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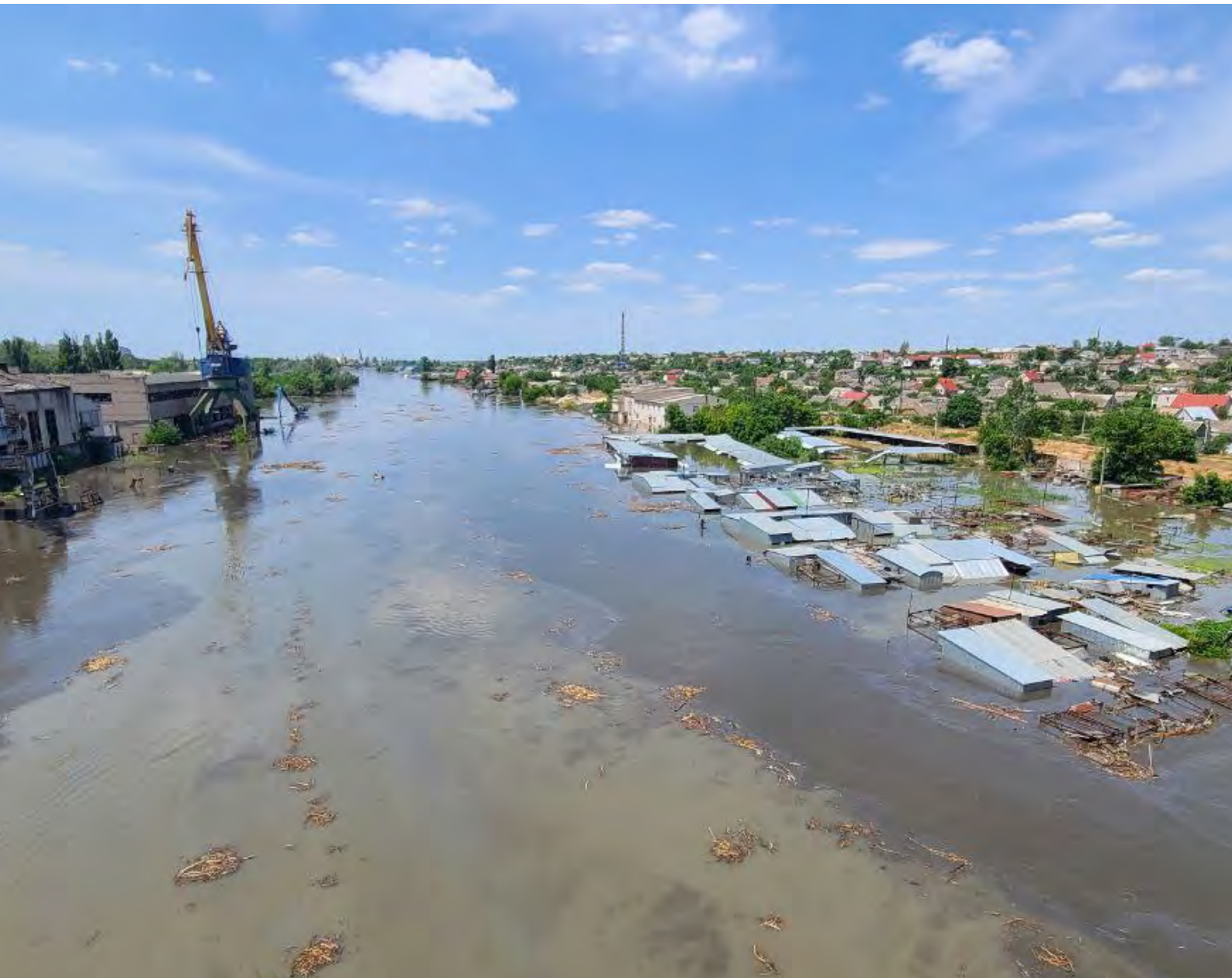
CRUDE ACCOUNTABILITY

KEY ENVIRONMENTAL VIOLATIONS COMMITTED BY RUSSIA DURING THE FULL-SCALE AGGRESSION AGAINST UKRAINE



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About Crude Accountability

Crude Accountability is an environmental and human rights non-profit organization that works with communities in the Caspian and Black Sea regions, which struggle against threats to local natural resources and negative health impacts. Crude Accountability works on the local, national, regional, and international levels in partnership with communities and organizations committed to a just and environmentally sustainable world. Based in Northern Virginia, Crude Accountability also collaborates with other environmental organizations in the United States.

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Environmental wounds, unlike national borders, know no boundaries. Damage caused to the environment by Russian hostilities in Ukraine has and will have consequences for the whole globe.[i]

[i] Truth Hounds, (2024). *Study of the Destruction of the Kakhovka Dam and Its Impacts on Ecosystems, Agrarians, Other Civilians, and International Justice* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/submerged-study-of-the-destruction-of-the-kakhovka-dam-and-its-impacts-on-ecosystems-agrarians-other-civilians-and-international-justice/.

Introduction

Armed conflicts always cause damage to the environment, but some result in particularly severe and widespread harm across multiple spheres. The ongoing war in Ukraine, home to a vast array of natural resources, seas, underground mines, and nuclear power plants like Chornobyl and Zaporizhzhia, serves as a stark example of such devastation, leading to pollution of the atmosphere, lithosphere, hydrosphere, and biosphere.

The prolonged and extremely intense nature of this conflict has led to large-scale environmental disasters caused, in particular, by the irresponsible attitude of the military and political leadership, which disproportionately prioritizes military objectives over environmental protection. This policy paper provides an overview of the main types of environmental damage caused by Russia in the context of its armed aggression against Ukraine, with a focus on potential war crimes. One of the most notorious examples is the destruction of the Kakhovka Dam, which caused widespread, severe, and long-term consequences, including the destruction of biodiversity and the contamination of water, groundwater, and soil. However, the range of environmental damage resulting from Russia's aggression is much broader and includes numerous other cases of deliberate or negligent harm to the natural environment. The rest of this study will provide a brief analysis of the OSCE's activities regarding environmental harm to Ukraine, as well as practical recommendations that could serve as a basis for rethinking and revitalizing its work, particularly in the areas of international justice and fact-finding.

Overview of Environmental Damage Caused by Russia in the Context of the Armed Conflict Against Ukraine

The brief analysis below is based on the latest and most comprehensive study of the impact of Russia's war on the environment, prepared by the Ministry of Environmental Protection and Natural Resources of Ukraine, along with partners.[1] It also incorporates findings from other key sources, in particular, international organizations and NGOs, such as Truth Hounds (whose research focused on the Russian-led breach of the Kakhovka dam and environmental damage prior to 2022), Ecoaction, and others. The paper highlights that much of the environmental damage caused by Russia's war in Ukraine results from alleged serious violations of international human rights law (IHL) perpetrated by the Russian Armed Forces. Before turning to the analysis, the authors of this opinion piece emphasize that Russian hostilities have been taking place in Ukraine since 2014; hence, the detrimental consequences of the war on the environment have been ongoing since before the full-scale invasion in 2022.

