



ANNUAL REPORT

2025



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Annual Report
International Charitable Organization "Environment - People - Law"
2025

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• FOREWORD

The International Charitable Organization "Environment - People - Law" is a gem. Although this gem is rooted in the soil of Ukraine and in the hearts of Ukrainians, its team members have global experience - in their education, networks, and vision.

EPL flies on two wings, each of which is critically important.

On the one hand, EPL provides consultations and conducts litigation to address the most acute strategic long-term environmental protection issues and environmental rights challenges facing Ukraine.

On the other hand, EPL's doors are open to ordinary citizens and local organizations facing environmental problems that directly concern them. The lawyers on EPL's team, as well as its ecologists, analysts, and leadership, are experienced professionals.

The quality of their unwavering work and dedication to duty is second to none. I encourage you to read this annual report to learn more. You will likely be impressed.

John J. Bonine, Professor of Law, Chair of the Board



• LITIGATION PRACTICE: 2025 RESULTS AND OUTLOOK

Throughout 2025, the International Charitable Organization "Environment - People - Law" carried out active litigation in the field of environmental protection.

EPL's lawyers represented the interests of communities, the environment, and society in complex and often principled court disputes. The litigation focused on the lawfulness of decisions made by public authorities, compliance with environmental procedures, the genuine safeguarding of public participation in decision-making, as well as environmental protection under martial law and in the context of the armed aggression of the Russian Federation.

One of the key cases of 2025 was the challenge to the so-called "**waste experiment**" - Resolution of the Cabinet of Ministers of Ukraine No. 1003 dated 30 August 2024, "On the Implementation of an Experimental Project on a Simplified Procedure for Obtaining a Permit to Carry Out Waste Treatment Operations," by which the Government introduced an alternative, simplified procedure for obtaining permits to carry out waste treatment operations.

EPL filed a claim with the Kyiv District Administrative Court, arguing that the Government had in fact altered the legislatively established permitting mechanism by means of a subordinate legal act, including with respect to hazardous waste, which directly contradicts the Law of Ukraine "On Waste Management."

Proceedings in this case were opened in 2025, preparatory hearings were held, and the dispute itself acquired systemic significance, as it concerns the limits of the powers of executive authorities and guarantees of environmental safety in the field of waste management.

An important place in EPL's litigation practice in 2025 was occupied by cases related to **challenges against urban planning documentation**.

In particular, in Lviv Oblast, EPL, together with residents of the city of Vynnyky, is challenging the decision of the Lviv City Council approving a detailed territory plan that provides for the development of the Emily Resort recreational complex around Vynnyky Lake.

The detailed territory plan (hereinafter, the DTP) covers an area of 118.8 hectares and provides for the placement of a hotel and wellness complex with commercial premises, an underground parking facility with tennis courts, as well as, in the future, social infrastructure facilities.

The northern part of the planned area borders the Vynnyky Forest, and the approved DTP effectively permits the future change of the designated use of certain land plots from forestry land to recreational land, which contradicts the requirements of land and forest legislation.

The court dispute focuses, in particular, on violations of the public consultation and strategic environmental assessment procedures, the inconsistency of the DTP with the Master Plan, as well as the absence of a proper assessment of the impact of the planned decisions on forest plots, including the failure to determine the scope of possible logging and the failure to survey the area for the presence of rare species of flora and fauna.

In 2025, the court of first instance appointed a forensic construction and technical examination in the case and suspended the proceedings until its results were obtained.

This court dispute extends far beyond the challenge to a single urban planning decision and in fact concerns the broader model for planning and development of mountain areas in the Carpathians.

EPL maintained that the approval of the DTP had taken place with substantial violations of the requirements of urban planning and environmental legislation, in particular the Law of Ukraine "On the Regulation of Urban Development Activities," the Procedure for Conducting Public Hearings, the Forest Code of Ukraine, as well as Ukraine's international obligations under the Carpathian Convention and the Bern Convention. The DTP project was not properly disclosed to the public, the public hearings were merely formal in nature, and the environmental consequences of the large-scale intervention in the mountain landscape - including road construction, the arrangement of technical sites, and threats to virgin forests and forest ecosystems - did not receive proper legal assessment.

In 2025, the consideration of the case took place under difficult procedural conditions. The proceedings were suspended twice for the purpose of conducting a forensic land-technical examination, which effectively created the conditions for the implementation of the disputed DTP to begin.

During this period, preparatory and construction works were recorded on the mountain pasture area, including the construction of foundations for wind turbines, without the completion of environmental impact assessment procedures and without obtaining the proper permit documentation, as well as large-scale logging of virgin forests for the construction of a road to the planned wind power plant site.

In August 2025, the court of first instance dismissed the claim.

The court of appeal, while upholding that decision, focused primarily on general considerations regarding the desirability of developing renewable energy and ensuring energy security under wartime conditions, effectively pushing into the background the issues of compliance with mandatory territorial planning procedures and environmental restrictions.

The environmental dimension of the dispute was reduced to formal violations which, in the court's view, did not affect the outcome of the adoption of the disputed decision.

At the end of 2025, EPL filed a cassation appeal with the Supreme Court.

Alongside the cases related to challenges against urban planning decisions of local self-government bodies, a significant part of EPL's litigation practice in 2025 consisted of disputes arising in connection with the activities of private enterprises and the direct impact of such activities on people's living conditions and on the state of the environment.



An important example is the **case concerning the activities of the pig farm operated by AIE Hriada LLC** in the village of Hriada, Lviv District.



For many years, the pig farm has created considerable environmental and sanitary pressure on nearby settlements. Residents have systematically complained of a strong stench, contamination of soil and water bodies, and the inability to make full use of their homes and household plots. State supervisory authorities have repeatedly recorded exceedances of air and water pollution standards.

The key subject of the court dispute is the lawfulness of the state sanitary and epidemiological examination opinion, by which the sanitary protection zone of the pig farm was reduced in 2022 from the standard 500 meters to 250 meters, despite changes in production capacity and the absence of an environmental impact assessment.

In 2024, the Eighth Administrative Court of Appeal delivered a fundamentally important judgment, declaring the disputed sanitary and epidemiological examination opinion unlawful and annulling it, thereby upholding the environmental rights of the residents. This judgment became a major milestone in the long-standing struggle of the community of the village of Hriada for the right to a safe environment. At the same time, the Supreme Court set aside the judgment of the appellate court and remitted the case for a new hearing before the court of first instance.

The basis for that decision was that the courts of the previous instances had failed to involve in the proceedings all persons residing within the sanitary protection zone of the pig farm, despite the obvious impact of the disputed decision on their rights and interests.

As of 2025, the case is under renewed consideration before the court of first instance. Its further course is important not only for the residents of the village of Hriada, but also for shaping judicial practice regarding the mandatory consideration of the interests of all affected persons in environmental disputes.

