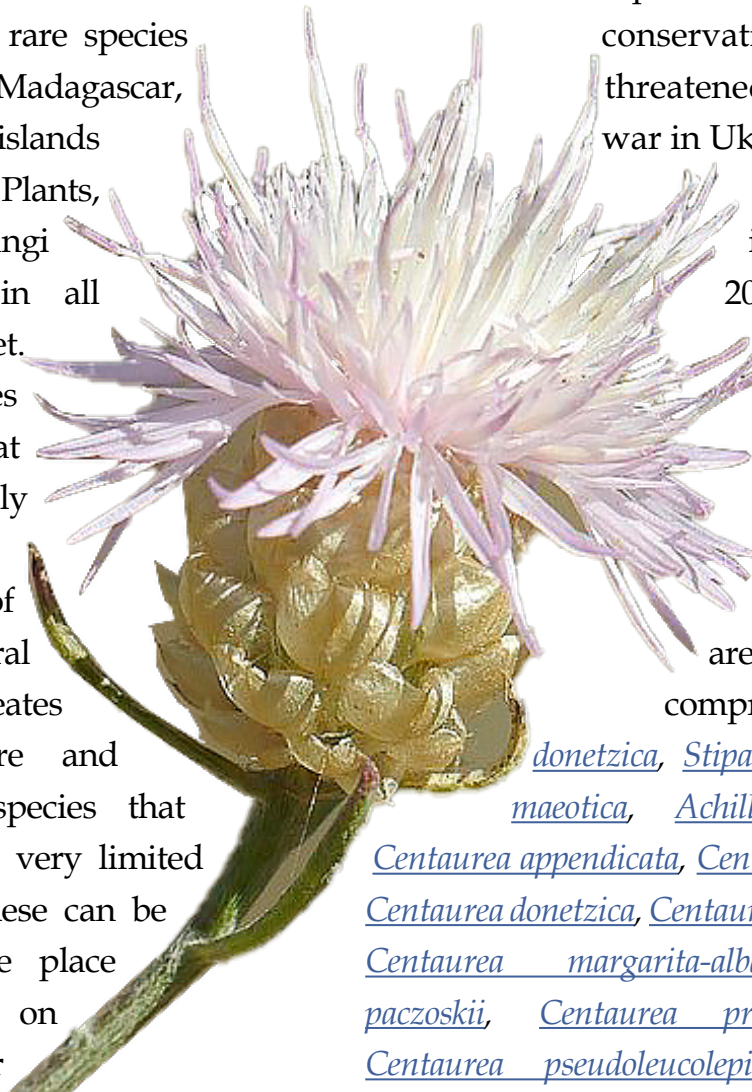
The diversity of Ukraine's natural landscapes creates conditions for rare and endemic species: species that are distributed over very limited areas. Sometimes these can be found only in one place and nowhere else on the planet. It is their

presence that makes Ukraine's nature unique, different from all other world regions. If we lose endemic species in their natural habitats, we lose them forever.

Experts of Ukrainian Nature Conservation Group have compiled a list of rare plant species whose conservation has been threatened by Russia's war in Ukraine.

The list includes 20 species of herbaceous plants, known to the world by their Latin names, which are difficult to comprehend:

[\*Stipa donetzica\*](#), [\*Stipa fallacina\*](#), [\*Stipa maeotica\*](#), [\*Achillea glaberrima\*](#), [\*Centaurea appendicata\*](#), [\*Centaurea breviceps\*](#), [\*Centaurea donetzica\*](#), [\*Centaurea margaritacea\*](#), [\*Centaurea margarita-alba\*](#), [\*Centaurea paczoskii\*](#), [\*Centaurea protomargaritacea\*](#), [\*Centaurea pseudoleucolepis\*](#), [\*Tragopogon\*](#)





*Satellite image of virgin steppe areas around Opuksky Nature Reserve ( coordinates: 45.072198, 35.957539), image fragment 600 m x 1000 m; 2019. The image shows that there is almost no vegetation in areas where munitions explosions occurred. There is a gradient of dispersed chemical components from the projectile around each crater, and the closer to the crater, the fewer plants occur. For this reason, there is almost no vegetation in places where a lot of explosions have taken place.*

*[donetzicus](#), [Lepidium syoaschicum](#), [Astragalus borysthenticus](#), [Erodium beketowii](#), [Phlomis scythica](#), [Thymus kaljmijussicus](#), [Rhinanthus cretaceus](#) and [Scrophularia granitica](#).*

In plain English these are rare and endemic species of feather-grass, thyme, thistle, geranium, figwort, rattle, aster and cock's-head(milkvetch) – tangible manifestation of that very “biodiversity”, which is so much talked about by politicians and media, without understanding how it looks like.

These are all inconspicuous species, not often mentioned in writing, and their destiny is of interest only to biologists

and conservationists. At the same time, they are all listed in the Red Book of Ukraine and each of them is protected by law. Extinction of any species of living organisms is a great loss for nature. But when poorly studied species disappear, such as almost all the species listed here, it is also a great loss for science.

## **Why do we believe that the preservation of rare species in Ukraine is threatened by Russia’s military invasion?**

Military action causes a number of effects that are detrimental to vegetation,



fungi, and lichens. Here are a few examples:

- Destructive effects of explosions, passing of military equipment, and construction of fortifications
- Forest fires resulting from munitions use and virtually impossible to extinguish during active conflict
- Chemical pollution, especially soil contamination with sulfur, which, together with water, forms sulfuric acid that, in turn, destroys seeds and roots

An analysis of Russian military exercises on Crimea Ukraine's Kerch Peninsula illustrates the long-term impacts of chemical pollution from explosions. These pollutants have impacts comparable to concentrated acid rain.

Physical impacts of explosions and machinery pose long-term threats. Disturbed vegetation cover will cause erosion and change the hydrological regime. Affected areas also produce hotspots for invasive plants, which take over damaged grounds much faster than local vegetation.

As a result, military action directly destroys vegetation and indirectly destroys natural ecosystems. For rare and endemic species, each of which requires unique and specific growing conditions, such changes can prove fatal. Destruction of those exact habitats where each of the listed species occurs can mean its extinction in that area.

It is also noteworthy that these at-risk species are almost exclusively residents of steppe landscapes which, due to large-scale plowing, have been deprived of almost all areas where they can still grow (no more than 3% of the original steppe ecosystems remain in Ukraine). We can only hope the conflict will not affect these unique habitats.

For example, many populations of short-headed cornflower (*Centaurea breviceps*) and Paczoskii cornflower (*Centaurea paczoskii*) grow on Kinburn Spit, an area affected by large-scale fires resulting from the fighting over the past 2 months.

False white cornflower (*Centaurea pseudoleucolepis*) and naked yarrow (*Achillea glaberrima*) are found only in an incredibly small area of the Stone Graves Nature Reserve in Donetsk Region. Fortunately, for now that area has been spared by the war. For example, Figure 4 shows the distribution of short-headed cornflower in Kinburn and in the Lower Dnieper Sands and the areas that burned in fires in April 2022 alone.

The list above only includes species listed in Ukraine's Red Book. Reserve territories are created to protect them and their destruction is a punishable offense. There are, however, other rare biological species that are only found in this danger zone, and we plan to compile lists of them in the near future.

