

## **Comments to the „Protocol on Conservation of Biological and Landscape Diversity“**

J. Šeffer, Y. Dovhanych & V. Pokynchereda

Draft of „Protocol on Conservation of Biological and Landscape Diversity“ is very extensive and it has several good parts and ideas, which can be used, but in general, it has to be deeply elaborated, restructured in order to be logically consistent.

General comments:

- What is difference between obligations of already ratified Conventions (CBD, Ramsar, Bern, etc.) and current version of Protocol? I do not see specific “Carpathian focus” – defining of unique biodiversity features (endemic species and habitats, species rich meadows, virgin forests, large carnivores...).
- Majority of obligations are already covered by other Conventions or international legislation (HD, BD) and enforcement is missing.
- There are many obligations, which are not feasible at all – e.g. Contracting Parties shall develop and implement the compatible biological and landscape diversity monitoring systems and shall ensure their functioning as a unified network and provide the creation of a scientific research coordination mechanism”.
- There are several components which take inspiration from Habitat Directive like develop different extensive lists (Annexes) of species and habitats, it is very unlikely to be accepted by Carpathian EU countries.
- There are no instruments how to control implementation, what will happen when any Contracting Party will not fulfill obligation.
- Concerning of Carpathian Ecological Network, Contracting Parties shall pay special attention to the designation and development of transboundary protected areas network. Why only them, why not to secure whole network.
- There is terminological confusion in terms like conenoses, ecosystem, habitat.
- Many parts of the text are overlapping.
- Many parts of the text are confusing or not clear enough.
- Many of listed districts of Ukraine located too far from Carpathians: Rohatyn, Rozhnyativ, Zhydachiv, Zhovkiv, Peremyshlyany, Mostyska, Mykolaiv, Yavoriv, Novoselytsya.
- Etc.

We have gathered 50 more comments of technical character.