

ASSOCIATION OF REINTEGRATION
OF CRIMEA

France, Paris, 14 Avenue de l'Opera, 75001
Ukraine, Kyiv, 56 Kharkivske highroad, 02175
arcconstructionofcrimea@gmail.com
27.02.2025 № 151/2025

To UN Special Rapporteur on the rights to water and sanitation

Russian Aggression in Ukraine and Challenges for Democratic Water Governance

DrHab Borys Babin, PhD Olexiy Plotnikov, PhD Andrii Chvaliuk PhD Anna Prikhodko

Our Association of Reintegration of Crimea (ARC), is non-governmental expert and human rights organisation[1], with activities devoted to Crimea's issues. ARC informs UN, CoE and OSCE structures and publishes analytics regarding challenges for human rights in Crimea. In 2020-2024 ARC sent more than 250 relevant submissions to UN HRC bodies, including information on the ongoing water crisis in Crimea[234], its indigenous peoples[5] and sustainable development challenges[6], ARC made more than 20 publications on this issue[7].

Sending Association's submission for UN Special Rapporteur's questionnaire.

In the Crimean peninsula, illegally controlled by Russia, negligence and illegal actions of the so called "authorities" caused since the water crisis that is a key challenge for the region's rural areas. UN GA resolution 76/179 pointed that Russia as occupying State bears all responsibility for ongoing water crisis in Crimea[8] and European Court on Human Rights refused in 2021 to oblige Ukraine supply water to Crimea by the North Crimean Channel[9].

Experts of ARC held consultations with Crimean Tatar representatives and took part in conferences devoted to Crimean issues, including water crisis challenges, and in "Crimean Platform" high-level summit in Kyiv.

ARC highlighted the brutal violation of the international ecologic and environmental law by "Siemens" and "Grundfos" companies that supplied in 2020-2021 industrial water pumps to the Crimean "administration"; such pumps' exploitation in military purposes destroyed the unique ecosystem of Zuya River valley, traditional for the Crimean Tatars. We informed German and Danish officials, European Commission and ecologic organisation, relevant investigation was held by the Dutch Business Authority due to our complaint.

ARC human rights' activities caused the aggressive reaction of the Russia's so-called "authorities" in Crimea. ARC's expert, professor Borys Babin was declared as allegedly "extremist" by such "authorities", relevant "criminal proceedings" were initiated by them.

The key challenge for Crimea since 2015 was the water crisis that appeared exactly due to the policies of the Russia's "authorities" in conditions of the climate change. Russia established its effective control over Crimea with its 2,5 million inhabitants in 2014. In the next years,

[1] https://www.journal-officiel.gouv.fr/associations/detail-annonce/associations_b/20210005/1348
[2] https://www.ohchr.org/Documents/Issues/Water/PlanningReportWater/input-nonstates/Association-of-Reintegration-of-Crimea.doc
[3] https://www.ohchr.org/sites/default/files/2022-01/Association-of-Reintegration-of-Crimea.pdf
[4] https://www.ohchr.org/Documents/Issues/Environment/EnvironmentWater/Civil%20Society/ARC.doc
[5] https://www.ohchr.org/Documents/Issues/IPeoples/SR/Urban-areas_Submissions/Indigenous_Organisations_Civil_Society/association-of-reintegration-of-crimea.pdf
[6] https://www.ohchr.org/Documents/Issues/Food/FoodSystems/CSO/ARC.doc
[7] https://www.ejiltalk.org/the-proceedings-flow-while-water-does-not-russias-claims-concerning-the-north-crimean-canal-in-strasbourg/
[8] https://undocs.org/en/A/76/PV.53
[9] https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-7085775-9583164&filename=Inter-State%20case%20brought%20by%20Russia%20against%20Ukraine.pdf

Russia has relocated over 500 thousand of its residents to Crimea. Russia initiated large military infrastructure projects in Crimea, requiring massive water supply.

Russian business structures, controlled by its Government, commenced a programme of massive residential housing construction for the Russia's settlers and military personnel in Crimea. Russia-controlled "regional and municipal authorities" paid no attention to plumbing and sanitation systems, as well as sewage treatment plants in Crimea. Crimea is an arid zone, local water resources were sufficient for the population before 2014, but they are insufficient for the present enlarged demands.