The list also excludes Crimean species, although Crimea is the largest

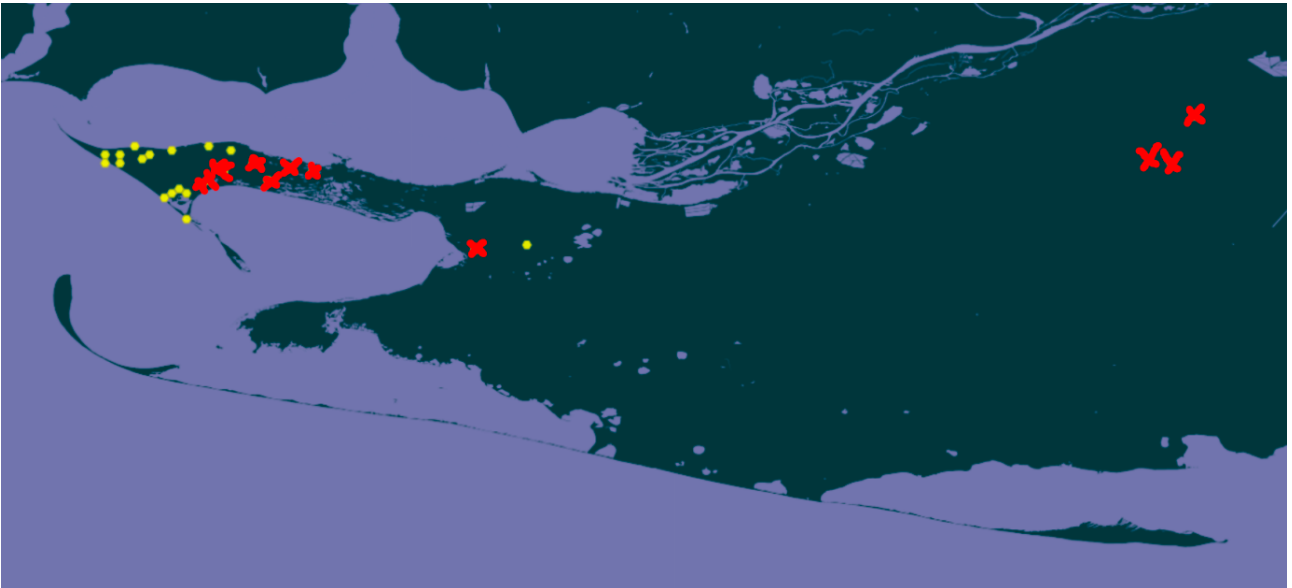


Figure 4. Distribution map of short-headed cornflower (*Centaurea breviceps*). Source: [GBIF](#). Yellow indicates known occurrences of the species in the wild, red indicates occurrences of the species burned in April 2022.

centre of endemism in Ukraine; many rare species found in Crimea cannot be found anywhere else in the country. 44 plant species occur only on the peninsula and nowhere else in the world. For the moment, there is no fighting in Crimea, and we hope that a peaceful de-occupation of the peninsula will eventually happen.

*Endemic species are vital for conserving biodiversity, without which we will not be able to adapt to climate change. UWEC Work Group will continue to monitor and analyze the impacts of Russia's military invasion of Ukraine on biodiversity and wildlife conservation. •*





# Environmental lawlessness during wartime

By [Eugene Simonov](#)

**D**uring periods of socio-economic crisis and war, governments and the largest business lobbies often seek to relax environmental requirements in order to reduce business costs.

The belief that the surest way to overcome the crisis is to increase negative environmental consequences is a direct holdover of the extensive economic development that led humanity to our current ecological crisis at a planetary level. In addition to the looming [food crisis](#) and prolonged pandemic, the

war in Ukraine has strengthened the influence of interest groups seeking to weaken environmental laws around the world. In Russia, this trend is particularly powerful, as the war and sanctions have intensified and accelerated a long-standing process of de-greening legislation and curtailing environmental control.

In spring 2022, Russian environmental associations have focused almost solely on fighting attempts to weaken environmental legislation and oversight. In May, Russian Socio-Ecological Union (RSEU),



the country's largest environmental association, published an overview of [the trends degrading the environmental legal and regulatory framework](#). The report highlights the following trends:

1. Reducing mandatory requirements for ensuring environmental safety,
2. Complicating access and depriving citizens of the right to participate in issues related to nature and habitat protections,
3. Reduction of state oversight over the activities of environmentally hazardous facilities,
4. Reduction or cancellation of the legislative ban on economic development of protected areas and requirements for forest conservation, and
5. Extension of deadlines for federal environmental projects and state programs beyond the responsibility of the current generation of officials.

Changes in legislation that worry environmental activists today span a wide range of issues, from weakening environmental impact assessments (EIA) and public participation in municipal development to allowing waste incineration and intensifying logging around settlements. In some instances coordinated opposition of environmental NGOs and the expert community resulted in preventing

harmful legislative innovations, but responsible agencies are busy preparing new assaults on key aspects of environmental law and management.

## **Shrinking of the State Environmental Impact Assessment**

On June 18, the [«We Live Here»](#) Movement hosted the Russian Environmental Safety 2022 conference for activists. Many grassroots groups from across Russia came together in 2019 to create this movement to defend the right for a clean environment as enshrined in the Russian Constitution. Many environmentalists spoke of the haste with which environmental regulations are being canceled or weakened by the government.

Aleksandr Fedorov, a member of the Russian Ministry of Natural Resources and Ecology's Public Council dedicated his opening speech to highlighting weakening procedures for state environmental assessments (SEIAs or «expertizas»). He touched on other efforts to:

- Reduce the scope of specific SEIAs;
- Dilute the range of issues addressed by SEIAs;
- Decrease the importance of SEIAs in decision-making;
- Limit civil society participation during SEIAs and other assessments; and



- Depriving citizens of the right to organize public environmental impact studies.

Since the beginning of this century, the Russian government has repeatedly and with some success attempted to render the institution of SEIA and the process for conducting Environmental Impact Studies (OVOS in Russian) meaningless. In recent years, many types of undoubtedly dangerous projects have been exempted from SEIA procedures, for example hydroelectric power stations. In 2022 the process for abolishing administrative «barriers» has significantly broadened and accelerated.

For example, [legislative bill #120074-8](#), sponsored by lawmaker Alexander Kogan, proposes to narrow the SEIA process for projects of any level of environmental risk to a simple compliance check for indicators of best available technologies included in reference books. Experts often express well-justified criticism with regard to the environmental friendliness of these books, which are often compiled by self-interested businesses. As a result, today's mandatory requirements for evaluation and listing of potential consequences for public health and the environment would be eliminated. The bill also aims to deprive civil society groups of the right to conduct a parallel «public environmental review»<sup>1</sup>. Violating the basic constitutional rights

of citizens increases corruption risks associated with the construction of environmentally risky facilities.

The Russian Ministry of Natural Resources and Ecology has proposed legislation entitled «On Amending the Federal Law 'On Environmental Impact Assessments' and Other Legislative Acts of the Russian Federation». The draft bill would eliminate the use of SEIAs to evaluate environmental disasters and emergency situations, a move which could result in an end to an entire chapter of the Federal Law «On Environmental Protection» (Chapter VIII «Zones of Environmental Disaster, Emergency Zones»). A series of provisions in the Federal Law «On the Protection of the Public and Land from Natural and Man-made Emergencies» would also be struck down.

Another bill [«On Amendments to the Russian Federation Urban Planning Code»](#) (No. 02/04/05-22/00127256) proposes to leave the need for conducting SEIAs at the discretion of the «developer, technical customer, or other persons» on design documentation for any transport infrastructure facilities in Russia's Exclusive Economic Zone, on the continental shelf of the Russian Federation, in inland waters, in Russian territorial seas, within the boundaries of protected areas, the Baikal natural territory, and in Russia's Arctic zone, replacing them with expert support.



According to Fedorov, the number of proposed amendments undermines the foundations of Russian laws on the rights of citizens to a healthy environment and protection of their health and life.

## Legislating with a rubber-stamp

Since 24 February 2022, several legal derogations have already been adopted.