Environmental Consequences of the Armed Conflict

Generally speaking, the primary causes of environmental damage in Ukraine are, first, the hostilities themselves, which lead to mass mining, contamination of water resources, destruction of flora and fauna in forests and fields, emissions from military equipment, etc. Second, there is a deliberate disregard for environmental consequences of military actions on the part of the Russian military command, exemplified by the attack on the Kakhovka dam. Third, there is a failure of authorities to take timely measures to mitigate the damage, which worsens the state of the environment, in particular, the case of flooded mines in the Luhansk

[1] *Russia-Ukraine War: Environmental Impact Second Edition*[онлайн], (2024). Kyiv: Ministry of Environmental Protection and Natural Resources of Ukraine. Режим доступу: https://drive.google.com/file/d/1iOrYsfBlEQeJzTiv1FByDkw-dFhSM4m_/view?usp=sharing.

and Donetsk regions. The latter is mainly because some areas are off-limits for Ukrainian authorities due to the hostilities and occupation, as well as the Russian authorities not doing what they should to mitigate environmental damage caused by military operations.

As of 30 April 2022, the Ministry of Environmental Protection and Natural Resources of Ukraine estimated that the environmental damage caused by Russia in Ukraine amounted to 3843 billion UAH (around 81 billion euros), with 8,379 incidents documented by the State Environmental Inspectorate.[2] The actual figure is likely much higher due to the overall complexity of calculating environmental damage and the challenges associated with documenting incidents of environmental damage within the occupied territories.

Soil, Groundwater, and Water Contamination: Closure of Mines, Ground-Impacting Strikes, Mining, Unexploded Ordnance, and Destroyed Military Equipment

The 2021 Truth Hounds report revealed that the Russian war in the eastern part of Ukraine forced the closure of over 60% of the coal mines through uncontrolled groundwater flooding (p. 13).[3] In turn, this triggered the risk of flooding or sub-flooding of the land surface, contamination of groundwater and surface water with mine water, land subsidence leading to the destruction of buildings and infrastructure, the occurrence of man-made earthquakes, the release and explosion of methane and other gases from mines, soil degradation, runoff of hazardous substances from waste heaps into groundwater and surface water, and the release of mine gases into the atmosphere.[4]

Although the current Russian-Ukrainian war has shifted from heavy artillery, prevalent in World War I and World War II, to widespread drone use, ground-

[2] Consequences of military actions and impact on the environment [online], (no date). *Ecozagroza: Official resource of the Ministry of Environmental Protection and Natural Resources of Ukraine*. [Viewed 30 April 2025]. Available from: https://ecozagroza.gov.ua/en.
[3] *The Donbas Surroundings: The Invisible Front. The Environmental Consequences of the War in Eastern Ukraine in the Context of International Humanitarian Law and in Practical Dimensions* [online], (2021). Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/wp-content/uploads/2021/06/donbas-ecology-report-2021-truth-hounds.pdf.
[4] *ibid*.

impacting strikes like shelling still occur *en masse*. These strikes leave behind craters and can render land unsuitable for agricultural use due to the high concentration of chemical substances contained in the munitions. After detonation, these substances can remain in the soil for a long time and may "migrate"—that is, seep into groundwater and be absorbed by plants.[5]

Additionally, Ukraine is currently the most heavily landmine-contaminated country in the world, with an estimated 23% of its territory (as of Oct. 2024) at risk of contamination by landmines and unexploded ordnance, as reported by UNDP[6] and the Ukrainian government.[7] This is down from 30% in September 2023 due to employed demining efforts. Beyond soil and groundwater contamination, ground-impacting strikes, mines, and unexploded ordnance are likely to cause contamination of the water. According to 2017 OSCE reports, pollution from munitions led to increased concentrations of mercury, vanadium, cadmium, and non-radioactive strontium, as well as elevated gamma-radiation, in the sediment of the Karlivske and Kleban-Bytske Reservoirs in Donetsk Oblast (p. 31).[8]

Beyond the strikes, unexploded ordnance, and mines, the contamination of soil, groundwater, and water arises from military waste. For instance, it was estimated that at least 1.4 million tons of waste were generated from the destruction of Russian military equipment, not counting the Ukrainian losses, between 24 February 2022 and 13 September 2024 (p. 9).[9]

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[5] Hubareva, V., (2023). Ecocide: 10 environmental consequences of russia's war in Ukraine [онлайн]. *Rubryka*. [Дата звернення 30 квітня 2025]. Режим доступу: https://rubryka.com/en/article/naslidky-viiny-dlia-dovkillia/.

[6] UNDP, (2024). In Ukraine, tackling mine action from all sides to make land safe again [online]. *UNDP*. [Viewed 30 April 2025]. Available from: https://www.undp.org/eurasia/stories/ukraine-tackling-mine-action-all-sides-make-land-safe-again.

[7] Litnarovych, V., (2025). 23% of Ukraine's Land Still Mined as Demining Efforts Push Forward [online]. *UNITED24 Media*. [Viewed 30 April 2025]. Available from: https://united24media.com/latest-news/23-of-ukraines-land-still-mined-as-demining-efforts-push-forward-6649.

[8] OSCE, (2017). *Assessment of Environmental Damage in Eastern Ukraine and Recovery Priorities* [online]. Kyiv: VAITE. [Viewed 30 April 2025]. Available from: https://web.archive.org/web/20231005101518/https:/www.osce.org/files/f/documents/4/3/362566_0.pdf.

[9] *Russia-Ukraine War: Environmental Impact Second Edition*[онлайн], (2024). Kyiv: Ministry of Environmental Protection and Natural Resources of Ukraine. Режим доступу: https://drive.google.com/file/d/1iOrYsfBlEQeJzTiv1FByDkw-dFhSM4m_/view?usp=sharing.