In 2020-2021 the water crisis in Crimea intensified. Russia's "authorities" in the Crimea did nothing to ensure that any parts of Crimea's society have access to reliable, timely and easy to comprehend information on all aspects such processes. All Russia's infrastructural activities in Crimea are corrupted and non-transparent[10]. Russia's "authorities" did not provide any protection guarantees in peninsula, related to climate change. The only compensation is paid by Russia to own army personnel, as for "military service in the arid zone"[11].

ARC submitted to the UN HRC the proposals on two Crimea-related natural objects to the researchathon on sacrifice zones and human rights, such as Sivash and Kalamita bays, discussed it with Indigenous Peoples Rights International. ARC informed society on ecologic disaster connected with flooding Yevpatoria town with the waters of Sasyk-Sivash, and on catastrophic changes in Lake Sasyk's hydrology, including new floods in Crimea's Saky District and entry of chemical waste from the Saki plant into open watercourses.

Russia-controlled structures in the Crimea, which provide access to water and sanitation, are totally corrupted and non-effective. Losses in the water supply networks are more that 50 % of current resources, all expenses made are not transparent.

There is no effective mechanism available in Crimea to submit complaints regarding access to safe drinking water and sanitation as well as obtain information on how those complaints were handled and resolved. Crimea's human rights defenders and activists who stand up for the human rights to safe drinking water and sanitation of indigenous peoples are under permanent fear and harassment. The example of Ludvica Papadoupulu may be pointed, blogger from Yalta, who was persecuted by the Russia's punitive structures in 2020-2021 for her posts in the social networks on the ecologic issues. ARC reflected the repressions against Mr. Papadoupulu in our statements to UN HRC and OSCE structures.

Water always had specific, sacral importance for the Crimean Tatar people in arid Crimea. Now the Russia-controlled "Water of Crimea" is responsible for the water management in the region and it has no cooperation with Crimean Tatars. Crimean Tatars and their communities have no effective access to water management issues in the Crimea since 2014.

Economic and water crisis in Crimea forces Crimean Tatars to resettle to Simferopol since 2015. At the same time exactly Simferopol, central city of the Crimea, became a destination for most Russian citizens illegally resettled by the Russian "authorities" to Crimea, including "military officers", "officials", "servicemen", and their families.

The quantity of city's population increased from 300 thousand in 2014 to 500 thousand in 2020 and it continues to grow. Yet, the infrastructure of Simferopol does not satisfy the needs of its half-million residents. In 2020-2021, the deficiencies in the city and regional management of the Russian "authorities" caused the systematic water crisis in Simferopol and other localities of Crimean urbanized settlements. Chaotic construction of residential and non-residential buildings by the Russia-controlled commercial structures associated with the "authorities",

[10] https://owncloud.unog.ch/s/6mVH9jIGqR6vKSP?path=%2FCSOs#pdfviewer
[11] https://www.rbc.ru/society/27/11/2019/5dde8f309a794752ab7f9660

accompanied by failure to comply with any imaginable architectural and safety standards, ruins the unique landscapes and creates risks for the residents of Crimean cities.

Since 24th of February 2022 Russia committed broad and open military aggression to all Ukraine's territory. Russia refused to execute the ICJ order in this case to stop the aggression[12]. Russia-controlled troops and mercenaries committed in Ukraine, during this invasion, gross violation of international law already, including broad crimes against environment, attacks on dams, riparian and maritime ecosystems [13][14][15][16][17][18][19]. All war crimes, committed by Russian invaders during ongoing hostilities, are connected with absolutely clear Russia's war targets in maximal destruction the civil infrastructure and environment, including water management objects[20], essential for all Ukrainian ethnic and social groups[21]. Those issues are the subject of the International Criminal Court investigation [22]

Due to gross violation the human rights Ukraine filed an application to the European Court of Human Rights[23]. Russian government refused to execute the demand of the ECtHR and the order of ICJ to immediately suspend the military operations that it commenced on 24 February 2022.[24] UN General Assembly in its resolution ES-11/1 on 2 March 2022 recognized that the military operations of Russia inside the sovereign territory of Ukraine are on a scale that the international community has not seen in Europe in decades[25][26][27][28].

After 2023 more new was crimes were committed by the Russian troops, including destruction objects of civil infrastructure, forests, dams and other melioration systems by mines explosions, missiles and artillery. Russian forces destroy and loot the technical equipment of Ukrainian forestry and melioration management and of national parks in Kherson and Zaporizhzhya regions en masse[29].

Such changes also include an indirect impact through Russian attacks on Ukrainian nuclear power facilities, such as the Zaporizhzhia NPP, located on Kakhovka water store. In 2022 and 2023 Russian troops made ongoing provocations with North Crimean Canal[30][31][32][33][34][35][36][37].