The Russian Ministry of Construction, [Housing and Utilities issued Order No. 46](#) (March 11, 2022), allowing the State Office for Examination of Construction Projects («Glavgosexpertiza») to abolish the requirement to conduct «State construction project assessments», in order to receive permission for

«preparatory construction works as well as introducing a moratorium on issuing negative conclusions in those assessments conducted on project documentation. Such state assessments are the only remaining means to control the quality of projects that are exempt from the SEIA.

[Federal Law 58 „On Amendments to Certain Legislative Acts of the Russian Federation“](#) was enacted on 14 March. This law seeks to ease the way for businesses affected by sanctions and suggests that master plans and municipal development projects can now be approved without public hearings or public discussions. Moscow and the Moscow region have already



taken advantage of the new rule in order to limit public participation in the discussion of development plans.

## Civil defense in action

Virtually every attempt to weaken regulations provokes public opposition, although the opportunities for protest are significantly limited in wartime. Nevertheless, there have already been cases where the authorities' appetite for weakening laws has been moderated by civil society's effective actions.

When first drafted, [Federal Law No. 124](#) (enacted 1 May 2022) was aimed at simplifying the development of priority infrastructure projects. An early draft abolished State Environmental Impact assessments for construction in federal protected areas.

– If the law were adopted in this form, it would allow removal of land from regional protected areas for any type of infrastructure use except residential construction, – Mikhail Kreindlin, a representative of Greenpeace Russia, commented during an [interview with Vedomosti](#). – It could be a ski resort, tourism or sports development, mining enterprise, oil and gas infrastructure, or a road,» the environmentalist continued. «It is currently forbidden to build any of these objects within a protected area.

Thanks to wide public outcry and active engagement by the Coordinating Council for Environmental Welfare under the Civic Chamber of the Russian

Federation, these provisions were excluded from the final version of the law. However, as approved, the law now permits construction of oil and gas pipelines and roads within federal protected areas without an SEIA. The process for cultural and archaeological evaluations was also simplified, essentially eliminating the requirement to identify new archaeological monuments on the territory of planned infrastructure projects.

## Waste not, want not

Arkhangelsk activist Anastasiya Kochneva, member of the [42 Environmental Movement](#) coordinating council, spoke to We Live Here conference participants about local waste management issues and possible solutions. In the end, she took time to explain why waste incineration is a bad idea. Although that seems to be a generally accepted concept, the State Duma has brought that assumption into question.

Duma Representative Alexander Kogan, who also serves as the «environmental» program chair for the All-Russia People's Front political coalition, an offshoot of the United Russia political party, sponsored [Federal Bill No. 116676-8](#). This bill proposes to define as «recycling» any conversion of municipal solid waste into fuel. If adopted, waste management operations could simply burn waste (releasing



dioxins and other toxic substances, as well as carbon dioxide) and collect payments for these services by the very population the pollutants are harming. This is a continuation of [decades of attempts](#) by self-interested businesses and officials to legalize residential waste incineration. If they achieve their goal, it is likely to bring the entire multi-stream waste collection and recycling industry to an end.

In wartime, other paradoxical manifestations of lawmaking took wing, some proposed even before 24 February. On 24 May 2022, [Bill No. 79874-8 «On livestock by-products...»](#) was adopted in its first reading (there are customarily three readings). The bill, now awaiting its second reading, essentially offers agricultural enterprises «indulgences» for polluting fields with fresh manure, a direct threat to human health and environmental quality. And again, the Coordinating Council for Ecological Welfare at the Civic Chamber of the Russian Federation, the All-Russian People's Front and the Russian «Greens» Ecological Party published a joint open letter describing the environmental consequences of the bill's adoption. Dozens of environmental organizations are calling for changes or withdrawal of the bill from consideration.

Duma [Bill No. 131312-8](#) «On Changes to... Federal Law 'On Environmental Impact Assessments'» seeks to change the law as it relates to landfill reclamation

and prevent «redundant» SEIAs for waste management complexes. The bill envisages «eliminating the requirement to conduct discussions with citizens and public associations ... of materials for assessing the impact of an object of State Environmental Impact Assessments, as well as providing materials for such discussions as part of the materials subject to SEIA.»

Although waste management practices have been problematic for decades in Russia, especially with the rise of single-use packaging, it is only in the last few years that it has become a hot-button issue. Many effective protest movements have recently sprung up across Russia precisely because government authorities (illegally) neglected to solicit citizen input regarding waste management. If the bill is passed, it will add fuel to the fire.

The government has deliberately limited law enforcement activities to comfort businesses during war-time and this leads to an increase in violations. At the Russian Environmental Safety 2022 conference, Alexander Kolotov, a member of the Public Council under the Federal Water Resources Agency, [spoke about recent developments in placer gold mining in Russia](#). «The extraction of gold directly in riverbeds produces only about a quarter of Russia's annual production, but is responsible for the destruction of river valleys and the pollution of many thousands



of kilometers of river channels,» he stressed.

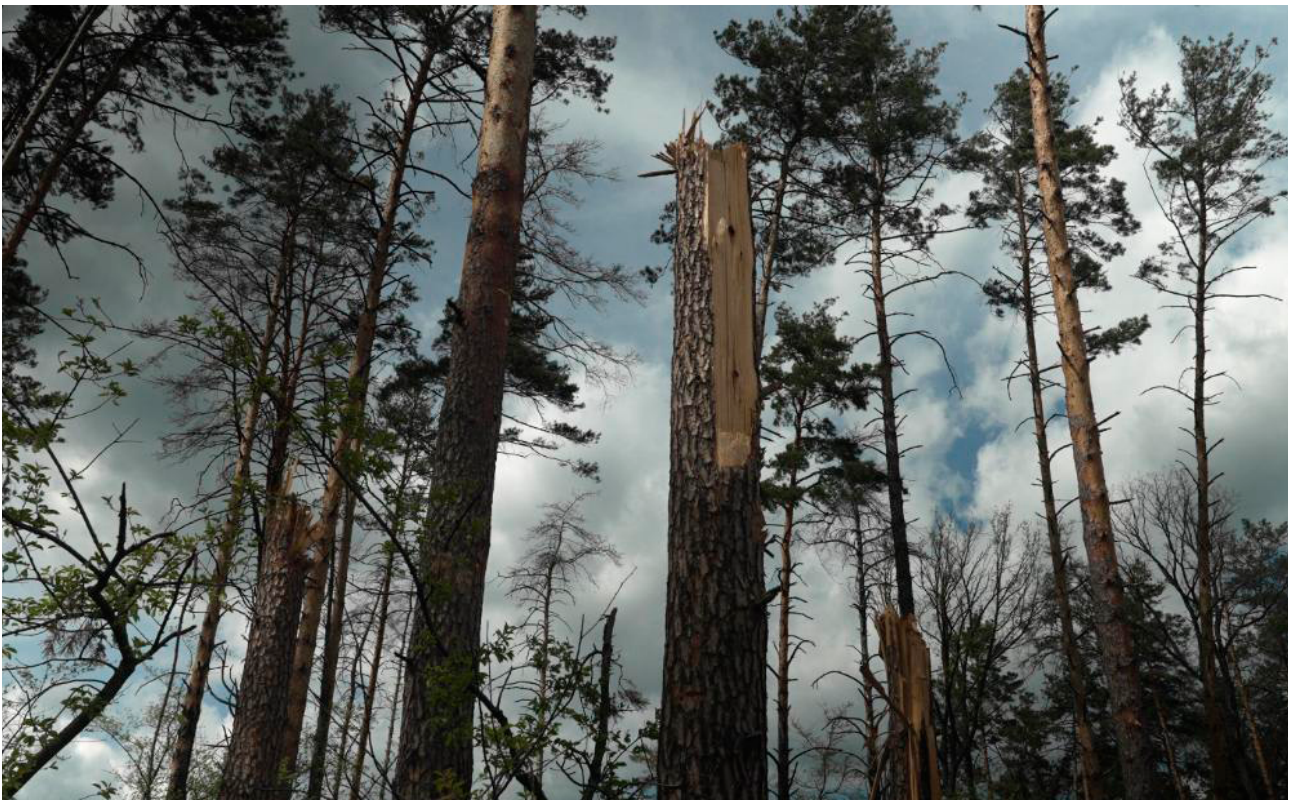
According to Kolotov, a long-time leader of public monitoring of placer gold mining, during today's war these negative impacts not only did not decrease, but even increased. In just eight Russian regions, 85 individual pollution sites were visible from space, spreading over 3,000 kilometers of watercourses from mid-May to mid-June, the first month of monitoring placer mining operations in 2022. In the future, the situation will only worsen as government agencies are under orders to «reduce pressure» on all economic activity.