An important element of EPL's litigation practice in 2025 was **the case concerning the activities of Polikolor LLC in the city of Kamianske**, which during the reporting year moved to the cassation review stage before the Supreme Court.

The essence of the dispute lies in protecting the right of a resident of a residential area to an environment safe for life and health in connection with the placement of the production facilities of a paints and varnishes manufacturer in the immediate vicinity of a residential building.

The claims sought the suspension of the production activity on the grounds that it created a constant adverse impact on living conditions.

In 2024-2025, the courts of first instance and appeal dismissed the claim.

At the same time, on 16 July 2025, the Supreme Court opened cassation proceedings based on the claimant's cassation appeal filed with EPL's legal support.

The cassation review of this case is important for shaping judicial approaches to the protection of the constitutional right to a safe environment in disputes between residents and industrial enterprises located within residential areas. Consideration of the case will continue in 2026.

A significant positive result of EPL's litigation work in 2025 was the victory of the residents of the village of Lany in the Bibrka territorial community in **the case against Agro-Tradytsii Farming Enterprise** concerning the unlawful reduction of the sanitary protection zone of a planned poultry farm.

The subject matter of the dispute was the state sanitary and epidemiological examination opinion by which the sanitary protection zone of a poultry farm with a capacity of up to 1 million broiler chickens per year was reduced from the standard 300 meters to 152 meters, which effectively allowed the facility to be designed in the immediate vicinity of residential buildings.

On 4 January 2025, the Eighth Administrative Court of Appeal upheld the decision of the court of first instance, which had declared the disputed opinion unlawful and annulled it. The appeals filed by the enterprise and the supervisory authority were dismissed.

Soon thereafter, the Supreme Court refused to open cassation proceedings.

Thus, in 2025, the case ended with a final court victory for the community, with legal support from the EPL and Agro-Tradytsii Farming Enterprise lost the legal grounds for designing and implementing the poultry farm near the residential area.



In 2025, EPL also **represented the interests of the Dykanskyi Regional Landscape Park in a court dispute with the State Enterprise "Forests of Ukraine"** concerning the proper maintenance and management of the territory of the "Lilac Grove."

After the proceedings in the case were closed, EPL's lawyers provided legal support in the post-judgment settlement phase, focusing on practical mechanisms for preserving valuable plantations.

A separate and fundamentally important area of EPL's litigation work in 2025 concerned **compensation for environmental damage caused by the armed aggression of the Russian Federation.**

Illustrative in this context is the case seeking to recover nearly UAH 5 billion in damages from the Russian Federation for the harm caused to the territory of the Kamianska Sich National Nature Park in Kherson Oblast.

The claim was filed by EPL in the interests of the Ukrainian people on the basis of commission inspection reports, calculations of the State Environmental Inspectorate, and the Methodology for Determining Damage Caused to Nature Reserve Fund Sites as a Result of Armed Aggression.

The courts of first instance and appeal left the claim without consideration, taking the position that an NGO is not vested with the right to bring such claims in the interests of the state.

In 2025, the Supreme Court, sitting as the Commercial Cassation Court, upheld those decisions, not supporting EPL's arguments concerning the right of NGOs to act in the public interest in cases involving environmental damage. Despite the negative outcome, this case is of exceptional importance for shaping approaches to the environmental liability of the aggressor state and the role of civil society in restoring justice, while the legal positions advanced in the proceedings remain important for future national and international mechanisms for compensation for environmental damage.

EPL's litigation activities in 2025 were aimed not only at achieving individual procedural results, but above all at shaping consistent and substantive judicial practice in the field of environmental protection.

Through strategic litigation and participation in complex disputes, EPL brought before the courts the consideration of fundamental issues concerning the mandatory nature of environmental procedures, the limits of the discretion of public authorities, the standards for taking community interests into account, and the role of public organizations in protecting public environmental interests. Even in cases with an unfavorable outcome, EPL's legal positions outlined an alternative, environmentally oriented approach to the interpretation of legislation and laid the groundwork for a future reconsideration of judicial approaches.

A significant number of key cases will continue into 2026, creating potential for further influence on the case law of the Supreme Court and for participation in building high standards of judicial protection of the environment in Ukraine.



• ENVIRONMENTAL ANALYTICS

The year 2025 was highly productive in terms of the number and diversity of analytical and informational products developed by EPL's experts.

As usual, EPL monitored progress in advancing European integration reforms in the environmental sphere, analyzing, explaining, and promoting among a broad audience developments and decisions involving Ukraine and the EU.

A Vision for Ukraine's Environmental Policy was prepared - an analytical document intended to support reforms in the field of environmental governance. It highlighted the main problems in environmental governance in Ukraine, the sector's key gaps, and the principal solutions for overcoming them and for achieving the goal of establishing a democratic system of environmental governance to preserve the environment and natural resources for future generations.

A document entitled Ukraine's European Integration Progress in 2024 in the Environmental Sphere: Climate Change was also prepared.

Ahead of the Fourth International Ukraine Recovery Conference in Rome, EPL, together with other representatives of the environmental community, prepared a Position Paper on the State of Progress in Environmental Reforms, which addressed both achievements and shortcomings in environmental protection reforms related to European integration.

At the end of the year, we also prepared a Review of the Environmental Component of the European Commission's Annual Enlargement Report (Ukraine, 2025).

A tremendous amount of work was carried out in the area of approximation to EU legislation in the field of biodiversity conservation.

In particular, the policy brief The Destruction of Ukraine's Biodiversity was prepared, as well as the in-depth analytical paper named Reform of the System of Conservation and Restoration of Natural Habitats and of Wild Fauna and Flora: Ukraine on the Way to the EU. Based on this work, a whole series of draft laws and secondary legislation were developed, aimed at implementing in Ukraine the requirements of the Habitats Directive and the Birds Directive.