Since the level of hostilities in Ukraine is unprecedented for modern humanity and has no clear prospect of minimization in the coming months, the above risks and challenges have a strong and direct impact on the issue of climate changes[38].

---

[12] https://www.icj-cij.org/en/case/182
[13] https://sofrep.com/news/russian-soldiers-gang-raped-ukrainian-woman-as-her-child-was-crying-in-the-next-room/
[14] https://www.icj-cij.org/public/files/case-related/182/182-20220307-PRE-01-00-EN.pdf
[15] https://www.bbc.com/ukrainian/features-60888528
[16] https://hromadske.radio/en/news/2022/03/09/members-of-the-wagner-group-have-been-killed-in-ukraine
[17] https://www.bbc.com/news/world-europe-60547807
[18] https://news.un.org/en/story/2022/03/1113652
[19] https://www.hrw.org/news/2022/04/03/ukraine-apparent-war-crimes-russia-controlled-areas
[20] https://www.ohchr.org/sites/default/files/documents/issues/climatechange/cfi-hrc-53-session/submissions/2022-11-28/Association-of-Reintegration-of-Crimea.pdf
[21] https://www.washingtonpost.com/world/interactive/2022/ukraine-before-after-destruction-photos/
[22] https://www.icc-cpi.int/ukraine
[23] https://hudoc.echr.coe.int/eng-press?i=003-7282553-9922068
[24] https://www.icj-cij.org/public/files/case-related/182/182-20220316-ORD-01-00-EN.pdf
[25] https://digitallibrary.un.org/record/3959039?ln=ru
[26] https://digitallibrary.un.org/record/3966630?ln=en
[27] https://hromadske.radio/en/news/2022/03/09/members-of-the-wagner-group-have-been-killed-in-ukraine
[28] https://www.bbc.com/news/world-europe-60547807
[29] https://www.ohchr.org/sites/default/files/documents/issues/climatechange/food/submissions/csos/submission-climate-change-food-association-reintegration-crimea.pdf
[30] https://arcrimea.org/en/news/2023/06/01/crimea-kremlin-dictator-and-corrupted-assistant/
[31] https://arcrimea.org/en/news/2023/05/08/donetsk-roots-and-kyiv-cake-of-crimean-rice/
[32] https://arcrimea.org/en/news/2023/03/25/collaborators-of-sevastopol-and-melitopol-sang-on-background-of-water-crisis/
[33] https://arcrimea.org/en/news/2023/03/23/traders-of-stolen-water-and-drying-crimean-villages/
[34] https://arcrimea.org/en/analytics/2023/03/20/occupied-crimea-and-russian-aggressions-anniversaries/
[35] https://arcrimea.org/en/news/2023/02/26/fantastic-bypass-channels-from-criminal-head-of-crimea/
[36] https://arcrimea.org/en/news/2022/12/15/land-amelioration-and-storm-in-glass-of-occupiers-special-services/
[37] https://arcrimea.org/en/news/2023/01/27/delusions-of-sriminal-gautleiter-refugee-about-north-crimean-canal/
[38] https://www.ohchr.org/sites/default/files/documents/issues/toxicwastes/cfis/detoxdecarb/submission-detoxification-of-climate-solutions-ngo-arc.pdf

From the point of view of international law, such Russia's illegal acts can be considered as terrorism[39] as Russian forces conjunct the attacks on ecologic objects with politic demands[40].

Ukraine started some criminal proceedings regarding issues of destruction the ecosystem by Russian troops, with qualification of such activities as ecocide crime[41], but the whole concept of ecocide crime is not too develop in modern international law and have no conventional protection[42]. New challenges for the issue of sustainable development, including growth of poverty were caused by destruction the dam of Kakhovka Hydroelectric Power Plant (HPP) on Dnipro River by Russian military units, which happened on 6 June, 2023[43][44][45][46][47].

Ukraine informed International Criminal Court about the destruction of Kakhovka HPP and representatives of Prosecutors' Office of ICC visited disaster area on June, 10, 2023. Also on June 10, 2023 the Ukrainian Parliament has adopted a resolution on an appeal to the UN, parliaments and governments of its member states, international organizations and their parliamentary assemblies in connection with the Russians blowing up the Kakhovka HPP[48]. UN OCHA stressed on June 10 that the catastrophic effects of the flooding that followed the Kakhovka Dam destruction add to the immense human suffering caused by Russia's war on Ukraine[49][50][51][52].