In early March, the Russian government decreed ([No. 336 «On the features of the organization and implementation of state control](#)

[\(supervision\), municipal control»](#)) that in 2022 planned oversight activities and scheduled government inspections will not occur, and unscheduled monitoring will only be carried out in «exceptional circumstances», for example, when business activity poses a threat to people's lives or national security.

Today, activists' letters to oversight agencies receive non-committal replies, whereas in past years state inspectors conducted site visits and often punished violators. Kolotov proposed to cancel and rewrite a number of regulations in order to avoid record-setting damage to nature and the local residents.

In order to meaningfully rewrite laws, the State Duma needs to have reliable information about the effectiveness of law enforcement, and yet that is not in the government's interest. So on 15 June,





when Minister of Natural Resources and Ecology Alexander Kozlov gave testimony to the State Duma on the efficient use of mineral resources, representatives inquired what he was specifically doing to revoke licenses from placer gold mining enterprises that harm nature.

Kozlov [cited an example](#) in Kamchatka Krai: «We worked with local authorities and companies. Their licenses were revoked, and salmon spawning rivers received protected status to be sure no one can encroach on these places. Legally, everything can already be monitored and regulated. If desired.»

Our review of that case showed that the minister demonstrated wishful thinking: despite the stormy promises that followed public protests against the destruction of the rivers two years earlier, the promised river protected areas have not been created in Kamchatka, and license-holding mining companies await an opportune moment to start mining in salmon river floodplains. Thus, adoption of inadequate and weak legislation and amendments by legislators is accompanied by frequent disinformation that «everything is under control» from ministries and agencies.

## Diagnosis: worse, not new

The bills listed above are just the tip of the iceberg. [According to the Zeleny Zmiy](#), a Telegram channel specializing in insider information on environmental

governance, the Ministry of Natural Resources (and Ecology) developed a plan back in March to accelerate «anti-crisis» amendments to federal laws: new rights to use subsoil resources without a competitive bidding process, facilitate land allocation for recreational activities in protected areas, and other «incentives for economic development.» At the same time, the Ministry also delayed development of «commercially burdensome» legislative bills toughening Extended Producer Responsibility (EPR) for the entire life cycle of manufactured goods, creation of reclamation funds for subsoil users, and equipping factories with automatic control systems to be compliant with emissions quotas.

Very few of the derogation acts are actually directly related to an inability to comply with environmental regulations related to the war, for example, due to international sanctions. This likely includes [Russian governmental decree No. 855](#) (12 May 2022), which allows production of «Ecological Class 0» cars. Compared to the current Euro 5 standard, «Class 0» allows gasoline-fueled cars to increase emissions of toxic hydrocarbons, nitrogen oxides, and carbon monoxide almost threefold. Given the enormous share of transport emissions in urban pollution, widespread production of such vehicles could end plans for implementation of Russia's National Clean Air project and





have an extremely negative impact on public health.

Many of these attempts to undermine environmental legislation have a long backstory rooted in corruption, and the war is just a pretext to pass off these bills as «very pressing». Each industry has its own interest groups seeking to snatch natural resources under the pretext of overcoming «temporary difficulties.»

Forestry is no exception. Under the guise of protection from the threat of breakover fires, Federal Bill [«On Amendments to the Forest Code to Prevent the Spread of Forest Fires»](#) would allow clearcutting timber in protected forests and protected forest areas adjacent to settlements and economic facilities.

UWEC Work Group [recently wrote](#) about an initiative by the Russian Ministry of Defense to provide for the construction of wooden fortifications with permission to conduct unlimited logging in any location. According to [RSEU experts](#), past experience and the current extent of criminality in the forestry industry increases the likelihood of a loss of control during planning and logging, with the potential to provoke massive forestry violations and provide convenient conditions for developing land around population centers.

There is every reason to expect that as temporary challenges deepen, government authorities across Russia

will not only take broad advantage of these varied new gaps in federal legislation, but will work creatively to extend derogation of environmental regulations and procedures to the regional level.

## **Environmentalism for the future**

Since the war began, national projects and state programs have frequently been postponed.

The main goals of the Clean Air federal project have been postponed. Implementation of key reform indicators in waste management is also being steadily delayed until a later date. Achievement indicators for the processing of municipal solid waste are set for 2030, while the «100% extended responsibility» program for container and packaging manufacturers has been postponed year after year. Despite a reduction plan, the number of landfills only continues to grow. Various permits for discharges, emissions, and other negative environmental impacts that previously required periodic re-approval are now automatically extended.

Meanwhile, Russia has a wealth of old Soviet industrial infrastructure breathing its last and requiring vigilant oversight. For these, large investments are needed in order to avoid accidents and disasters. One interviewed expert who wished to remain anonymous



suggested that the recent series of accidents, explosions, and fires that have become more frequent across Russia since March 2022 is most likely due to weakening state control and resource users' failure to properly care for resources rather than being caused by the mythical «Ukrainian saboteurs» currently being blamed for these troubles.

### **It's all fine, just fine ...**

Public statements by significant government officials about «preventing weakening of environmental measures» and condemning the creeping de-environmentalization of Russian reality are particularly tragicomic in this context.

Chair of the Ecology and Natural Resources Commission of the State Council of Russia [Gleb Nikitin commented](#) to Rossiyskaya Gazeta, «In no case should loosened industry regulations worsen the environmental well-being of people.»

Minister Kozlov concluded an extended [interview with Kommersant](#) newspaper by saying, «Environmental requirements for users of natural resources remain unchanged! No one is

going to turn a blind eye to violations of environmental law and regulation! On the contrary, these new economic conditions will help to peel back the „green camouflage“ for many and enable them to show their true attitude to the environment.»

On 17 June, at the St. Petersburg International Economic Forum on 17 June, [President Putin stated](#), «...we will develop clean technologies in order to achieve our goals to environmentally modernize enterprises and reduce harmful atmospheric emissions, especially in large industrial centers. We will also continue to work within a framework of closed-loop economic projects, „green“ projects, and climate protection...»

A little later, he expressed himself more realistically, saying «Listen, in today's conditions each agency, each country overall is considering how to avoid certain costs. It's absolutely natural. You have already mentioned several countries, but this all applies everywhere without exception.»

In general, Russia's top leadership is aware of the descent into the proverbial abyss, but they continue to pretend that it's all going according to plan. •

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<sup>1</sup> Russia's Law "On State EIA" grants NGOs the right to review Environmental Impact Studies and other materials submitted by project proponents to the State EIA. The State EIA Commission must take note of the verdict of the "public EIA" and respond to issues raised by the public in its own final State EIA Decision.