Візія екологічної політики України

Аналітичний документ



Історичний крок Офісу прокурора МКС: Екологічна шкода стає центральним питанням міжнародного кримінального права



Знищення біорізноманіття України

Полісі бріф

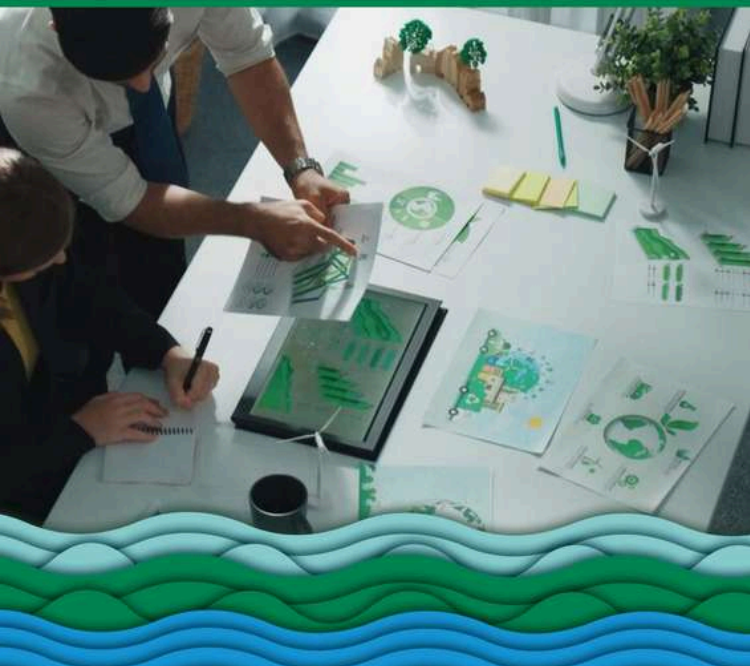


This included, in line with the updated realities of Ukraine's accelerated European integration track, the development of a new draft law on conservation areas (the Ukrainian sector of the Natura 2000 network).

ПОЗИЦІЯ

ПРЕДСТАВНИКІВ ЕКОЛОГІЧНОГО РУХУ УКРАЇНИ
ЩОДО СТАНУ СПРАВ ІЗ ПРОСУВАННЯМ ДОВКІЛЄВИХ
РЕФОРМ ДО ЧЕТВЕРТОЇ КОНФЕРЕНЦІЇ З ПИТАНЬ
ВІДНОВЛЕННЯ УКРАЇНИ

2025, Рим



In support of the rollout of the industrial emissions reform, a Popular Commentary to the Law of Ukraine "On Integrated Prevention and Control of Industrial Pollution" was prepared. This law introduced in Ukraine an integrated approach to the regulation of industrial emissions based on best available techniques and management methods. Recalling readers' gratitude for the Popular Commentary to the Law of Ukraine "On Environmental Impact Assessment" that we had published earlier, we decided to repeat the experience of explaining the provisions of a complex new law in accessible language.

Together with the Czech organization Arnika, EPL's experts prepared the Shadow Report Successes and Challenges in Upholding Aarhus Principles in Times of War: Civil Society Report on the Implementation of the Aarhus Convention in Ukraine in 2021-2024". In addition, for the regular Meeting of the Parties to the Convention in November 2025, EPL prepared a document examining the implementation by the Government of Ukraine of decision VII/8r of the Meeting of the Parties to the Aarhus Convention concerning Ukraine's non-compliance with its obligations in the context of production sharing agreements.

The document Towards Transparency and Public Participation in the Decision-Making Process on Subsoil Use under Production Sharing Agreements reviews the situation that led to consideration of the issue at the international level, provides a brief summary of the findings and recommendations of the Convention bodies, analyzes Ukraine's progress in implementing them, and offers proposals for further steps to return Ukraine to a state of compliance with the Convention.

Also in 2025, the publication Application of the European Convention on Human Rights for Protection of Environmental Rights and the Environment (in Ukrainian and English) appeared in print. It is already the second analytical review of the case law of the European Court of Human Rights in environment-related cases prepared and published by EPL.

EPL's experts also conducted in-depth research in the field of hazardous waste management. Unfortunately, even after the launch of the new permitting system in this area and the issuance of more than 30 new licenses, there are still glaring cases of improper hazardous waste management. This issue is addressed in the following materials: The Legal Regime of Licensing for Hazardous Waste Management: Limits of Permissible Activities of the Small Private Enterprise Rada, Analysis of Hazardous Waste Management Licensing: Focus on Tarkom Ecoservice LLC, Debriefing: The Activities of the License Holder A-ENERGO LLC, and others.

EPL's experts also did not overlook the disgraceful experiment aimed at simplifying the permitting system, which they examined in detail in the paper On the Unlawfulness of Resolution No. 1003 of the Cabinet of Ministers of Ukraine of 30 August 2024 "On the Implementation of an Experimental Project on a Simplified Procedure for Obtaining a Permit to Carry Out Waste Treatment Operations."

Based on this research, EPL filed a claim with the Kyiv City Administrative Court seeking to have the unlawful resolution and the experiment annulled.

EPL's experts also closely followed the development of instruments for holding the aggressor accountable for environmental damage, including ecocide committed on the territory of Ukraine.

The book Kamianska Sich National Nature Park: The War Against Nature was published, highlighting the impact of military actions on the nature of the national park, including the impact of the destruction of the Kakhovka Hydroelectric Power Plant on its biotopes, as well as such analytical and informational documents as: Europe One Step Closer to the Criminalization of Ecocide, A Landmark Step by the ICC Prosecutor's Office: Environmental Damage Becomes a Central Issue of International Criminal Law, and The Problem of Ecocide Through the Lens of the Russian Invasion of Ukraine: Legal Dimension.

Work was carried out systematically to prepare short news items on the criminalization of ecocide in foreign countries and on initiatives to criminalize ecocide at the international level.

EPL also wrote extensively about noteworthy environmental decisions of foreign and international courts.

An important topic on which EPL works systematically is the institutional dimension of environmental policy.

In 2025, EPL worked on a comprehensive analytical document on the institutional capacity of the state in terms of shaping and implementing environmental policy – a paper named Institutional Capacity in the Field of Environmental Protection: Assessment, Challenges, and Prospects.

This work will be completed and the document published in 2026. In the meantime, the following document is available on EPL's website: Environmental Governance at the Oblast Military Administration Level: What the Institutional Analysis Shows.





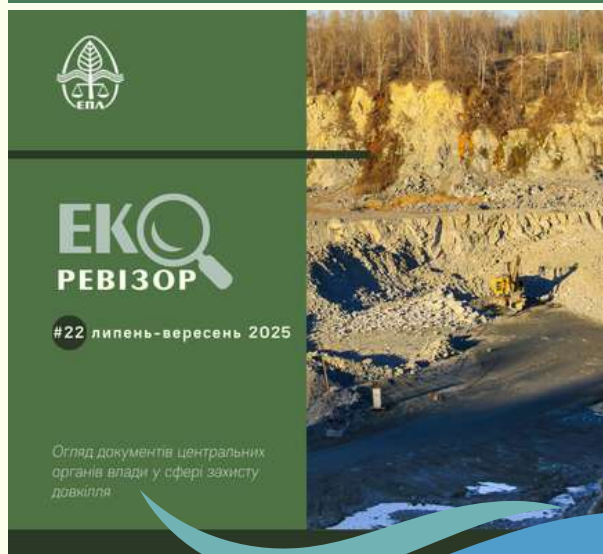
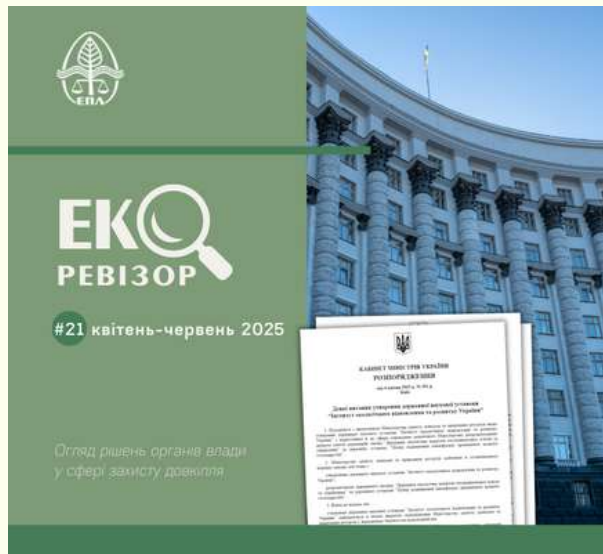
• ECO-AUDITOR