As ARC experts noted, the aggressor's undermining of the Kakhovka HPP became a separate crime of genocide, including the forced deportation of the population of the villages and cities adjacent to the Dnipro in the left-bank Kherson region, the destruction of their houses and the murder of those who cannot escape flooding[53]. From the point of view of international law, such Russia's illegal acts can be considered as terrorism also[54][55][56]. Destruction of Kakhovka HPP by Russian invaders caused collapse of agriculture on areas of Kherson Region, located at Dnipro River left bank, where Ukrainian authorities organized the melioration system for many decades.

On February 2025, the Russia-controlled "media" published rather characteristic semi-confessions of the Sevastopol collaborator, former Corresponding Member of the National Academy of Sciences of Ukraine Dr. Sergei Konovalov, who has been declared by the occupiers as the "director" of the "Marine Hydrophysical Institute of the Russian Academy of Sciences" since 2016.

This figure, a year and a half after the disaster, stated that after the explosion of the Kakhovka HPP "a huge volume of water that broke through the dam rushed rapidly downstream of the Dnieper and was dumped into the northern part of the Black Sea shelf. This led to an environmental disaster, since the bottom sediments of the Kakhovka reservoir and the lower

---

[39] https://casebook.icrc.org/case-study/icty-prosecutor-v-galic
[40] https://arcrimea.org/en/analytics/2022/11/05/sevastopols-maritime-cotton-and-terrorist-states-blaming-through-victim/
[41] https://www.ohchr.org/sites/default/files/documents/hrbodies/crc/gcomments/gc26/2023/cs/GC26-CS-association-reintegration-crimea-2023-02-15.doc
[42] https://www.internationalcrimesdatabase.org/upload/documents/20221024T110657-Prosecution%20for%20Ecocide%20as%20a%20weapon%20in%20armed%20conflict%20reflections%20on%20Crimea.pdf
[43] https://www.pravda.com.ua/eng/news/2023/06/6/7405479/
[44] https://www.nytimes.com/2023/06/09/world/europe/ukraine-dam-collapse-explosion.html
[45] https://www.jordskjelv.no/meldinger/seismic-signals-recorded-from-an-explosion-at-the-kakhovka-dam-in-ukraine
[46] https://www.president.gov.ua/en/news/stvorena-rosijskimi-teroristami-katastrofa-na-kahovskij-ges-83449
[47] https://en.ecoaction.org.ua/destruction-of-the-kakhovka-hpp-preliminary-conclusions.html
[48] https://itd.rada.gov.ua/billInfo/Bills/Card/42091
[49] https://twitter.com/OCHA_Ukraine/status/1667531704364331010
[50] https://news.un.org/en/story/2023/06/1137497
[51] https://web.archive.org/web/20230619214026/https://www.parismou.org/system/files/202%20-%20ARC_Submission_IMO_ILO_FAO_11_06_2023.pdf
[52] https://arcrimea.org/en/activity/2023/06/20/paris-mou-informed-member-states-about-russias-undermining-kakhovka-hpp/
[53] https://arcrimea.org/en/news/2023/06/11/gondoliers-of-fortune-and-aggressors-genocide-of-left-bank-population/
[54] https://casebook.icrc.org/case-study/icty-prosecutor-v-galic
[55] https://arcrimea.org/en/analytics/2022/11/05/sevastopols-maritime-cotton-and-terrorist-states-blaming-through-victim/
[56] https://www.internationalcrimesdatabase.org/upload/documents/20221024T110657-Prosecution%20for%20Ecocide%20as%20a%20weapon%20in%20armed%20conflict%20reflections%20on%20Crimea.pdf

reaches of the Dnieper contained many harmful impurities – from radioactive isotopes left over from the Chernobyl accident to heavy metals and toxic substances used in industry and agriculture." Konovalov also admitted that "even if the water flow did not contain pollutants, its impact on the marine ecosystem could still be negative due to abrupt changes in the salt balance."[57]

Also the above-pointed issues were discussed during the side-events on Sharm-el-Sheikh Climate Change Conference (COP 27), Dubai Climate Change Conference (COP 28) and Baku Climate Change Conference (COP 29) held by our experts together with Crimean Tatar Resource Center and Mission of Ukraine in 2022 and 2023[5859606162], also as at World Law Congress, 2023[636465].