Paul Heslop, Senior Mine Action Advisor at the UN Resident Coordinator Office in Ukraine, in an interview with UNMAS, recently highlighted such contamination of soil, groundwater, and water: "*What we have got in Ukraine, which is different to other countries I have worked in, is the areas that are perceived to be contaminated are very-very heavily contaminated. We have not seen contamination like that since WWI or WWII.*"[10]

Repercussions Arising from Dam Breaches

In Spring 2022, the Russian Armed Forces damaged the Oskil Dam in Kharkiv Oblast, causing 76% of the water to be released from the Oskil Reservoir.[11] This caused the destruction of the reservoir ecosystem, and valuable species of fish, along with other aquatic life, were wiped out. Since this reservoir supplied water to residents of Donetsk Oblast and parts of Luhansk Oblast, Russia's actions deprived a portion of the population in these regions access to water.[12]

The most egregious breach of a dam is, without a doubt, the destruction of the Kakhovka Dam by Russian Armed Forces on 6 June 2023. According to a comprehensive 300-page report prepared by Truth Hounds and Project Expedite Justice, the flood affected over 600 square kilometers, inundating over 80 settlements, displacing thousands of residents, and causing extensive damage to homes, infrastructure, and agricultural lands. Due to the topographic differences between the two sides of the Dnipro River (the left bank is much lower than the right bank), the Russian-occupied left bank was far more affected by the water stream (p. 62).[13]

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[10] UNMAS United Nations, (2025). Mine Action in Ukraine | Interview with Paul Heslop | UKR subtitles [online]. *YouTube*. [Viewed 30 April 2025]. Available from: https://www.youtube.com/watch?v=Ii92r63TETk.

[11] Hubareva, V., (2023). Endangered birds, new ecosystems, and a bunch of lakes: how the former Oskil Reservoir lives a year after the destruction [online]. *Rubryka*. [Viewed 30 April 2025]. Available from: https://rubryka.com/en/article/oskilske-vodoshovyshhe-cherez-rik-pislya-rujnuvannya/.

[12] State Environmental Inspectorate of Ukraine, (2022). *[Damages due to the destruction of the Oskil reservoir dam by the occupiers amount to over 2.1 billion hryvnias]* [Facebook]. 7 July. [Viewed 30 April 2025]. Available from: https://www.facebook.com/deiukr/posts/pfbid02wokg94E3jYUY12GAQAGq9oCfWBf5L6ZF2nmGW4dvvVUSB3xfiE5pHKHQ79WAKqQfl?_rdr.

[13] Truth Hounds, (2024). *Study of the Destruction of the Kakhovka Dam and Its Impacts on Ecosystems, Agrarians, Other Civilians, and International Justice* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/submerged-study-of-

By the end of June 2023, the Kakhovka reservoir had dried up, along with its network of distribution canals. As a result, the Kakhovka Reservoir lost its status as a reservoir, and the original Dnipro River network was restored in its place (p. 94).

The ecological impact has been profound, with significant disruption to local habitats, contamination of water bodies, and long-term adverse effects on the region's flora and fauna:

- *Habitat Loss and Species Impact:* The Kakhovka Reservoir was home to numerous species, and its destruction led to a significant loss of critical habitats. In particular, the Kakhovka Reservoir had been a key spot on the migration route for birds, and the sudden environmental shift led to disorientation and disruption in migration patterns. 11,388 tons of fish died after the draining of the Kakhovka Reservoir, with a possible extinction of 40 rare bird species (pp. 204-205).

- *Adverse effects on water and soil*: An estimated 60,509 buildings were submerged, covering a total flooded area of 8,588,175 m² (p. 120). Significant environmental impact also occurred when 465 tons of transformer oil from the Kakhovka Hydro Power Plant spilled into the water. At least 54 hazardous sites were flooded, including cemeteries, waste dumps, sewage treatment plants, oil refineries, mines, chemical factories, farms, gas stations, and fuel depots, with all contaminated water flowing into the Black Sea and affecting the shores of the Dnipro River (p. 136).

  International and national experts studied the chemical composition of the riverbed sediments and soils of the areas adjacent to the former Kakhovka Reservoir, revealing that the soil sediments of the coastal areas and the river-bed sediments of the dried Kakhovka Reservoir contain increased concentrations of heavy metals that significantly exceed the hygienic and threshold values (p. 199).

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the-destruction-of-the-kakhovka-dam-and-its-impacts-on-ecosystems-agrarians-other-civilians-and-international-justice/.

Also, the dam breach caused soil salinization. This phenomenon is likely to result in long-term degradation, making large areas unfit for agricultural or other economic activities. Moreover, the drying of the land has exacerbated the spread of invasive plant species, depletion of fertile soil, and desertification (p. 197).

- *Impact on Protected Areas*: The flooding has affected at least 2,050 km² of protected areas, including national nature parks like Velykyi Luh and Kamianska Sich. These ecosystems suffered both immediate destruction and longer-term threats from erosion, sediment deposition, and altered water quality (p. 180, 189).

- *Long-Term Effects on Local Communities*: Over 10,000 hectares of agricultural land have been impacted, leading to both local and global consequences for food security. The breach disrupted irrigation systems that served vast agricultural areas, further exacerbating the region's economic difficulties (p. 232).

For a more detailed explanation on the environmental impact of the Kakhovka breach by the Russian Armed Forces, please see the mentioned report[14] and attached graphs[15] from Truth Hounds NGO.

Air Pollution

Military operations between the Russian and Ukrainian Armed Forces have led to severe air pollution, with emissions from military vehicles, forest fires, burning oil

[14] Truth Hounds, (2024). *Study of the Destruction of the Kakhovka Dam and Its Impacts on Ecosystems, Agrarians, Other Civilians, and International Justice* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/submerged-study-of-the-destruction-of-the-kakhovka-dam-and-its-impacts-on-ecosystems-agrarians-other-civilians-and-international-justice/.

[15] Truth Hounds, (2025). The consequences of the destruction of the Kakhovka Dam – the scale of destruction and the extent of damages [online]. *Truth Hounds*. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/submerged-study-of-the-destruction-of-the-kakhovka-dam-and-its-impacts-on-ecosystems-agrarians-other-civilians-and-international-justice/.

products, and damaged industrial facilities. These pollutants pose serious long-term risks to both public health and the environment.