Throughout the year, as part of preparing the Eco-Auditor, **71 documents** were analyzed - draft resolutions of the Cabinet of Ministers of Ukraine, draft laws, and other normative acts that in one way or another intersect with environmental protection issues and shape state policy in this field.

Of these, 48 acts received a positive assessment ("approved"), which indicates that most initiatives correspond to current environmental challenges and contribute to improving the situation in the environmental sphere.

A conclusion of "approved with reservations (comments)" was given to 10 documents. These failed to take into account certain specific features of environmental protection or public participation in these processes, although overall they were positive in substance.

At the same time, 13 documents received the assessment "not approved." They were found not to comply with sustainable development goals or to contradict the principles of environmental safety.





- **SUPREME COURT CASE LAW IN THE FIELD OF ENVIRONMENTAL LAW IN 2024-2025**

This review is intended to summarize the key legal positions of the Supreme Court, identify trends in the development of case law, and determine their significance for the further application of environmental law.

Analysis of Supreme Court judgements for 2024-2025 demonstrates the Court's systematic approach to ensuring environmental protection, compliance with environmental legislation, and the balancing of the interests of citizens, the state, and businesses. Judicial practice confirms the priority of environmental interests over commercial interests and emphasizes the importance of environmental impact assessment procedures. During this period, EPL focused on Supreme Court decisions in the following key areas: the lawfulness of actions by state supervision and control bodies, the conduct of environmental impact assessment procedures, liability for violations of environmental legislation, protection of citizens' environmental rights, and the protection of forests and land resources.

The Supreme Court confirms the lawfulness of the actions of state supervision and control bodies, even where procedural violations are identified during inspections, for example, exceeding the time limits for conducting an inspection. At the same time, the Court emphasized that citizens' complaints constitute a proper basis for initiating inspections and issuing compliance orders, which underscores the importance of public participation in monitoring compliance with environmental legislation. The courts consistently emphasize the mandatory nature of environmental impact assessment procedures for planned activities, including the reconstruction of enterprises. The absence of an EIA conclusion may serve as grounds for restricting the implementation of projects or the activities of operating enterprises, even if the economic activity of such enterprises began before the relevant law entered into force.

The Supreme Court considered a number of cases involving violations of environmental legislation. Illegal logging, illegal harvesting of aquatic biological resources, or excess emissions of pollutants entail criminal and/or civil liability. In doing so, the Supreme Court stressed the need for proper documentary proof of the circumstances and correct calculation of the damage caused, which is key in claims for compensation.

The Supreme Court formulated conclusions on the need to maintain a balance between citizens' environmental rights, the rights of enterprises, and environmental requirements. The Court confirmed citizens' right to judicial protection of environmental rights, taking into account international standards, in particular Article 9 of the Aarhus Convention.

With regard to the protection of environmental rights, the Supreme Court confirmed the right of individuals and representatives of the public to apply to the administrative courts to protect their interests. It also upheld the right of prosecutors to represent the interests of the state in cases where supervisory bodies fail to perform their duties, in cases related to environmental protection.

In the field of forest resource protection, the Supreme Court and appellate courts confirmed the duty of state authorities and local communities to protect forests, even where the specific persons responsible for forest damage have not been identified. The Court emphasized the responsibility of local self-government bodies for proper control and protection of natural resources within their territory.

The Supreme Court also reaffirmed the principle of proportionality in state interference with business activities concerning the suspension of permits for emissions of pollutants, recognizing such interference as justified provided it pursues a lawful aim, namely the prevention of environmental harm.

In considering issues of environmental control, the courts confirmed the priority of environmental protection in the construction of facilities that may cause environmental damage, in particular in the construction of small hydropower plants.

Thus, the Supreme Court's case law in 2024-2025 demonstrated a systematic and consistent approach to environmental protection and the sustainable use of natural resources.

The main benchmarks of this case law include strengthening oversight of the legality of decisions by state supervision and control bodies, confirming the right of the public and prosecutors to judicial protection of environmental rights and interests, observing the principle of the priority of environmental interests over commercial interests, confirming the liability of local self-government bodies and enterprises for environmental damage, as well as applying the principle of proportionality in state interference in economic activity in order to prevent environmental harm.

Thus, overall, the case law of the Supreme Court has established clear guidance for public authorities, enterprises, and the public regarding compliance with environmental legislation and the achievement of sustainable development.



• VOLUNTEER ACTIVITIES

In 2025, EPL continued to develop its volunteer programme. The organization brought together students of natural sciences, biologists, ecologists, lawyers, specialists in other fields, and concerned citizens, each of whom worked under the direct supervision of EPL staff.

Such cooperation enabled volunteers to learn how to work with official documents and the legislative framework, carry out analytical work, and apply scientific knowledge in practice.

The Eco-Volunteer Programme. At the beginning of 2025, EPL launched the Eco-Volunteer programme, in which 7 participants were involved. Every week, coordination meetings were organized for programme participants, within the framework of which training and practical tasks were planned.

In addition, participants also had the opportunity to attend the training course Tools for Environmental Conservation and Restoration During Reconstruction, as well as to take part in sessions on the topics Tools of Citizens' Influence on Environmental Policy and Practical Aspects of Writing Requests and Appeals.

Volunteers also had the opportunity to join EPL's summer school Tools for Environmental Conservation During War, European Integration, and Green Reconstruction."

Thus, volunteers were given the opportunity not only to implement their ideas in the field of environmental conservation, but also to acquire new skills in drafting appeals, cooperating with executive authorities and communities, using geographic information system technologies, data from state registers, and so on, as well as to gain experience working with EPL's leading ecologists and lawyers on protecting the environment through legal instruments.