Experts stressed on COP 27, COP 28 & COP 29 that the main negative consequences for the indigenous peoples of the Crimea, are the destruction or damage due to climatic changes of natural ecosystems and areas of traditional farming, namely: the desertification of the Western Crimea, the deforestation of the Crimean mountains, soil salinization of the Central and Eastern Crimea. All this negative consequences make negative impact on the social and humanitarian potential of region, including the right to water[66].

After it in World Water Day, 2024, Russian military made missile strike on Dnipro HPP on Dnipro River, Zaporizhzhya city trying to destroy Dniprohes Dam and make new disaster with flood and water sources lost. Upon request of ICC's Prosecutors' Office our Association stressed in March, 2024 that relevant conventional disputes and activities in the area of international environmental law in conflict situations must be taken into consideration[67].

On example of Kakhovka Dam case we stressed that an all-enhancing work on the development of the concept of ecocide as a fourth core international crime should be continued, and it must take into account national legislation, law-enforcement practices and jurisprudence. Ukraine and some other European states have formed relevant practices in recent years. We pointed that international ecological crimes present a principally new phenomenon for victims of criminal acts, including issues like damage recovery, special challenge to collective rights of territorial communities and indigenous peoples most affected by such crimes.

On example of Kakhovka Dam case we stressed to ICC's Prosecutors' Office that the victim-centered approach is especially crucial taking into account the possible and probable correlation between genocide and eventual international ecologic crimes, including ecocide. Here, genocide may take a form of deliberately inflicting on a national, ethnical, racial or religious group conditions of life calculated to bring about its physical destruction in whole or in part. The deliberate destruction of the Nova Kakhovka Dam by the Russian forces in 2022 is an example of a war crime with such genocidal implications and also is an ecocidal act.

More, it seems to be that negative climate changes are not the side effect of Russian aggression against Ukraine, but it is one of its major goals. As it is known the administration of Russian president use the narratives that the global warming and ocean level rise are allegedly useful for Russia as such situation will allegedly allow to develop actively the natural resources of Russia-controlled northern part of Eurasia. So damage connected with climate changes, caused by Russian aggression, including attacks against dam system on Dnipro River is

[57] https://arcrimea.org/en/news/2025/02/16/crimean-collaborators-admitted-that-kakhovka-hpp-explosion-caused-ecological-catastrophe/
[58] https://arcrimea.org/en/analytics/2023/07/08/qualification-of-russian-aggression-ecologic-challenges/
[59] https://arcrimea.org/en/analytics/2023/03/24/world-law-congress-occupied-crimea-and-russian-aggression/
[60] https://arcrimea.org/en/activity/2022/11/20/crimea-indigenous-peoples-international-crimes-and-global-warming/
[61] https://arcrimea.org/en/activity/2023/12/04/deoccupation-of-crimea-was-discussed-in-ukrainian-pavilion-of-un-climate-conference/
[62] https://arcrimea.org/en/activity/2023/12/03/un-climate-change-conference-and-de-occupation-of-crimea/
[63] https://arcrimea.org/en/activity/2023/07/21/world-law-congress-russian-aggression-energy-markets-and-maritime-safety/
[64] https://arcrimea.org/en/news/2023/07/23/crimean-issues-on-the-world-law-congress/
[65] https://arcrimea.org/en/activity/2024/02/17/un-climate-conference-and-russian-aggression/
[66] https://arcrimea.org/en/news/2024/02/25/kerch-youth-under-sun-of-russian-occupation/
[67] https://pca-cpa.org/en/cases/149/

committed by Russia-controlled structures with direct intent.

Relevant activities of UN bodies, in the context of the human right to safe drinking water and sanitation will allow intergovernmental bodies, governments of developing countries, environmental protection and human rights organizations, and institutions of the world's indigenous peoples to start a discussion and assessment of the forms of direct and indirect negative ecological and economic impact of Russian aggression in the field of sustainable development and the related rights to food, water and sanitation[6869], and regarding the related compensations for damage and losses in real economic sector.

So we call Special Rapporteur, also as all UN authorized bodies and agencies, to pay a special attention to Russia's illegal activities in Ukraine, including Russian aggression, war crimes and state terrorism, in framework of global risks for climate and relevant global human rights and sustainable development, including right to food, water and sanitation.

27th February, 2025 Representative of the ARC

Dr. Borys Babin



[68] https://arcrimea.org/en/analytics/2023/07/08/qualification-of-russian-aggression-ecologic-challenges/

[69] https://arcrimea.org/en/analytics/2023/06/13/environmental-challenges-of-occupation-of-crimea-and-other-forms-of-russian-aggression/