Fires caused by hostilities remain widespread today and were already frequent in the Donetsk and Luhansk Oblasts even before Russia's full-scale invasion in 2022 (p. 39).[16] From 24 April 2022 to 31 July 2024, at least 22,800 fires occurred due to explosions from hostilities, 1,604 of which took place within protected ecosystem sites (p. 10). For example, the Kinburn Peninsula – home to several nature reserves, including the Ivory Coast of Sviatoslav–suffered devastating fires between 24 February 2022 to 30 July 2024, which burned 96% of its territory (p. 24).[17]

The Askania-Nova Reserve in the Russian-occupied part of the Kherson Oblast suffered damage from Russian hostilities and intentional actions of the occupation authorities, including theft of animals, presence of Russian military forces, shortage of qualified personnel, and fires.[18] In particular, over 7,000ha of the total 33,000ha of the reserve were burned down due to fires in August and September 2023 (p. 22). The director of the reserve, Viktor Shapoval, reported, "*The August [2023] fire could have had catastrophic consequences. This is when the steppe in the Great Chapelsky Pod caught fire from the fall of a Russian missile fragment. This is the fenced area where some ungulates are kept. If this [were] an isolated, closed enclosure, the consequences would have been tragic. And the fire that occurred on September 1, it also entailed the actions of the occupation administration, an attempt to extinguish this fire, when the steppe was plowed, and this is truly a tragedy. That is, the fire itself is a negative factor, but the steppe ecosystems are restored after it, if the plow has not touched it - for the steppe it is actually a catastrophe*."[19]

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[16] *The Donbas Surroundings: The Invisible Front. The Environmental Consequences of the War in Eastern Ukraine in the Context of International Humanitarian Law and in Practical Dimensions* [online], (2021). Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/wp-content/uploads/2021/06/donbas-ecology-report-2021-truth-hounds.pdf.
[17] *Russia-Ukraine War: Environmental Impact Second Edition*[онлайн], (2024). Kyiv: Ministry of Environmental Protection and Natural Resources of Ukraine. Режим доступу: https://drive.google.com/file/d/1iOrYsfBlEQeJzTiv1FByDkw-dFhSM4m_/view?usp=sharing.
[18] *Ibid*.
[19] Pyrlyk, H. and Dovhopiata, D., (2025). "Aviation is flying low, animals are dying from panic": "Askania-Nova" under Russian control [online]. *Radio Svoboda*. [Viewed 30 April 2025]. Available from: https://www.radiosvoboda.org/a/novyny-pryazovya-okupatsiya-askaniya-nova/33355162.html.

Between 24 February 2022 and 13 September 2024, there were at least ninety-one strikes on fuel storage facilities, resulting in the burning of 3.1 million tons of oil and oil products. During a late June 2024 attack by Russia's Armed Forces on warehouses in the Odesa region, more than 240,000 tons of pollutants were released into the air. Combined with the destruction of forests, up to 56.2 million tons of pollutants and mixtures were emitted into the air during this period (p. 19).[20]

Additionally, the negligent acts of the Russian occupation authorities have led to significant environmental damage even beyond active hostilities. The notorious example preceding the 2022 full-scale Russian invasion of Ukraine is the story involving the largest manufacturer of titanium dioxide pigment in Eastern Europe, "TITAN," located in Armiansk, Russian-occupied Crimea Peninsula.[21] On 23 August 2018, toxic sulfur dioxide emissions were first reported in areas surrounding the "TITAN" chemical plant, affecting both the Kalanchak and Chaplynka districts of Ukraine's Kherson region and the towns of Armiansk and Krasnoperekopsk in Northern Crimea. The suspected source was the plant's water reservoir. In response, Russian-controlled authorities evacuated over 4,000 children from Armiansk, while Ukrainian officials reported that by September 2018, dozens of affected individuals had sought medical care on the mainland.[22] Despite the critical emissions, the plant has continued to operate, further exposing the environment and local population to hazardous substances and increasing the risk of long-term health and ecological consequences.[23]

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[20] War poisons the environment: as a result of Russia's armed attack on warehouses in the Odessa region, more than 240 thousand tons of pollutants were released into the air [online], (2024). *Ministry of Environmental Protection and Natural Resources of Ukraine*. [Viewed 30 April 2025]. Available from: https://mepr.gov.ua/vijna-otruyuye-dovkillya-vnaslidok-zbrojnoyi-ataky-rosiyi-po-skladah-na-odeshhyni-u-povitrya-potrapylo-ponad-240-tysyach-tonn-zabrudnyuyuchyh-rechovyn/.

[21] Association of Reintegration of Crimea, (2024). *To UN Special Rapporteur on human rights and the environment Treats for Toxic-Free Places and Pollution in the Crimea* [online]. Kyiv/Paris: Association of Reintegration of Crime. [Viewed 30 April 2025]. Available from: https://www.ohchr.org/sites/default/files/2021-11/ARC_Submission_Responces_Toxic_01_11_2021.doc.

[22] BBC News, (2018). Russia evacuates children as Crimea town 'coated in rust' [online]. *BBC Home - Breaking News, World News, US News, Sports, Business, Innovation, Climate, Culture, Travel, Video & Audio*. [Viewed 30 April 2025]. Available from: https://www.bbc.com/news/world-europe-45433463; Mendel, I., (2018). 4,000 Children Flee Pollution Disaster on Ukraine-Crimea Border (Published 2018) [online]. *The New York Times*. [Viewed 30 April 2025]. Available from: https://www.nytimes.com/2018/09/14/world/europe/crimea-ukraine-pollution.html.

[23] "Crimea TITAN". Billionaire Firtash's plant in Armyansk continues... [online], (2020). *Scanner project*. [Viewed 30 April 2025]. Available from: https://munscanner.com/2020/02/crimea-titan-

As stated earlier, the environmental impact of Russian hostilities in Ukraine goes beyond Ukraine. In terms of air pollution, the war contributes significantly to greenhouse gas emissions, which in turn accelerates climate change in the world (p. 35).[24]

Radiation Risks

On the night of 3 to 4 March 2025, Russia illegally seized the biggest European nuclear power plant, the Zaporizhzhia NPP. Besides shelling the plant during the seizure, using it as a military base,[25] and mining[26] its premises, the Russian military and security forces, along with the complicity of ROSATOM, exposed its licensed personnel to systematic and widespread torture. The unprovoked seizure of the plant and the inability to properly maintain its functioning through its initial damage, military use, and exposure of the personnel to human rights violations poses a significant threat to nuclear safety, environmental security, and international law.[27]

billionaire-firtash-s-plant-in-armyansk-continues-working-after-an-emissions-release-and-despite-the-sanctions/.

[24] *Russia-Ukraine War: Environmental Impact Second Edition* [онлайн], (2024). Kyiv: Ministry of Environmental Protection and Natural Resources of Ukraine. Available from: https://drive.google.com/file/d/1iOrYsfBlEQeJzTiv1FByDkw-dFhSM4m_/view?usp=sharing.