The efforts of volunteers within the programme were integrated into the organization's areas of work, in particular:

- research and protection of small and medium-sized rivers in northern and central Ukraine, including analysis of environmental restrictions on development in the floodplain of the Irpin River;
- combating illegal logging in high mountain areas;
- studying the issue of fuel oil pollution in the Black Sea as a result of accidents involving Russian tankers;
- preparing materials for a petition for the creation of the NRF object "Sukhovolske Eye."



Protection of the Svydovets mountain range, Mount Hostra, and the Runa mountain meadow. The main focus of the activities was the protection of the high mountain ranges of Zakarpattia, in particular Svydovets, Mount Hostra, and the Runa mountain meadow. During March and April, field visits were made together with volunteers, during which the construction of a new forest road to the Runa mountain meadow through Mount Hostra from the village of Zbyny was documented, as well as the threat of destruction of a rare population of the common snowdrop. Following these visits, official requests and justifications for the creation of a protected zone were prepared and submitted to the Zakarpattia Oblast State Administration. Special attention was paid to counteracting illegal logging in virgin forests and to analyzing the risks posed by the construction of wind power plants, which destroy the integrity of wilderness areas.



The central event of the year was the second summer volunteer school, Conservation of Relict and Endangered Species of Plants and Animals of Svydovets, held for the second time jointly with Kherson State University on 9-13 June 2025. The purpose of the event was the conservation and study of the valuable natural ecosystems of the Svydovets mountain range in the Ukrainian Carpathians (Rakhiv District, Zakarpattia Oblast), which is under threat of destruction for the purpose of building a ski resort and wind power plants on its site. The main task of the summer school was to identify the locations where rare relict and endemic plant species grow.

Thirty-two participants, including EPL volunteers as well as students of Kherson State University and Uzhhorod National University, covered more than 60 kilometres across the mountain range, making 7,387 scientific observations of 386 species using the international iNaturalist platform.

The involvement of volunteers and students within the framework of Citizen Science ensured a high level of representativeness of the observation sample, which is critically important for verifying scientific conclusions.



During the school, anthropogenic impacts on the ecosystems of Svydovets were also studied, including the already existing problems of jeep tours and "mountain tourism on wheels"; the commercial harvesting of lichen known as "Iceland moss," as a result of which its habitats are being ruthlessly destroyed; and erosion caused by cars and motorcycles driving along the slopes of the mountain ridge. Svydovets is still threatened by the construction of a ski resort, and for 8 years there has been an ongoing struggle with certain representatives of the forestry and resort business, who have a completely different vision for this territory.

To the threat of the construction of a ski resort was added the threat of the construction of wind power plants. On Mount Troiaska, a mast was erected to measure wind speed - the first step toward the construction of wind power plants.

In order to oppose the planned construction of wind power plants on the Svydovets mountain range, additional field studies were conducted in July by EPL staff and volunteers, which made it possible to collect primary data directly in the zones of future technogenic impact.

These field visits, as well as the results of the summer school, formed an evidentiary basis regarding the current environmental condition of the territories of the mountain range that are potential sites of industrial development.

The combination of the summer school data and the July field visit resulted in the preparation of 11 scientific justifications for the establishment of protected zones for the conservation of rare and endangered species.

Their establishment is an effective instrument for preserving biodiversity and preventing the degradation of the highland soil cover. Granting protected status to the identified rare species makes it possible to minimize the risks posed by industrial construction and uncontrolled recreation, while ensuring the stability of ecosystem services.

Thus, the integration of scientific research into the advocacy process enables EPL to counter the development of mountain ridges by ski resorts and the irrational installation of wind power plants.

We consistently demonstrate that green energy cannot be developed at the cost of destroying the last bastions of wilderness, and that the preservation of highlands is a natural safeguard against flooding and soil erosion in the Carpathians.

Promoting the ideas of protection and the creation of protected zones for marmots in Sumy Oblast. Volunteer activity was also aimed at protecting vulnerable ecosystems in lowland areas. An important case was the protection of marmot habitats in Sumy Oblast.

Thanks to the work of EPL volunteer Larysa Osypenko, with whom cooperation has continued since 2023, an appeal was prepared regarding the inadmissibility of ploughing lands where the burrows of these animals have been preserved.

Since the marmot is an indicator species of the health of steppe ecosystems, its conservation helps maintain soil fertility and the integrity of natural landscapes that suffer from excessive agricultural pressure. In addition, she also conducted an educational meeting with students in grades 7-10 of Romny General Education School of I-III Grades No. 11, which helps foster in children an understanding of their own natural heritage.

Legal Focus. At the end of 2025, in partnership with the academic community, EPL launched an internship programme for third-year students of the Institute of Law, Psychology and Innovative Education of Lviv Polytechnic National University. Under the direct supervision of EPL's practicing lawyers, the student interns were integrated into real human rights protection processes, where they were involved in the detailed analysis of case materials concerning violations of environmental legislation.

EPL's lawyers also periodically deliver lectures to law students at various higher education institutions in Ukraine, including online, where they share their experience of protecting the environment through legal methods and explain the specific features of the work of attorneys and lawyers in cases concerning the protection of nature and citizens' environmental rights.



• LEGAL CONSULTATIONS

In 2025, EPL's lawyers and ecologists provided consultations to 44 clients. Most of them were residents of communities defending their right to a safe environment. Consultations were also provided to colleagues from other environmental organizations, representatives of national nature parks and other NRF objects, journalists, and local self-government bodies. **In total, 182 oral and written consultations were provided in 2025.**

The issues raised with EPL covered various components of the environment: air emissions and the right to clean air, authorized and unauthorized discharges and the right to clean drinking water, land-related issues, compliance with sanitary protection zones, waste management, the functioning of nature reserve fund sites, extraction of mineral resources, the use of pesticides, tree felling in forests and parks, and so forth.

A considerable number of consultations were related to explaining the environmental impact assessment procedure and assisting in the analysis of EIA reports and participation in public consultations. In particular, EPL representatives, together with residents of the community of the village of Zhykhor near Kharkiv, took part in public hearings on the EIA report of Osnova Quarry LLC (TOV "Karyer Osnova"). The EIA report submitted in 2025 was a repeated attempt to legalize the expansion of activities onto new forest plots located in the immediate vicinity of the lake. The territory where the quarry expansion was planned covered the coastal area of Lake Osnovianske, one of the favourite recreation spots of Kharkiv residents. The lake and the adjacent forest have recreational and health-related value, provide a microclimate, and serve as a natural barrier against dust and noise. The destruction of this territory caused justified concern among the community, which actively opposed interference with this valuable ecosystem.