# Does REPowerEU Reinforce or Contradict the Green Deal?

By [Eugene Simonov](#)

To reduce reliance on Russian oil and gas the European Union created a bold REPowerEU plan intended to diversify supplies and hasten the clean energy transition beyond targets recently set by Green Deal legislation. The €210 billion plan includes diverse measures from building more gas infrastructure to development of large-scale transnational trade in hydrogen, and from doubling the rate of heat pump deployments to expediting and simplifying the permitting process for renewable energy (RE) projects. Proposed weakening of environmental assessment requirements for RE infrastructure built in “go-to” areas considered most suitable for

such development provoked vocal but constructive criticism from many NGOs and experts fearing this may result in massive encroachment on protected areas and biodiversity hotspots. They argue that the biodiversity and climate crises should be addressed in a coordinated manner and there is no need to roll-back the Green Deal’s conservation commitments to achieve climate goals. Such reaction also shows that weakening conservation legislation and public participation procedures in the name of RE development may in fact further weaken public acceptance of the REPowerEU plan and delay its implementation.

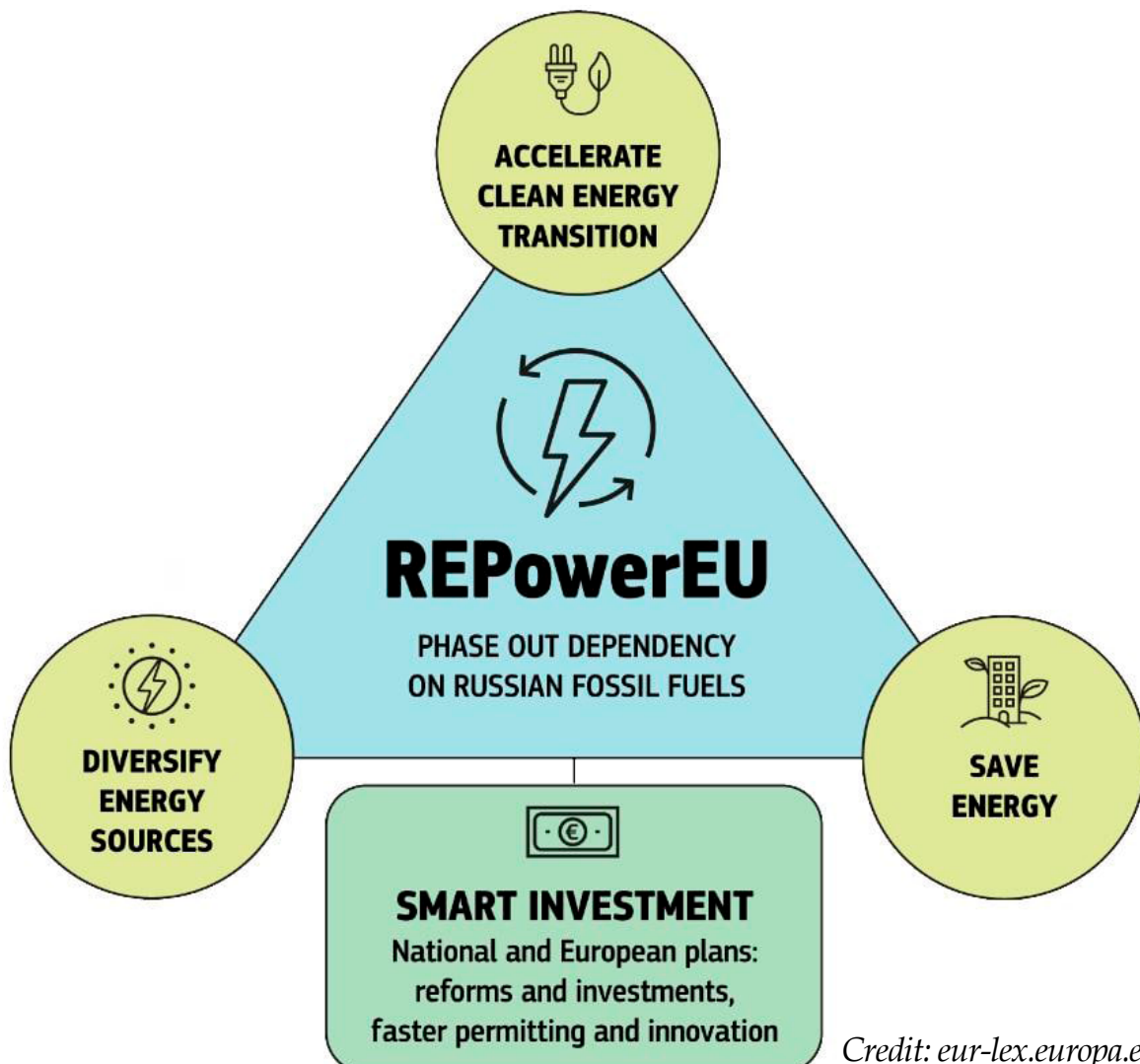


## REGreening the Green Deal?

According to the European Commission (EC), 85% of Europeans believe that the [EU should reduce its dependency on Russian gas and oil](#) as soon as possible to support Ukraine, thus adding urgency to the search for energy alternatives. [The European Union responded](#) in March with a promise to develop a REPowerEU initiative to kill two birds with one stone – reduce both energy trade with Russia and the EU’s dependence on fossil fuels. Given the EU’s prominent role in the

global economy and politics, this could be seen as the world’s “make it or brake it” moment in eliminating fossil fuel dependency in times when progress in the energy transition is [stagnating](#) globally.

A [multi-pronged ambitious plan](#) to achieve these two objectives was announced on May 18 and consists of energy savings, diversification of energy supplies, and an accelerated rollout of renewable energy. The plan adds to the already extensive obligations of the “Fit for 55” package of the EU Green Deal legislation.



*Credit: eur-lex.europa.eu*



**Energy savings** are the most immediate way to face next winter's challenges. The Commission proposed to increase the binding Energy Efficiency Target from 9 to 13% under the Fit for 55 package and published an "[EU Save Energy Communication](#)" urging behavioural changes which could cut gas and oil demand by 5%.

**Diversification of international supplies** of oil, gas, and hydrogen through the new [EU Energy Platform](#), will enable development of a joint purchasing mechanism on behalf of participating Member States. Limited additional gas infrastructure, estimated at around €10 billion of investment, will be supported to compensate for the future loss of Russian gas imports. Many [observers doubt](#) that replacing Russian gas with gas from the US or the Persian Gulf will result in a global decrease in greenhouse gas emissions (GHG).

The [EU External Energy Strategy](#) seeks to achieve diversification and "greening" of energy supplies from other countries, including cooperation to help partner countries to acquire green technologies. Major hydrogen corridors will be developed with partners from northern Africa and other regions. The EU will also support Ukraine, Moldova, the Western Balkans, and Eastern Partnership countries, among others, by launching the REPowerUkraine initiative that will help ensure energy supply and rebuild the Ukrainian energy

sector after the war. The EC claims that the Strategy demonstrates the EU's commitment to the global green and just energy transition. Some activists call this plan a "[neo-colonial resource grab](#)", arguing that partner countries in the Global South would need to sacrifice their current plans under the Paris Agreement in order for Europe to meet its goals.

The EU also plans a massive scaling-up and acceleration of renewable energy in power generation, industry, buildings, and transport to strengthen energy independence, boost the green transition, and reduce prices over time. The Commission proposes to increase the headline 2030 target for renewables from 40% to 45% under the Fit for 55 package, including such measures as:

- The EU Solar Strategy to double solar photovoltaic capacity by 2025 and install 600GW by 2030
- A Solar Rooftop Initiative with a phased-in legal obligation to install solar panels on new public and commercial buildings and new residential buildings
- Enhancing energy savings and efficiencies in the transport sector addressed in Greening of Freight Package (yet to be finalized)
- Doubling of the heat pump deployment rate
- Enabling production of 10 million metric tons of domestic renewable



hydrogen and 10 million tons of imports

- A [Biomethane Action Plan](#) to increase production to 35 billion cubic meters by 2030, including through the Common Agricultural Policy

The EC believes that implementation of REPowerEU's objectives requires an additional investment of €210 billion over the next 5 years, while cutting Russian fossil fuel imports can save the EU up to €100 billion per year.