[25] IAEA Director General Statement to United Nations Security Council | IAEA [online], (2023). *International Atomic Energy Agency | Atoms for Peace and Development*. [Viewed 30 April 2025]. Available from: https://www.iaea.org/newscenter/statements/iaea-director-general-statement-to-united-nations-security-council-30-may-202;

[26] Update 207 – IAEA Director General Statement on Situation in Ukraine [online], (2024). *International Atomic Energy Agency | Atoms for Peace and Development*. [Viewed 30 April 2025]. Available from: https://www.iaea.org/newscenter/pressreleases/update-207-iaea-director-general-statement-on-situation-in-ukraine

[27] Truth Hounds, (2023). *In A Nuclear Prison: How Rosatom Turned Europe's Largest Nuclear Power Plant into a Torture Chamber and How Can The World Stop It* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/in-a-nuclear-prison-how-rosatom-turned-europes-largest-nuclear-power-plant-into-a-torture-chamber-and-how-can-the-world-stop-it/. *See also*, OHCHR, (2024). *Human Rights Situation During the Russian Occupation of Territory of Ukraine and Its Aftermath: 24 February 2022 -31 December 2023* [online]. OCHR. [Viewed 30 April 2025]. Available from: https://ukraine.ohchr.org/sites/default/files/2024-04/2024-03-20%20OHCHR%20Report%20on%20Occupation%20and%20Aftermath_EN.pdf, pp. 22-23.

Moreover, on the night of 14 February 2025, preceding the opening on the same day of the biggest strategic security forum in the world, the Munich conference, Russia struck the protective shelter of the destroyed 4th reactor at the Chornobyl Nuclear Power Plant, Kyiv Oblast, Ukraine.[28] This structure, completed in 2019, was designed to contain the radioactive remnants of reactor No. 4, the site of the 1986 disaster. The lead engineer for the Chornobyl NSC and Sarcophagus, Artem Siriy, reported that the strike sparked a fire—extinguished only three weeks later—which caused damage to 50% of the roof structure. As a result, the roof structure no longer functions as designed and licensed.[29]

This is, of course, without mentioning Russia's initial seizure of the Chornobyl Nuclear Power Plant at the outset of the full-scale invasion and the threats[30] it posed to nuclear security[31] by moving Russian heavy machinery in the exclusion zone and subsequently disturbing contaminated territory as well as sending up radioactive dust (paras 91, 93, 96; page 9), digging trenches in the most radionuclide contaminated soil,[32] loss of off-site electrical power (para. 107), damage to the plant's property (para. 105), pillaging the plant's property (para. 105/page 29) and mining its territory (paras 99, 104-105, 110). These radiation risk

[28] Barker, K., Kramer, A. E. and Nauman, Q., (2025). Russian Drone Damages Radiation Shield at Chernobyl, Ukraine Says [online]. *The New York Times*. [Viewed 30 April 2025]. Available from: https://www.nytimes.com/2025/02/14/world/europe/chernobyl-drone-ukraine-russia-nuclear.html; Post, K., (2025). 'Nuclear blackmail:' Russia strikes Chornobyl as world leaders gather for Munich Security Conference [online]. *The Kyiv Independent*. [Viewed 30 April 2025]. Available from: https://kyivindependent.com/nuclear-blackmail-russia-strikes-chornobyl-as-munich-security-conference-kicks-off/.

[29] Green Peace, (2025). Greenpeace mission reports: Fifty percent of north roof structure of Chornobyl New Safe Confinement Shelter severely damaged after Russian drone attack [online]. *GreenPeace*. [Viewed 30 April 2025]. Available from: https://www.greenpeace.org/ukraine/en/news/3504/fifty-percent-of-north-roof-structure-of-chornobyl-new-safe-confinement-shelter-severely-damaged/.

[30] Radynskyi, O., (2023). What Were the Russians Doing in Chornobyl? [online]. *The Atlantic*. [Viewed 30 April 2025]. Available from: https://www.theatlantic.com/international/archive/2023/09/russia-ukraine-chernobyl-disaster/675083/.

[31] Reuters, (2022). IAEA says Russia's Chornobyl occupation was very dangerous [online]. *The Atlantic*. [Viewed 30 April 2025]. Available from: https://www.reuters.com/world/iaea-says-it-has-agreed-with-ukraine-help-repair-damage-chornobyl-2022-04-26/.

[32] Sing for Science, (2023). Onuka (Ukraine): Vidlik (Radiobiology with Chornobyl researcher Olena Pareniuk) [online]. *YouTube*. [Viewed 30 April 2025]. Available from: https://www.youtube.com/watch?v=6d6mPsXMMrQ.

examples clearly also demonstrate the use of nuclear blackmail by Russia, not only against Ukraine but the world.[33]

The incidents mentioned in this report are only a small glimpse into the ways Russia's war harms the environment, both directly and indirectly. In reality, these are just a small portion of the documented instances, and the full scope of the damage extends far beyond what is covered here.

Alleged War Crimes: The Cause of Environmental Damage in Many Instances

As stated earlier, one of the main causes of environmental damage in Ukraine is the negligent behavior of the Russian Armed Forces. Specifically, Russian commanders and their subordinates carry out attacks that inflict damage, often causing disproportionate harm to the environment. As of 15 October 2024, the Office of the Prosecutor General of Ukraine (OPG) was investigating 209 criminal cases for war crimes against the environment, 14 of which could potentially be classified as ecocide.[34]

One of the most glaring examples of serious violations of international humanitarian law with regard to the environment is the destruction of the Kakhovka Dam on 16 June 2023. Truth Hounds' report, mentioned above, firmly highlights that there is at least a reasonable basis to believe that the explosion was caused by the Russian Armed Forces. Evidence, including seismic data, eyewitness accounts, and satellite imagery, strongly suggests that Russia allegedly used explosive devices to blow up the dam. The presence of Russian troops, prior dam mining, and strategic water level elevation further corroborate this conclusion. The

[33] IAEA, (2022). *Nuclear Safety, Security and Safeguards in Ukraine: 2nd Summary Report by the Director General, 28 April – 5 September 2022* [online]. IAEA. [Viewed 30 April 2025]. Available from: https://www.iaea.org/sites/default/files/documents/ukraine-2ndsummaryreport_sept2022.pdf?utm_source=chatgpt.com.

[34] According to Article 441 of the Criminal Code of Ukraine, ecocide is defined as "Mass destruction of flora or fauna, poisoning of the atmosphere or water resources, as well as other actions that may cause an ecological disaster"; Kravchenko, O., (2024). The Prosecutor General's Office is investigating 209 criminal proceedings for war crimes against the environment [online]. *Liviy Bereg*. Available from: https://lb.ua/society/2024/10/15/639833_ofis_genprokurora_rozsliduie_209.html

report attributes the dam's immediate destruction to the 205th Separate Motor Rifle Brigade of the Russian Armed Forces (p. 48).