During the public hearings, EPL representatives submitted comments on the report, which violated the requirements of the current legislation and contained false and incomplete information. As a result, by its Order of 09 May 2025, the Ministry of Environmental Protection and Natural Resources refused to issue Osnova Quarry LLC an EIA conclusion for the planned activity, namely sand extraction. It is worth noting that in this case the Ministry recorded the highest number of participants in public hearings since such hearings were introduced under the Law of Ukraine "On Environmental Impact Assessment" - approximately 600 persons participated in the public hearings simultaneously.



Another consultation within the framework of environmental impact assessment that had a positive outcome for EPL's clients concerned Titan Ecoservice LLC and the issuance of an environmental impact assessment conclusion for the treatment of hazardous waste in the village of Novi Petrivtsi in Kyiv Oblast. In this case, EPL helped local residents defend their right to a safe environment by preparing comments on the EIA Report as part of its public consultation procedure. According to the EIA materials, the enterprise planned to process used lubricants, such as gasoline and diesel engine oils, which belong to the category of hazardous waste of the second toxicity category.

At the same time, the Report provided incomplete information about the actual situation at the site of the planned activity, in particular the distance to residential buildings; it did not substantiate the size of the sanitary protection zone; it failed to properly consider alternatives to the planned activity; and it contained a number of other violations. As a result, the Ministry still refused to issue the enterprise a positive EIA conclusion for its planned activity. The relevant order, with the justification of the reasons for refusal, was published on the website of the Unified Environmental Impact Assessment Register on 07 May 2025 (case registration number 9930).

EPL specialists also helped residents of the Radomyshl community in Zhytomyr Oblast analyze two EIA Reports concerning the planned activity of Dolomite LLC: "Development and Technical Reclamation of the Nehrebivske Dolomite Deposit (Phase I - Southern Section), Located in Zhytomyr District, Zhytomyr Oblast of Ukraine (Radomyshl Urban Territorial Community)." The deposit is located in the floodplain of the Bilka River, a right tributary of the Teteriv River. The dolomites were first explored back in 1964 during geological survey works.

Detailed exploration was carried out in 1983-1986.

It should be noted that the assessment of the impact on the aquatic environment in the EIA Report is based on obsolete materials from the late 1960s and early 1980s. No new studies were conducted, and the data were not updated.

The Report does not examine how the hydrochemical water quality indicator in the Bilka River will change as a result of pumping water out of the flooded quarry during preparatory works and pumping quarry water during the planned activity, nor how such a change will affect the aquatic environment of the Bilka River.

The impact of the planned activity on the health of local residents, in particular on the quantity and quality of drinking water for the population's needs, was not assessed. EPL submitted its comments on the Report.

On 4 February 2025, the Ministry of Environmental Protection and Natural Resources published in the Unified Environmental Impact Assessment Register an order refusing to issue an environmental impact assessment conclusion.



However, the company reapplied for an EIA, and on 8 September 2025 the Ministry published in the Unified Environmental Impact Assessment Register the Conclusion on the planned activity "Development and Technical Reclamation of the Nehrebivske Dolomite Deposit in Zhytomyr District, Zhytomyr Oblast (Phase I)," by which it found acceptable the plans of Dolomite LLC for the extraction of mineral resources - dolomites - in the Radomyshl Urban Territorial Community near the village of Nehrebivka (Southern section of the deposit).

Despite the fact that the planned activity was found acceptable, the Ministry established 149 environmental conditions for such activity, of which 30 concern water, 20 concern air protection, another 8 concern the minimization of noise and vibration, and 6 concern landslides, the stability of quarry sides and dump slopes, and the prevention and reduction of dangerous geological processes and phenomena. This conclusion is perhaps record-breaking in the number of environmental requirements it sets, most of which concern the control and monitoring of the planned activity. Such a number of environmental requirements, including requirements for control and monitoring, may indicate the Ministry's uncertainty regarding the environmental safety of the planned activity for which the EIA Conclusion was issued. Local residents did not agree with the lawfulness and soundness of the conclusion and challenged it in court.

As we sometimes say within the organization, EPL's main client is the environment. Accordingly, some of the cases handled by EPL's lawyers do not have a conventional client, but are initiated by the organization in the public interest. One such case concerns the protection of the Granite-Steppe Lands of Buh Regional Landscape Park. In April 2025, Head of EPL's Legal Department Olha Melen-Zabramna took part in public hearings within the EIA procedure regarding the planned activity of raising the water level of the Oleksandrivske Reservoir on the Southern Buh River to 16.9 m at NRL.

The said planned activity threatens the water level of the Southern Buh River and would destroy a nature reserve fund site and a site of the Emerald Network. As a result of the analysis of the EIA report, comments were prepared and submitted to the Ministry of Environmental Protection and Natural Resources.

As a consequence of the review of the EIA report and its public consultation, the Ministry decided in May 2025 to refuse to issue an EIA Conclusion.

This is another victory in this case, since EPL has been protecting the valuable protected areas of Mykolaiv Oblast since 2006 and has been taking legal steps to stop such unlawful plans of NNEGC Energoatom.

EPL also actively supported the protection of nature reserve fund sites outside the framework of the environmental impact assessment procedure.

In particular, EPL's lawyers advised a resident of the village of Vyhnanka in Vinnytsia Oblast on preventing the construction of a small hydropower plant within the territory of the Nemyrivske Pobuzhzhia Regional Landscape Park.

In this case, there had already been a court judgement following a claim by the Tulchyn District Prosecutor's Office stating that the boundaries of the Nemyrivske Pobuzhzhia Regional Landscape Park must be demarcated on the ground. However, in this case the local self-government bodies had for almost a year failed to comply with that court decision.

During the consultation, a number of appeals were prepared and submitted, which made it possible to draw the attention of the supervisory authorities, the State Environmental Inspectorate, and the State Enforcement Service to the need to ensure enforcement of the court judgement and the on-the-ground demarcation of the park boundaries, as well as to strengthen the community's position in protecting the nature conservation area of the Nemyrivske Pobuzhzhia Regional Landscape Park.



It is expected that compulsory enforcement of the court judgement will make it possible to prevent development of the territory of the regional landscape park, including the construction of a hydropower plant. As a result, fines were imposed on authorized officials of local self-government bodies for committing an administrative offence by failing to comply with a court judgement, and a working group was also established under the local council on the issue of on-the-ground demarcation of the boundaries of the Nemyrivske Pobuzhzhia Regional Landscape Park.

Another regional landscape park to which EPL provided legal assistance is the Dykanskyi Regional Landscape Park in Poltava Oblast. Within the park there is a lilac grove, which is under the use of the State Enterprise Forests of Ukraine. Neither the enterprise nor the regional landscape park maintains the grove, which leads to its decline. For this reason, the Poltava Oblast Military Administration issues an annual reprimand to the park administration, although legally the duty to maintain it lies with the State Enterprise.