Finally, the Commission issued a formal [recommendation](#) to **expedite permitting for major renewable projects** and suggested a targeted [amendment to the Renewable Energy Directive \(RED\)](#) to recognize renewable energy as an "overriding public interest." The Commission proposes to identify "go-to areas" in all EU Member States as the most suitable places for deploying renewable energy projects. The Commission further proposes that dedicated environmental impact assessments and public consultations, as well as the "appropriate assessment" under the Habitats Directive for issuing permits for specific RE projects would no longer be required in those areas.

## REPowerEU package and environmental rollback

Naturally, the plan is being widely discussed and often criticized by experts, activists, and politicians.

Some say it lacks ambition and has too many vague objectives, others argue it is overambitious in many parts and lacks realism. The most concerted criticisms, however, were directed at the recommendation to streamline the permitting process.

**Climate Action Network (CAN) Europe** said that it [welcomes the Commission's proposal](#) to increase the 2030 EU targets on renewable energy and energy savings. However, CAN advocates more ambitious goals to be on the safe side with regards to the Paris Agreement – 50% and 20% respectively – with measures going beyond short-term behavioural changes, enabling a full energy system change and reducing energy demand in the midterm and beyond. Moreover, acceleration in the deployment of solar and wind energy should not come at the [cost of biodiversity protection](#) nor of effective engagement of citizens and local communities. "[CAN Europe's assessment 'RepowerForThePeople'](#)" proves that the EU can wean off Russian gas by 2025 without funding new gas imports elsewhere. All of that additional investment should support the just energy transition to achieve it," said CAN Europe's Energy Policy Expert Elif Gündüzyeli.

Reacting to the proposal, [ClientEarth](#) lawyer Anna Heslop stated, "We agree that unnecessary obstacles must be removed – but Europe's nature laws are



not among them. In the midst of a global biodiversity crisis, it is incomprehensible that the Commission would choose to seriously undermine the laws that protect the EU's most valuable natural places and wildlife. The Commission knows full well that this law is also part and parcel of tackling the climate crisis. We cannot save the planet and secure our future without fighting both battles. ...We are extremely disturbed about the implications of this proposal and will be considering this issue further."

**Friends of the Earth Europe** are also deeply concerned that a blanket exemption on renewables from environmental impact assessments (EIAs) risks undermining what the EU has achieved and will facilitate deregulation. **Eilidh Robb, anti-fossil fuels campaigner at Friends of the Earth Europe** commented: "[Europe's external energy plans throw out hollow endorsements on renewable and energy efficiency solutions](#), while putting forward a plethora of plans to lock us into fossil gas for decades to come under the overinflated promise of a hydrogen future."

Sent five days before the REPowerEU announcement, a letter signed by [Greenpeace and 10 leading European environmental NGOs to Frans Timmermans](#), European Commission Executive Vice-President for the European Green Deal, stated: "Biodiversity and nature protection and

restoration are as important climate tools as renewable energies: the combination of RE Strategy and nature protection is the best chance we have to achieve climate neutrality." The NGOs argued that the EC proposal would allow a rollback of environmental regulation, ignore citizen voices by sidestepping consultation, and focus on renewables in protected areas when there are clearly so many better opportunities. Taken together, such actions will lead to major public outcry and be fundamentally counter-productive. Finally, the NGOs warn that weakening environmental regulations on behalf of renewables creates a precedent that will, in turn, risk being used tomorrow by industrial interests on raw materials and other issues.

This warning had no immediate effect, and on May 18th, the published REPowerEU proposal contained all original deregulation clauses intact.

Renewable industry associations by and large see amendments as a welcome opportunity to seize more natural areas for new development. **WindEurope CEO Giles Dickson** commented, "With REPowerEU's new permitting rules and ... Nature Protection Package, Member States now have a full picture of the [good working balance between biodiversity and renewables expansion](#). They now need to implement the REPowerEU measures on the simplification of permitting.... The Energy Ministers



of the 27 EU Member States meet next Monday 27 June and will have the chance to agree the changes to permitting rules the EU Commission have proposed to the Renewables Directive as part of REPowerEU. It's a great opportunity for them to inject momentum into the simplification of permitting."

Hydropower industry representatives, who often complain that the EU Water Framework Directive prohibiting deterioration of the ecological status of water bodies slows dam development, also see emerging opportunities to dam new rivers in Europe and elsewhere. In its 2022 [State of Hydropower Report](#) the International Hydropower Association mentions that, while introducing REPowerEU in March 2022, "the President of the European Commission emphasised the long-term need to switch to renewables, including hydropower."

European Commission bureaucracy efforts to pave the way for deregulation largely pre-date the Russian invasion in Ukraine and are based on evidence collection and consultations started on 18 January 2022, as well as two workshops held 16-17 February 2022 exclusively for the wind and hydropower industries. However, [results from these deliberations](#) do not decisively point to a need to weaken nature conservation legislation or public participation rules to accelerate energy development.

For example, out of 155 responses in consultations (112 of those submitted by

project promoters and their associations and only 9 by NGOs), 70 respondents indicated the length of administrative procedures, 62 noted grid connection issues, while only 44 marked competition with environmental regulations as among the most important barriers to RE development. Despite unequal representation of industry and conservation stakeholders in the "consultations", the results largely support the analysis of real setbacks to RE development presented in May by the European Environmental Bureau (EEB) (more below). Nevertheless the [Synopsis Report](#) from those consultations is the only "evidence-based" justification document that the EC attached to its [proposal to change the Renewable Energy Directive](#).

It is difficult to track how and when amendments threatening the conservation objectives contained in the Green Deal were inserted into the "[Amendments to Renewable Energy, Energy Performance of Buildings, and Energy Efficiency Directives](#)" proposed on 18 May. This EC proposal document includes a dangerous disclaimer: "Due to the politically sensitive and urgent nature of the proposal, no specific impact assessment was carried out." Given that the proposal attempts a substantive change in legislation, such an excuse can hardly be justified. Is the war being used as a smokescreen to push through prefabricated draft amendments, which





*Credit: eco-greenenergy.com*

in times of peace would be subjected to more thorough examination, including mandatory impacts assessment for proposed legislation on the EU's conservation objectives?

## What Should be Fixed?

The pros and cons that will result from REPowerEU and whether or not it will slow due to lack of climate justice and nature conservation safeguards depend on many variables and the future course of action that Member States will take. Some recommendations on resolving these issues have been already published by leading environmental groups.

[Alex Mason](#), **Head of Climate at the WWF European Policy Office** in mid-May noted, "Shifting toward a 100% renewable energy system is essential to

stopping climate change and increasing the EU's energy independence, but the type of renewables is also critical. Members of the European Parliament must therefore strengthen the proposed law by increasing the overall target, but also stop the scandalous practice of subsidising the burning of trees and crops for energy, and end all new hydropower development in the EU." "Speeding up permitting is a good idea and will inject new impetus to the ramp-up of wind and solar power across the EU," he said, "But the way to do this is to fix inefficient bureaucratic procedures, not weaken environmental legislation. Indiscriminate exemptions from nature laws for renewable energy projects could harm biodiversity and stir up public opposition, causing conflicts and further delays."



The only point to have been partially resolved after an extensive [NGO campaign](#), burning of solid biomass to produce energy was excluded from the REPowerEU package, while a proposal to [ban construction of new small hydropower](#) is now under consideration in the EU Parliament.