Truth Hounds' report demonstrates that the environmental damage caused meets the criterion of severe, widespread, and long-term harm, as outlined in Article 8(2)(b)(iv) of the Rome Statute regarding the war crime of a disproportionate attack. The damage was excessive in relation to the expected military advantage, thereby constituting the aforementioned crime (p. 245). Besides attacking the Kakhovka Dam and causing disproportionate environmental damage, the Russian Armed Forces, along with the occupying authorities, failed to take adequate measures to mitigate the resulting environmental harm in the most flooded area—on the occupied left-bank of the Dnipro River (p. 109). Russian occupying forces reported over 60 civilian fatalities in the affected areas, with an undisclosed number still missing.[35] Independent verification of this data was impossible as Russian occupying forces barred access to the area by international humanitarian organizations.[36] At the same time, Ukrainian authorities estimated over 500 deaths solely in Oleshky, a small town downstream of the dam on the left bank.[37] The high number of casualties was eventually corroborated by an Associated Press investigation, which revealed deliberate and vast undercounting of the actual human cost by Russian occupation authorities.[38]

[35] Dotsenko, M., (2025). The occupiers reported new data on the number of deaths from the explosion of the Kakhovka hydroelectric power station [online]. *Most*. [Viewed 30 April 2025]. Available from: https://most.ks.ua/news/url/okupanti-povidomili-novi-dani-pro-kilkist-zagiblih-vnaslidok-pidrivu-kahovskoji-ges/.

[36] Sitnikova, I., (2023). The ICRC mission in Ukraine was never granted access to the left bank of the Dnieper River after the Kakhovka hydroelectric power station was blown up. [online]. *Hromadske*. [Viewed 30 April 2025]. Available from: https://hromadske.ua/posts/misiya-mkchh-v-ukrayini-tak-i-ne-otrimala-dostupu-na-livij-bereg-dnipra-pislya-pidrivu-kahovskoyi-ges.

[37] Romanenko, V., (2023). Hydroelectric power plant explosion: hundreds of residents of occupied Oleshki died due to Russians' refusal to evacuate - Central Intelligence Agency [online]. *Ukrainska Pravda*. [Viewed 30 April 2025]. Available from: https://www.pravda.com.ua/news/2023/06/19/7407547/.

[38] Kullab, S. and Novikov, I., (2023b). Russia covered up and undercounted true human cost of floodings after dam explosion, AP investigation finds [online]. *Associated Press*. [Viewed 30 April 2025]. Available from: https://web.archive.org/web/20240503152552/https:/apnews.com/article/russia-ukraine-war-dam-collapse-kakhovka-kherson-daacdc431f42912dfb91548794f03a3c.

The Russian breach of the Kakhovka Dam clearly demonstrates that environmental damage is often deliberately inflicted, constituting a war crime due to the disproportionate harm it causes to the environment.[39]

Steps Taken to Battle Injustice

In pursuit of justice, both governmental and non-governmental actors have been actively engaged in documenting and seeking accountability for Russia's environmental crimes. Since 2023, the Office of the General Prosecutor of Ukraine through its specialized environmental agencies has recorded these violations in a secure national database, utilizing advanced documentation technologies such as drones and remote sensing tools.[40] Recently, the Ukrainian OPG has officially brought *in absentia* the case about the so-called director of the Askania-Nova biosphere reserve, who illegally transferred animals of rare and endangered species to Russia during the occupation of this territory. The case will be tried in Ukraine.[41]

To enhance domestic prosecution and global accountability, Ukrainian and non-Ukrainian NGOs have engaged in the documentation of Russia's environmental damage far earlier than the full-scale invasion.[42] For instance, Truth Hounds NGO has recently contributed to the ICC's Draft Environmental Crimes Policy, highlighting the need to enhance the legal clarity of norms on responsibility for 'environmental' war crimes and promote accountability for such crimes,

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[39] Truth Hounds, (2024). *Study of the Destruction of the Kakhovka Dam and Its Impacts on Ecosystems, Agrarians, Other Civilians, and International Justice* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/submerged-study-of-the-destruction-of-the-kakhovka-dam-and-its-impacts-on-ecosystems-agrarians-other-civilians-and-international-justice/.

[40] Ukraine. Office of the Prosecutor General, (2023). *On approval of the Regulations on the Specialized Environmental Prosecutor's Office (as a Department) of the Prosecutor General's Office* Order of the Office of the Attorney General No. 185 [online], 5 July. [Viewed 30 April 2025]. Available from: https://zakon.rada.gov.ua/laws/show/v0185905-23#Text.

[41] Kovalenko, A., (2025). Ukraine tries Russian-appointed director of Askania-Nova biosphere reserve [online]. *Ukrainska Pravda*. [Viewed 30 April 2025]. Available from: https://www.pravda.com.ua/eng/news/2025/02/4/7496749/.

[42] *The Donbas Surroundings: The Invisible Front. The Environmental Consequences of the War in Eastern Ukraine in the Context of International Humanitarian Law and in Practical Dimensions* [online], (2021). Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/wp-content/uploads/2021/06/donbas-ecology-report-2021-truth-hounds.pdf.

particularly as environmental harm increasingly becomes a tool of war and conflict..[43] Similarly, Truth Hounds, in partnership with Project Expedite Justice, conducted an official advocacy mission to South Africa, the only country in Africa operating a nuclear power plant, where they presented to the Department of International Relations and Cooperation the security and geopolitical risks arising from ROSATOM's operation of nuclear power plants.[44] As mentioned, ROSATOM has played a key role in the illegal seizure of the Zaporizhzhia Nuclear Power Plant and is alleged to be complicit in the torture of a number of Ukrainian plant employees.[45]

[43] Truth Hounds, (2025). Truth Hounds' Contribution to the ICC's Draft Environmental Crimes Policy [online]. *Truth Hounds*. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/truth-hounds-contribution-to-the-iccs-draft-environmental-crimes-policy/.
[44] Truth Hounds [truth_hounds], (2025). *[Can South Africa lead the charge for nuclear safety in Ukraine? Dmytro Koval, Co-Executive Director of Truth Hounds, wrote an opinion piece inspired by the team's advocacy trip to South Africa in early March]* [X]. 4 April. [Viewed 30 April 2025]. Available from: https://x.com/truth_hounds/status/1908094607935578321
[45] Truth Hounds, (2023). *In A Nuclear Prison: How Rosatom Turned Europe's Largest Nuclear Power Plant into a Torture Chamber and How Can The World Stop It* [online]. Kyiv: Truth Hounds. [Viewed 30 April 2025]. Available from: https://truth-hounds.org/en/cases/in-a-nuclear-prison-how-rosatom-turned-europes-largest-nuclear-power-plant-into-a-torture-chamber-and-how-can-the-world-stop-it/.