In order to resolve this situation, the management of the regional landscape park issued an order obliging the State Enterprise Forests of Ukraine to maintain the lilac grove. However, the latter challenged such order in court. Therefore, the park management sought legal assistance from EPL.

As a result, the relevant documents were analyzed, a joint online meeting was organized with the management of the Dykanskyi Regional Landscape Park to discuss the problematic situation, and support was also provided in preparing an order to revoke the challenged order, since its effectiveness was assessed as extremely low, while court proceedings would have had a negative impact on the image and activities of the Dykanskyi Regional Landscape Park and would have required financial and time expenditures.

Finally, it was possible to avoid protracted litigation aimed at preserving an ineffective order of the Dykanskyi Regional Landscape Park.

EPL also helps protect other nature reserve fund sites. In particular, EPL's cooperation with the NGO Veteran UA is ongoing, within the framework of which EPL provides consultations on terminating the operation of a rope park on the territory of Holosiivskyi National Nature Park, in order to preserve the M. Rytskyi Natural Monument.

Traditionally, throughout 2025, EPL was approached by residents complaining about living in the vicinity of livestock farms.

Thus, EPL's lawyers advised residents of the villages of Dychky and Pidhoroddia in Ivano-Frankivsk Oblast, who are concerned about the environmental situation that has developed in their community after the pig complex of Goodvalley Ukraine LLC began operating in these villages in 2022.

According to the residents, the stench and noise coming from the pig farm make not only living in the village impossible, but even temporary stays there. The unpleasant smell in the air is so pungent that it is impossible to dry clothes outdoors or ventilate rooms. In addition, the squealing of pigs and the noise of equipment are constantly heard.

The standard sanitary protection zone between the pig complex and the nearest residential development is not maintained.

EPL's lawyers helped the residents prepare complaints to the supervisory authorities, in particular to the State Environmental Inspectorate of Ukraine and the State Service of Ukraine on Food Safety and Consumer Protection. However, these authorities refused to conduct an inspection, citing martial law and changes in legislation. Therefore, the residents' struggle against the pig farms continues. EPL, for its part, continues to provide them with legal assistance in defending their right to a clean environment.

EPL was also approached by representatives of the NGO Eco Hromady, who are fighting against an illegal farm located within a residential area in the village of Baryshivka, Kyiv Oblast.

In fact, a family of local residents set up a mini-farm with 25 cows right in their backyard in a residential neighbourhood. The residents living nearby did not accept such neighbours and turned to EPL for legal assistance.



As a result of the measures taken, violations of sanitary and veterinary legislation by the “farm owners” were documented, a fine was imposed, a veterinary inspection, vaccination, and registration of the cattle being kept were carried out, the “owner” was registered as an individual entrepreneur (FOP), and the farm’s activities were brought out of the shadows, making it possible to apply legal enforcement measures to it within the framework of current legislation.

The above cases are only a small part of the work of EPL’s team among the dozens of consultations that its lawyers and ecologists provide every day in order to protect the rights of residents and other actors to a safe environment and to ensure its conservation. It is not always possible to achieve quick results, especially under wartime conditions and a moratorium on inspections.

• INTERNATIONAL ACTIVITIES AND ADVOCACY

The year 2025 became a year of large-scale advocacy, strengthened international cooperation, and active participation in shaping environmental policy in Ukraine and beyond for the International Charitable Organization “Environment-People-Law.” Amid the ongoing Russian aggression and the deepening environmental crises, EPL’s team worked to ensure that the voice of the Ukrainian public was heard in decision-making processes and that environmental issues became an integral part of national and international political discussions.

Throughout the year, EPL took part in key consultations, international forums, and high-level meetings, actively cooperated with the Embassy of Germany in Ukraine, the Embassy of Romania in Ukraine, and the Delegation of the European Union to Ukraine, and also implemented a set of advocacy initiatives.

The main areas of the campaign included: holding the aggressor accountable for crimes against the environment, advancing European integration environmental reforms, shaping the policy of Ukraine’s green recovery, strengthening the protection of environmental rights, and supporting civic activists.

Holding the aggressor accountable for environmental damage. One of EPL’s key priorities in 2025 was advocating for the creation of effective mechanisms of Russia’s accountability for acts of ecocide and other international crimes against the environment, as well as mechanisms for proper compensation for environmental damage caused by the war. On 11 March 2025, EPL representatives took part in a regular working meeting of the Coordination Platform of the Register of Damage, where more than 60 participants discussed practical aspects of submitting claims under the open categories, updates on the work of the Register, plans for 2025, and key challenges in the functioning of the International Compensation Mechanism.

Later, the team also took part in the May meeting of the Coordination Platform of the Register of Damage, where the key difficulties in submitting claims under the open categories were discussed, including, in particular, the prospects for opening Category B 3.1 “Environmental Damage,” which remains an important area of advocacy for the environmental sector.

EPL also continued monitoring and covering the progress of the launch of the International Compensation Mechanism, emphasizing the critical importance of opening categories for the submission of claims, particularly with regard to environmental damage, and the need to establish a Compensation Fund as a key prerequisite for the real compensation of damage to Ukraine.





As part of EPL's 2025 advocacy campaign, we also held a press briefing on digital tools for recording and visualizing the impacts of war on the environment, presenting scientific approaches, the results of field research, and an updated online database as part of systematic work on documenting eco-crimes and strengthening the evidentiary basis for the future holding of the aggressor accountable.

On 17 June 2025, an EPL lawyer took part in an expert consultation in Geneva devoted to the challenges and best practices of documenting, investigating, and ensuring accountability for international environmental crimes, including war crimes, crimes against humanity, acts of aggression, and genocide.

In October 2025, the team carried out a series of advocacy meetings in Brazil devoted to issues of environmental justice and accountability mechanisms for large-scale environmental disasters.

The Brazilian experience became an important platform for modeling a future compensation system in Ukraine and developing arguments for holding the Russian Federation accountable for eco-crimes.

Environmental reforms and Ukraine's European integration. EPL actively promoted environmental reforms in the context of European integration, drawing attention to their critical importance for sustainable development and the fulfilment of Ukraine's international obligations.

In February 2025, EPL's team made a working visit to the Czech Republic.

There, we studied European approaches to the management of protected areas and the Natura 2000 network.

EPL also presented its work and vision regarding the reform of the biodiversity conservation system. Together with partners, EPL's team outlined the critical condition of the sector, presented four possible reform scenarios, and called on the authorized bodies to create an effective and European-integrated biodiversity management system.

Work in this area was often carried out together with the line ministry and the Committee of the Verkhovna Rada of Ukraine on Environmental Policy and Nature Management.