**Birdlife International Regional Director for Europe and Central Asia Martin Harper** [commented](#), “The new REPowerEU plan... contains much we can support but, shoots itself in the foot by introducing a blanket exemption from EIAs and appropriate assessments on #Natura2000 sites. We have work to do to shift this.” Birdlife representatives criticized the proposed top-down approach that aims to silence public opposition and suggested that a smarter engagement process is needed to address the real problems without undermining conservation efforts, public acceptance, and rule of law. Selection of go-to areas must be technology-specific, Birdlife argues. Defining go-to areas for wind and solar will also define electricity grids requirements, thus allowing for transmission capacity to be built faster. The experts note that the go-to areas approach is only relevant for wind and solar, as biomass impacts depend on feedstock more than location, and hydropower must be assessed at the river basin level.

**The European Environmental Bureau** stated that the REPowerEU package

includes backdoor proposals to water down key environmental safeguards under the guise of fast-tracking renewable permits. The European Commission proposes a blanket exemption from the evaluations set in the Environmental Impact Assessment Directive and the Birds and Habitats Directives for renewable projects in go-to areas that will be exclusively defined by Member States. This risks severe harmful effects to nature caused by poor planning.

The EEB issued a [policy briefing](#) highlighting the real top 10 barriers to renewable energy, including lack of skilled professionals, grid connections, and resource allocation. To scale up the deployment of solar and wind technologies, the EU would need to remove these and other bureaucratic barriers. This can and should be done through robust spatial planning (with go-to and no-go areas) and more resources for environmental authorities, not at the cost of weakening environmental legislation.

[“Environmental legislation is not an obstacle to the deployment of renewables.](#) In the midst of the biodiversity crisis, there is no justification to scrap key environmental assessments and set a dangerous precedent. Permit applications can be accelerated with more staff capacity, streamlined approaches, and real public participation, without undermining



*Credit: European Environmental Bureau*

fundamental nature and biodiversity safeguards,” said **Laura Hildt**, Policy Officer for biodiversity at the EEB.

**Green 10 NGOs (G10) and Euronatur insist:** “The way forward has to be a positive agenda of speed and scale of deployment of solar and wind renewables, with major opportunities around improved spatial planning in go-to areas. This should be done by removing bureaucratic barriers, not weakening environmental protection legislation. The focus should be on the urban and industrial areas first and then on EU land and sea outside of protected areas.”

“Go-to” areas are important, but these must be very well defined using a democratic process. Expediting permitting procedures for wind and

solar and related infrastructure can be done through better spatial planning, funding adequate staffing in competent authorities, and the early and full involvement of independent experts, citizens, and local authorities.”

G10 and Euronatur suggest the adoption of a differentiated approach to identifying areas for renewable energy development: go-to areas (most suitable ones), second choice areas to be used after space in go-to areas is exhausted, along with clear identification of the no-go areas: strictly protected areas, Natura 2000 sites, other protected areas, reserves, restoration areas, etc.

Consultation of citizens and civil society cannot be waived – otherwise the EU will lose citizen support and undermine trust and key elements for



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democracy. There will be a real risk of losing public support for renewable energy deployment if it comes at the cost of natural areas. Priority in both permitting and financing should be given to community-led projects, which have much higher support and prevent long and expensive court cases.

G10 environmental groups believe that rule of law and existing

environmental legislation remain key and are not an obstacle to progress. The existing environmental legislation must continue to apply – fully and in all areas.

*The **UWEC Work Group** will monitor how this collision unfolds in the EU and will also explore the war's impacts on renewable energy deployment and permitting procedures in other parts of the world. •*



# Green Reconstruction of Ukraine

By [Alexei Ovchinnikov](#)

A landmark event for Ukraine happened in June: the country was granted EU candidate status. Apart from the prospects of European integration, this also indicates a certain degree of responsibility, in particular, following the course of green reconstruction. This is a particularly pertinent issue for the country as it fights back against Russia's military invasion.

Ukraine's path to European integration has been long and challenging. The [Association Agreement](#) was signed back in 2012 and it outlined the main areas of development to be used as indicators for deciding on candidate country status and accession to the EU.

Chapter 6 of the agreement (Articles 360-366) is entirely devoted to environmental issues and defines the ways in which Ukraine and EU countries work together to achieve green development goals. These include participation in various international programmes, such as the Emerald Network and carbon neutrality projects.

Over the past ten years, green recovery projects have been actively pursued in Ukraine, with particular support and financing by [the United Nations](#). The aim of most initiatives has been to create conditions for a green transition, both in the economy and in governance.



Unfortunately, Ukraine's green integration coincided with the outbreak of war in 2014. However, since that time the country has demonstrated both an interest and a willingness to develop environmentally friendly sustainable practices. Ukraine has been particularly active in the field of renewable energy, inclusion of environmental areas in international programmes, and raising the environmental awareness of citizens.

These projects have not always been implemented and developed successfully. Some of them, such as the introduction of a green tariff as part of a renewable energy support programme, faced systemic difficulties. Shadowy, corrupt institutions continued to operate in the country, preventing realization of the transition's full potential.

On the other hand, it has been evident that these changes have a positive affect on society itself. Every year in Ukraine, environmentally oriented initiatives, such as multi-stream waste collection, environmental activism, and civic support for environmental practices (e.g. protecting parks and squares from deforestation) have developed more and more actively. To a large extent, this was due to public associations that actively worked to popularize the green agenda at the community level.

Russia's invasion into new territories in 2022 has led to an escalation of violence and renewed hostilities. [As Oleksiy Vasyliuk noted in an interview](#)

[with the UWEC Work Group Journal](#), today, unlike in 2014-2015, it is urban infrastructure that is the first to suffer significant damage. Moreover, the attacks affect cities across all of Ukraine. How they will be rebuilt using which principles is a serious issue that is currently being discussed both at the national and international levels.

Statements by government officials that Ukraine's recovery will be aligned with the values and standards of the green economy are a positive sign. [Prime Minister Denys Shmygal's statement in May of this year](#) was particularly encouraging. On April 22 the Ukrainian government established [the National Council for the Recovery of Ukraine from the Consequences of War](#).

Greenreconstruction has been declared necessary and important by Ukrainian NGOs in a [joint statement](#). In particular, they outlined seven basic principles that the process should follow:

1. Integration of environmental and climate policy in all sectors
2. Reconstruction to serve the needs of Ukrainians and promote Ukraine's sustainable development
3. Development of the green economy
4. Environmental standards at all levels
5. Adherence to European environmental planning tools for Ukraine's restoration



6. Role of local self-government, transparency, and involvement of the public and communities in decision-making
7. Effective functioning and use of targeted/donor funds for post-war recovery and green economic development

Ukraine's green reconstruction is also being discussed internationally. On 4-5 July, [a conference will be held in Lugano](#), Switzerland on the issue of national reconstruction, and the green agenda will be included as a topic of discussion.

Given that Ukraine is now on the tragic but fast track to European integration, its ambitious plans for carbon neutrality under the Green Deal also depend on how its infrastructure develops.

President of the European Commission Ursula von der Leyen [has already stated](#) that the EU is ready to provide finances and help with projects to rebuild Ukraine. This will be handled by the New European Bauhaus, which the politician called "the heart and soul of the European Green Deal."

[Experts note](#) that green reconstruction will also benefit Ukraine economically. It will bring the country to the forefront in terms of development and adaptation of modern technologies, as well as attract international financial flows. Years of work by non-governmental organizations have also built support for this initiative in civil society, which is already demonstrating its readiness for green transition.

All this leads to the belief that, after a monstrous war, Ukraine will become one of the world's leaders in green development. •



# Civil society on the path to Ukraine's green recovery

*An interview with Maria Dyachuk, specialist, Greening Industry program, Ecoaction Center for Environmental Initiatives.*

The good news is that, despite Russia's ongoing military invasion, Ukraine's recovery is already beginning to be talked about both nationally and internationally. On 4-5 July, the governments of Switzerland and Ukraine will host the [Ukraine Recovery Conference](#) in Lugano, Switzerland, an event to discuss the prospects and directions for the country's recovery. There is a need to ensure that the principles of sustainable development and high environmental standards are included in that restoration process.