The OSCE's Activities in the Field of Environmental Protection in Ukraine & Recommendations for Improvement

The environment is one of the key areas of the OSCE's work. It is explicitly mentioned in the 1975 Helsinki Final Act and in the Charter of Paris for a New Europe considered core to the OSCE system documents.[46] In particular, the latter document contains the following commitment of the signing States: '*We pledge to intensify our endeavours to protect and improve our environment in order to restore and maintain a sound ecological balance in air, water and soi*l.'[47] Economic and environmental issues are the second dimension of the OSCE's activities. However, in recent years, the organization's activity in this area was not widespread in comparison to the first (*i.e.* politico-military) and third (*i.e.* human) dimensions. Moreover, in practice, environmental issues are most often considered in connection with economic activity, while the impact of armed conflicts on the environment remains less visible. Of course, this is partly explained by the fact that armed conflicts cover limited territories and usually last for a shorter period than peacetime. At the same time, it is during armed conflicts that damage to the environment increases drastically, as clearly demonstrated by the experience of the Russian war in Ukraine from 2014 to the present day.

Since 2014, certain attempts have already been made within the OSCE to reduce environmental damage. Roman Filonenko, Director of the Department of Waste Management and Environmental Safety, stated that since 2014, Ukraine has consistently raised the issue of underwater and soil pollution within the framework of the Trilateral Contact Group on the peaceful settlement of the conflict,

[46] Conference on Security and Co-Operation in Europe: Final Act, (1976). *American Journal of International Law*[онлайн]. 70(2), 417–421, cited as 1975 Helsinki Final Act; Conference on Security and Cooperation in Europe (1990 Paris, France), (1990). Charter of Paris for a new Europe cited as: Charter of Paris for a new Europe.
[47] Charter of Paris for a new Europe p. 10.

mediated by the OSCE.[48] However, representatives of Russia and the administrations of the so-called 'DPR' and 'LPR' under its effective control have repeatedly obstructed Ukraine's efforts to carry out environmental monitoring in the occupied territories, using various pretexts to deny access to both Ukrainian and international experts. Russia agreed to allow international experts to enter only after contaminated mine water from the occupied territories began to deteriorate the quality of drinking water in the Rostov region. However, with the start of full-scale war, the issue was put on hold. Another initiative by Ukraine – the creation of 'safety islands' around dangerous facilities (such as the coke plant, Stirol, and the Donetsk Chemical Plant) with the withdrawal of troops and an audit – was also rejected by Russia.[49]

Since 2014, the OSCE has been involved in certain activities in Ukraine in the context of environmental damage caused by the armed conflict. In particular, as part of the 'Assessment of Environmental Damage in Eastern Ukraine' project, which began in 2017, the 'Environmental Assessment and Recovery Priorities for Eastern Ukraine'[50] initiative was launched. At that time, the active OSCE Project Coordinator in Ukraine also conducted other studies and publications on environmental damage.[51] In 2022, due to the blockade by the Russian Federation, both the OSCE Project Coordinator in Ukraine and the OSCE Special Monitoring Mission to Ukraine ceased their activities, which significantly weakened the organization's presence in Ukraine. The former project operated in Ukraine since 1999 and was actively involved in many processes, including support for reforms. Nevertheless, on 16 June 2022, in its last month of operation, the OSCE Project Coordinator in Ukraine, together with partners, managed to launch a joint project called Ecodozor, which monitors risks and consequences of environmental

[48] SPRAVDI (2023) *Remember Everything: Russians Began to Destroy Ukraine's Environment in 2014 - Центр стратегічних комунікацій* [online], (2023). SPRAVDI. [Viewed 30 April 2025]. Available from: https://spravdi.gov.ua/en/remember-everything-russians-began-to-destroy-ukraines-environment-in-2014/

[49] *ibid.*

[50] OSCE. (2017) *Environmental Assessment and Recovery Priorities for Eastern Ukraine*, Kyiv: Organization for Security and Co-operation in Europe. [Viewed 30 April 2025]. Available from: https://www.osce.org/project-coordinator-in-ukraine/478393

[51] OSCE. *Library of publications on environmental issues in conflict-affected area*, Organization for Security and Co-operation in Europe | *OSCE*. [Viewed 30 April 2025]. Available from: https://www.osce.org/project-coordinator-in-ukraine/478393

damage.[52] Subsequently, the initiative for OSCE involvement in Ukraine was taken over by the OSCE Secretariat Extra-Budgetary Support Programme for Ukraine, which also implements environmentally oriented programs, in particular in the area of supporting the government in the process of clearing land contaminated by mines.[53]

Nevertheless, the OSCE has recently been subject to considerable criticism. Russia's and Belarus' violations of the Helsinki principles raise questions about whether the spirit of these principles is still alive and whether they can be implemented.[54] A significant problem for the OSCE as an organization remains its frequent inability to reach consensus in decision making, which limits its activities to declarative statements that are rarely put into practice. Although these observations may seem general, they clearly reflect the problems of stagnation in the field of environmental protection, which, even without the armed conflict, remains an issue that does not receive sufficient attention. When environmental issues do become a topic of discussion, the rhetoric tends to focus on the consequences, which are undoubtedly important. At the same time, it is equally important to pay attention to opportunities for prevention and to establish responsibility for the consequences caused.

It seems that in the current geopolitical environment, deep cooperation between states, NGOs, international organizations and other stakeholders is necessary to 'revive' the Helsinki principles. A paradigm shift is needed: from perceiving the OSCE as an abstract organization with a certain mandate to understanding that the OSCE is primarily composed of specific states, and that it is their commitment and political will that are key to achieving real progress in its activities. A striking example is the Secretariat's Extrabudgetary Support Programme for Ukraine, which is funded by individual OSCE States despite the suspension of the main

[52] OSCE (2022). *OSCE-supported platform highlights environmental risks stemming from war in Ukraine*. Organization for Security and Co-operation in Europe | *OSCE*. [Viewed 30 April 2025]. Available from: https://www.osce.org/project-coordinator-in-ukraine-closed/520442
[53] OSCE (2023). *Support to Environmental Rehabilitation with Focus on Building National Humanitarian Mine Action Capacities of Ukraine*. Organization for Security and Co-operation in Europe | OSCE. [Viewed 30 April 2025]. Available from: https://www.osce.org/osce-secretariat-exb-support-programme-for-ukraine/539711
[54] Liechtenstein, S., (2022). *Exclusive: OSCE to invest 28.7 million Euros in support program for Ukraine*. Security and Human Rights Monitor. [Viewed 30 April 2025]. Available from: https://www.shrmonitor.org/exclusive-osce-to-invest-28-7-million-euros-in-support-program-for-ukraine/

programs in Ukraine. This dialogue must move to a new level, involving a core group of active interested states and other stakeholders who will advocate for effective and bold steps. In particular, this includes more creative use of the mandates of OSCE institutions and more active use of the Chairmanship mandates.[55] In particular, given this year's Chairperson-in-Office, this may be especially relevant in the context of the work of the Special Representative of the OSCE Chairperson-in-Office on Climate and Security.