In addition, EPL held a working meeting with the Ministry of Economy, Environment and Agriculture, at which it presented legislative proposals on harmonizing Ukrainian nature protection legislation with the requirements of the EU Birds and Habitats Directives, including the prohibition of trade in protected species, the introduction of criminal liability for violations in the field of biodiversity protection, and the need for the official approval of Emerald Network territories.

As part of EPL's advocacy campaign in 2025, the team also joined the launch and work of the Dialogue Platform on European Integration Environmental Reforms, a new platform for cooperation between Parliament and the expert community, intended to strengthen the quality of environmental policy and bring Ukraine closer to EU environmental standards.

Within the advocacy campaign aimed at promoting reforms in the field of environmental conservation, EPL took part in a meeting on the implementation of the recommendations of the parliamentary hearings, where it emphasized the need for urgent reform of the system for managing natural forests in Lviv Oblast, in particular the unblocking of the establishment of virgin forest natural monuments and ensuring proper inventory and protective status for valuable forest areas.

In addition, EPL was among the civil society organizations that stressed that restoring the Ministry of Environment as a separate authority is critically necessary for effective reforms, fulfilment of European integration obligations, and prevention of the dismantling of environmental policy as a result of the merger of ministries.

Throughout the year, EPL deepened its cooperation with European institutions, in particular the Representation of the European Commission in Ukraine and DG Environment, the Delegation of the European Union to Ukraine etc. This made it possible to strengthen advocacy for environmental reforms, ensure the inclusion of Ukrainian issues in European policies, and build sustainable channels of professional dialogue on the transposition of directives, institutional capacity, and transparency of environmental governance. In particular, representatives of the above-mentioned institutions took part in the International Conference "Modern Environmental Policy of Ukraine: Transparency, Effectiveness and Security in Conditions of Military Aggression", which was organized by EPL and its partners.

In addition, on 5 December 2025, EPL held an online meeting with the Representation of the European Commission in Ukraine and DG Environment to discuss the progress of environmental reforms, key challenges, and the advocacy strategy for 2026.



Particular attention was given to reforms in the field of subsoil management, biodiversity protection, and institutional changes in the structure of central authorities.

Green recovery of Ukraine. EPL continued its advocacy campaign to ensure that the reconstruction of Ukraine would be “green” and based on the principles of sustainability and environmental safety.

On 21 July 2025, a representative of the organization took part in the Ukraine Recovery Conference in Rome, one of the largest international forums, where EPL promoted the integration of environmental priorities into reconstruction and drew attention to the scale of the environmental damage caused by the war.

Within the 2025 advocacy campaign, EPL also presented an environmentally balanced position on post-war recovery.

In particular, during a speech at the Academy of European Studies, Solomiia Baran emphasized the need to integrate environmental criteria, public participation, and the principles of sustainable development into all post-war reconstruction plans, thereby strengthening the organization’s advocacy efforts in the field of Ukraine’s green recovery.

EPL also joined the launch of the Green Recovery Platform of Ukraine: during the first meeting of stakeholders, Olena Kravchenko emphasized the need for systemic environmental reforms, transparent governance, and the integration of environmental principles into all areas of post-war recovery.

Protection of environmental rights, transparency, and civic activists. In 2025, EPL also focused on advocating systemic changes aimed at strengthening environmental democracy, access to information, and public participation, as well as on protecting civic activists who are fighting for a clean environment.

On 7-8 May 2025, Olha Melen-Zabramna took part in a meeting of the working group of the European Environmental Bureau, where they discussed the challenges of NGO financing and new opportunities for internal review of EU acts in accordance with the Aarhus Regulation.

In August 2025, Olena Kravchenko took part in a meeting with the leadership of the newly established merged Ministry of Economy, Environment and Agriculture of Ukraine, where environmental organizations stressed the need to preserve environmental safeguards, implement the decisions of the Aarhus Convention, and continue key reforms, emphasizing the inadmissibility of rolling back environmental standards under the pretext of deregulation.



On 10 October 2025, EPL representatives, as members of IUCN, took part in the opening of the World Conservation Congress of the International Union for Conservation of Nature in Abu Dhabi – a major global forum that brought together more than 10,000 scientists, experts, government representatives, and civil society organizations to discuss ways of renewing international environmental governance and strengthening efforts to conserve nature in conditions of growing global instability.

EPL actively advocated against development in the Carpathians, insisting on the conduct of proper SEA and EIA procedures in projects involving the placement of wind power plants and any other interventions in high mountain ecosystems.

In addition, in November 2025, EPL became an active participant in the 8th Meeting of the Parties to the Aarhus Convention, the 5th Meeting of the Parties to the Protocol on Pollutant Release and Transfer Registers, and a number of side events devoted to the protection of eco-activists, access to information, and administrative law reform. It is especially important that the Parties to the Aarhus Convention confirmed the destructive environmental consequences of the war in Ukraine and supported the development of international guidance on documenting environmental damage resulting from armed conflicts. Ukraine was obliged to submit an updated plan for implementing the decisions of the Aarhus Committee concerning production sharing agreements. Yelyzaveta Aleksieieva, Head of EPL's Information and Analytical Department, was elected to the Compliance Committee of the Protocol on PRTRs. EPL presented cases of persecution of Ukrainian eco-activists in Zakarpattia, the Carpathians, and other regions.

Summary. In 2025, EPL implemented a large-scale advocacy campaign focused on holding Russia accountable for environmental crimes, advancing European integration reforms, and protecting environmental rights. The organization actively worked at the international level, engaging with the EU, the UN, diplomatic institutions, and expert networks, and also presented legislative proposals for harmonizing Ukrainian environmental legislation with EU law. An important part of this work was the promotion of the principles of green recovery and opposition to environmentally hazardous projects, in particular development in the Carpathians without proper SEA and EIA procedures. Thanks to these efforts, EPL strengthened the voice of the public in shaping state environmental policy in wartime conditions and in preparing Ukraine for EU accession.



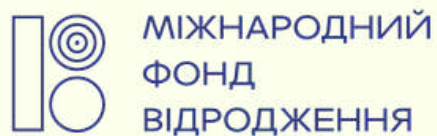
• PARTNERS AND DONORS

EEPL expresses its gratitude to its donors and partners for their support and assistance in the organization's activities in 2025:

- Sigrid Rausing Trust
- US Department of State/ELAW
- Trust for Mutual Understanding
- People in Need
- European Commission
- International Renaissance Foundation

It is extremely important for us to stand shoulder to shoulder with like-minded partners and donor organizations and to work together under the difficult conditions of wartime.

**THE
SIGRID
RAUSING
TRUST**



• FINANCIAL REPORT

The organization's revenues for 2025 amounted to 22,832,783.00 UAH.

The organization's expenses for 2025 amounted to 22,832,783.00 UAH.