We spoke with Maria Dyachuk of Ecoaction Center for Environmental Initiatives (Ecoaction) about how this process is unfolding and who must play a key role in it.

Ecoaction is an NGO whose primary mission is to unite experts and activists for environmental conservation through public influence in decision-making. The organization works to develop environmental awareness in Ukrainian civil society, support renewable energy and energy efficiency projects, and discuss climate change adaptation. The NGO supports a "clean air for all" approach





and works to develop sustainable transportation and agriculture. It is a member of Climate Action Network Europe, CAN EECCA, CEE Bankwatch Network, Coalition on Human Rights in Development, INFORSE Europe, Land Matrix, Transport and Environment, Nuclear Transparency Watch, as well as other international networks and organizations.

**- Maria, tell us about your role in the organization. How is Ecoaction analyzing the environmental impacts of the war in Ukraine today?**

- This is my third year with Ecoaction. In the Greening Industry program, we analyze and propose best sustainable practices, for example, in agriculture and other industries that have negative impacts on air quality and water resources.

After the war began, Ecoaction's work has been divided into three main directions:

First, we gather information about the potential and real negative impacts of Russia's military invasion on the environment. This can include munitions strikes on oil depots, purification plants, and destruction of industrial sites - damage that may have consequences for ecosystems, impact air quality, and affect water and land resources.

We publish the collected information on our website in the form of an [interactive map](#). Our main data sources

include verified news media and official statements issued by the Ukrainian government, for example, regional military administrations or the state environmental inspection agency.

The emphasis is naturally focused on large-scale consequences. It is impossible to collect and present all of the Russian invasion's negative impacts on Ukraine's environment. At present our database contains over three hundred cases of environmental impacts due to the hostilities.

Second, my colleagues in the Energy program are advocating for an embargo on Russian fossil fuels. They are interacting with international news media and organizations about a transition away from fossil fuels within the framework of the ["Stand with Ukraine. End global fossil fuel addiction that feeds Putin's war machine"](#) initiative. We launched [a petition](#) on this topic on 3 June, the 100th day of the war. Our organization is trying to explain why moving away from fossil fuels is not only necessary, but also possible.

Third, we participate in discussions of processes to help Ukraine recover. We aim to ensure that the recovery complies with sustainable development principles and global climate policy. The effort is also interlinked with our renewable energy and energy efficiency programs.

Our goal is to ensure that Ukraine's recovery not only does not harm



the environment, but that it actually contributes to achieving carbon neutrality and favorably influences ecosystem development and biodiversity.

We are working to share ideas about a green and sustainable Ukraine and ways of making the process more transparent in order to enable civil society initiatives and other organizations to participate in them.

**- Can you give other examples of initiatives - organizations that are gathering information about the invasion's negative impact on the environment?**

- There are quite a few initiatives. For example, the Ministry of Environmental Protection and Natural Resources' [Ekozagroza](#) website collects information about environmental crimes. In particular, the site collects data regarding the negative impact of the occupiers' equipment (including air emissions), number of forest fires, and information on air pollution and groundwater.

The Ukraine State Inspectorate's [Crisis Center](#) is also noteworthy. The center works mainly to develop methodologies for collecting and analyzing data on the invasion's negative impacts on the environment. This data can be used in future international litigation.

**- There is a lot of talk now about Ukraine's green recovery. Can you tell us about these processes and how they will be implemented?**

- We are glad that our government has specifically announced a green recovery approach for the country. There is a lot of talk about it today, including about how Ukraine's recovery will align with Europe's Green Deal. We hope that the government will walk the talk.

At Ecoaction, we understand the green recovery as a sustainable process that uses the latest practices and technologies to reduce negative environmental impacts, for example, reducing atmospheric emissions or toxic impacts on water and land resources.

Our position is that our country is moving inexorably towards the European Union, and thus we will also face those same challenges and goals for achieving carbon neutrality. So, we not only can, but we must include that vision in plans for the country's reconstruction. We sincerely believe that Ukraine will choose this path of development - no one wants to return to outdated Soviet methods that had extremely negative impacts on the environment, especially at a time when the issue of adaptation to climate change is so acute.

**- Please talk about green recovery projects and programs under discussion in Ukraine today.**

- [The National Council for the Restoration of Ukraine from the Consequences of the War](#) has already been created at the state level. Programs are being developed under that umbrella



in various arenas – infrastructure, energy, economy, agriculture, and regional development. This is a wide area of work and there are many projects to implement within the framework.

At Ecoaction, we have also developed our own [Principles for Green Post-War Reconstruction](#). These principles are particularly focused on energy development and energy security. We are proposing energy efficiency programs, renewable energy development, and the gradual elimination of nuclear power.

Another direction is the agricultural sector and this directly relates to the food crisis. In our opinion, the solutions must include development of sustainable agriculture practices, prioritizing local food systems, diversifying small and medium-sized agricultural enterprises, and extensive collaboration among agrobusinesses.

We also raise awareness of the need to interlink the recovery with biodiversity conservation and implementation of climate change adaptation projects.

It could be said that our main goal is to integrate the green agenda as deeply as possible into Ukraine's restoration plans. To achieve this, we work in several subgroups and try to present specific projects and proposals.

**- Do you think that we can already start the green recovery process in Ukraine?**

I think that it would be hard to launch any sort of full-scale process at this stage. That said, we can talk about rebuilding buildings and installing windows and new roofs before the end of this year. And that work can happen in accordance with energy efficiency principles and standards.

In the longer term, it is now possible to work on changing laws that will help promote green solutions. So, for example, if we talk about rebuilding industry, we should discuss Law 6004-2 [“On the Prevention and Control of Industrial Pollution.”](#) This is a Euro-integration bill. If adopted, industrial recovery will take place in accordance with the best available technologies and management practices.

I think that we can also discuss and take government action in support of the necessity and significance of a green recovery for Ukraine. Doing so will simplify important and meaningful processes in the future, creating a foundation that can help rebuild the country logically and systematically.

**- Are there any challenges in lobbying for Ukraine's green recovery?**

There are areas that do not align with our philosophy. For example, we are concerned about nuclear power development, a topic often raised when discussing recovery programs today. We also oppose the development of natural gas fields in Ukraine and the expansion of



gas potential; dependence on fossil fuels or nuclear power contradicts sustainable environmental development. Preference should be given to renewable energy sources and the development of energy efficiency programs.

It is also important that discussion of the recovery be open and ensure public participation. Citizens must have opportunities to provide input on Ukraine's restoration plan.

We envision public participation in the process for assessing potential project impacts, for example, that of construction on the environment. Citizens can offer suggestions to minimize environmental risks.

Recently, there has been a lot of talk about the possibility of abandoning the environmental assessment review process. In our opinion, this is an unacceptable move which could catastrophically affect both the environment and the development of civil society in our country.

We are also working to ensure transparency in the process for allocating recovery funds so that communities can connect with it at all levels. It is important that local communities be included as much as possible in the recovery. Their

participation can facilitate the green and sustainable development of Ukraine.

**- What else are environmental organizations doing to ensure that Ukraine's recovery is sustainable and environmentally friendly?**

Together with over 50 other organizations, we have developed a set of [Green Recovery Principles for Ukraine](#). Among these are: transparency of environmental and climate policy in all sectors, Ukraine's restoration serving the needs of its people and contributing to the country's sustainable development, necessity of achieving a green economy, environmental standards at all levels, support for European environmentally friendly planning and restoration tools for Ukraine, involvement of communities (Ukr. hromadi) and the public in decision-making, and effective use of donor funds.

These are all general principles that, in our opinion, should be used in the implementation of all of Ukraine's recovery projects. We will work with other public organizations to study implementation of Ukraine's recovery plan and advance ideas for sustainability and green principles. •