Practical Recommendations

The OSCE faces many challenges, including in the field of environmental protection. However, given the specific nature of this document and the work of Truth Hounds NGO, whose main goal is to promote justice in the context of international crimes, including environmental crimes, we focus here on recommendations that address the practical obstacles we face.

i. Promoting Justice and Accountability

The promotion of justice is extremely important both in terms of prevention and in terms of bringing to justice those responsible for crimes already committed against the environment. Contemporary international law predominantly embodies an anthropocentric approach to environmental protection, i.e., it considers damage to the natural environment primarily through the prism of its impact on humans. However, in order to truly effectively address the problem, the global community must move towards an ecocentric approach, in which the environment itself is recognized as an independent value, and causing harm to it is considered a violation in itself – even in cases where direct negative consequences for humans are difficult to establish.

One of the present-day challenges is the prosecution of war crimes against the environment within the framework of the International Criminal Court (ICC). Currently, the only provision of the Rome Statute that directly refers to the

[55] Should We Preserve the OSCE as a Platform for Dialogue? - Centre for Civil Liberties (05 October 2022). [Viewed 30 April 2025]. Available from: https://ccl.org.ua/en/news/should-we-preserve-the-osce-as-a-platform-for-dialogue/

environment is Article 8(2)(b)(iv). However, it has never been applied in an environmental context. Moreover, the wording of this article sets an extremely high threshold for its application, including cumulative criteria of 'widespread, long-term and severe' damage to the environment, the complexity of assessing proportionality and establishing intent (*mens rea*).[56] Although the ICC operates independently of the OSCE, the vast majority of OSCE member states are parties to the Rome Statute. This does not give them direct influence over the Court's application of the law, but it does open up opportunities for political initiatives, particularly in the areas of research, advocacy, and possibly proposals to amend the wording of the Statute. Such efforts could highlight the importance of permanent international justice for security in Europe and strengthen the ICC's potential in the field of environmental protection.

One example of this cooperation is the ongoing work of the Office of the Prosecutor of the International Criminal Court on the Policy Paper on Environmental Crimes.[57] As part of this process, the Office invited various organizations and other stakeholders to submit their comments and recommendations on the content of the document. Among them was the Truth Hounds NGO, which, as mentioned earlier, submitted its proposals to strengthen the effectiveness of environmental protection within the framework of the ICC's activities.[58] The OSCE Chairperson-in-Office on Climate and Security could be involved in this process, for example, by making proposals from their office or aggregating the efforts of various actors for joint submission.

The authors of this report are fully aware of the challenges in the interaction between the OSCE and the International Criminal Court. At the same time, as already noted, the OSCE is, first and foremost, a platform for intergovernmental cooperation that brings together the political will of its members. With such will, the organization can become an important forum for discussing environmental justice issues, drawing on its extensive experience of cooperation with international actors, including non-governmental organizations.

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[56] Truth Hounds (2025). *Truth Hounds Submission to the ICC Office of the Prosecutor on the Policy Initiative to Advance Accountability for Environmental Crime.* Available from: https://truth-hounds.org/wp-content/uploads/2025/03/submission-to-the-icc-office.pdf, p. 17

[57] ICC, The Office of the Prosecutor (2024), *Draft Policy on Environmental Crimes Under the Rome Statute* (18 December 2024). Available from: https://www.icc-cpi.int/sites/default/files/2024-12/2024-12-18-OTP-Policy-Environmental-Crime.pdf

[58] *supra* note 57.

An additional area in which OSCE member states can demonstrate advocacy leadership is promoting the recognition of ecocide as a distinct international crime, in particular by introducing relevant amendments to the Rome Statute. Unlike the current Article 8(2)(b)(iv), an ecocentric interpretation of the concept of ecocide provides for a lower threshold for recognizing the crime and does not limit its application to the context of armed conflict. This opens up broader possibilities for international justice in protecting the environment as an independent value.

ii. Support Truth Finding

Establishing the truth is a key prerequisite for further understanding environmental vulnerability, holding those responsible to account, and laying the foundations for improving legal and political mechanisms for environmental protection. Documentation and investigation are among the main tools used in the modern world to assess the environmental consequences of armed conflict. This process involves the state, international missions and organizations, as well as non-governmental organizations.

At present, it seems that the OSCE is largely focusing its efforts on supporting state efforts, which is entirely understandable and often appropriate. This is particularly evident in joint projects with the Ministry of Environmental Protection and Natural Resources of Ukraine. However, it is equally important to also support grassroots actors, who are making significant contributions in this area. In Ukraine, a number of NGOs are actively engaged in addressing environmental harm, documenting it, researching, and finding solutions to mitigate the environmental damage, *etc.* These actors serve as an important asset for investigative and prosecutorial bodies, and also play a key role in shaping public policy. In light of recent events, many of them are facing serious challenges in securing funding and maintaining the sustainability of their operations.

One of the important and, in our opinion, successful cases in the field of environmental protection is the joint report by Project Expedite Justice and Truth Hounds on the consequences of the destruction of the Kakhovka Dam. This is a comprehensive document containing its own investigation of possible scenarios

for the damage to the dam, identification of potential perpetrators, and an assessment of the environmental, economic, and humanitarian consequences. In addition, the report offers a robust legal qualification of the incident. The report has been widely shared with both international and national stakeholders. In particular, at the national level, it has provided substantial support to the ongoing investigation being carried out by specialized environmental agencies.

iii. Proactive Use of the Chairpersonship Mandate, in Particular the OSCE Chairperson-in-Office on Climate and Security

Given the current obstacles in work of the Permanent Council and the Ministerial Council, other OSCE bodies should take more initiative, interpret their mandates more proactively, and take a more active stance on launching new initiatives. It seems that one of the most promising areas of work is the institution of the Chairmanship, in particular the activities of representatives in the Office of the Chair. This year, Finland appointed an OSCE Chairperson-in-Office on Climate and Security, which is already an important step towards recognizing the environment as a priority issue. However, the effectiveness of this mandate will largely depend on the initiatives implemented by the new office.

Given the representative's authoritative position, their initiatives could become an important platform for intergovernmental discussion of further steps in the field of environmental protection. It is particularly crucial that these processes encourage the participation of civil society representatives, who often have valuable knowledge, analysis from the field and direct experience in responding to environmental challenges. Such inclusive discussions will not only strengthen the legitimacy and validity of future decisions but also reinforce the link between the political level and real needs on the ground.

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