

World Heritage Watch Report 2018



World Heritage Watch

**World Heritage Watch
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Landesstelle für
Entwicklungs-
zusammenarbeit

Senatsverwaltung
für Wirtschaft, Energie
und Betriebe



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Preface

World Heritage Watch offers a platform for civil society actors and indigenous peoples to document concerns, to alert the World Heritage Committee, and to inform the wider interested public. Since last year we publish our World Heritage Watch Report before the annual World Heritage Committee Meeting, in order to contribute to the Committee's decision-making in a timely fashion. This is a demanding routine as the time to prepare the Report is very limited: between 1 February, when most State of Conservation Reports by State Parties are submitted to the WH Centre, and mid-May, when the Draft Decisions are finalized for the upcoming Committee Meeting.

We recognize that this useful, yet tight annual routine puts considerable strain on our network members, who must send us their reports in time. Many of them are located in remote locations with only intermittent internet connection; others are not very well versed in legal English or French language. They have to track and check the facts and statements in the State of Conservation Reports, and to compile and select information which is relevant for the Committee. This represents a huge learning process for all of us.

This year we are glad to report about no less than 39 sites, more than ever before. We have made a special effort to include reports on sites which are expected to be on this year's agenda, either because they are on the List of WH in Danger, or their State of Conservation Reports will be discussed, or because they are nominated for inscription on the World Heritage List. Half of our reports (19 of our 39) meet this requirement.

As many as 17 sites in the Report have not been covered by World Heritage Watch before, and it goes without saying that we are extremely happy that NGOs, indigenous peoples and activists from these sites have joined our network.

Three sites covered in the Report haven't been inscribed yet: Prosecco, Roşia Montana and Podesennya, all three of them cultural landscapes: Here World Heritage inscription could be a determining factor regarding the path of development these regions will take: sustainable development with a strong emphasis on protecting cultural and natural heritage, or maximum resource exploitation and a boom-and-bust path which brings a short-term gain at the expense of long-term well-being.

Many of the cases presented here - may we only mention Upper Svaneti and L'viv but also Carthage and Sukur - raise the question of financing urgent interventions which the sites need. This is an issue not only for conservation but as much for development and, ultimately social stability, security and peace.

Since its inception, World Heritage Watch has insisted that safeguarding World Heritage Sites must include not only conservation of heritage but also tasks such as vocational training and education, infrastructure and business development, tourism regulation and spatial planning of the site as a whole. These are all classical fields of development assistance. We urge major development donors to bring their expertise and resources to bear on World Heritage sites.

There are also sites in our Report which are not on this year's agenda. They appear to have escaped UNESCO's attention for a long time: L'viv and Upper Svaneti. From these sites we received reports of situations of great urgency. We hope that our reports will motivate UNESCO to take a closer look at them and to enlist steps to address the problems they are facing.

At other sites, such as Germany's Upper Middle Rhine Valley, the Natural and Cultural-Historical Region of Kotor, and the Shalamar Gardens and Fort of Lahore, we witness ongoing destruction which call for the Committee's resolute intervention in the face of cover-up reports and denial by State Parties. To save them from further loss of their heritage values, these sites should all be on this year's agenda of the Committee.

The most urgent case, however, is the World Heritage site of Diyarbakir in southeast Turkey. Since our first conference in Bonn 2015, World Heritage Watch has spared no effort to alert the World Heritage Committee to the urgent situation of a town which is simply being razed to the ground by the State Party. In two consecutive reports World Heritage Watch has provided detailed facts and photographic documentation about the continuing destruction and gross human rights violations, and we have brought mayors, site managers and NGO representatives to both our Forum and the World Heritage Committee Session, providing an opportunity for the Committee to obtain first-hand information from a site which has been inaccessible to UNESCO missions for more than two years. Diyarbakir is again subject of our Report this year, and we can only hope that the Committee will now be responsive to this case of deliberate destruction.

Another First are two thematic contributions at the very beginning of the Report. While we usually focus on site-specific contributions, we have made an exception: climate change is becoming a pervasive issue at World Heritage Sites, creating a wide array of problems which are often hard to tackle. A closer look at our reports reveals that the problems at many World Heritage sites are directly or indirectly associated with climate issues, with energy resource and electricity production playing a role in no less than six cases.

Taken all together, we feel that this year's World Heritage Watch Report is highly relevant, and we hope that we can report on even more sites next time.

Our first and foremost thanks go to all those across the globe who have written contributions for this Report, and we hope that they will feel that it was worth the effort. We are extremely grateful to our donor for the second consecutive year, Berlin's Landesstelle für Entwicklungszusammenarbeit (Agency for Development Cooperation of the Land Berlin) without whose support it would not have been possible to produce this volume. Finally, we express our sincere gratitude to the volunteers who helped edit this volume in the shortness of time, and to Martin Lenk for his producing many of the maps which so much help to understand the sites.

By their very nature, World Heritage Watch Reports are never easy reading. We hope they provide readers with a deeper understanding of the challenges of safeguarding World Heritage Sites, and hence, a better understanding of the solutions needed to overcome them.

Berlin, May 2018

Maritta Koch-Weser, President

Stephan Doempke, Chairman of the Board

I. Climate Change

A Comprehensive Policy Response to Climate Change Vulnerability in World Heritage Sites

Adam Markham, Union of Concerned Scientists



Climate change is now probably the fastest growing global threat to World Heritage sites, and by extension, to natural and cultural heritage worldwide. This is confirmed by several recent reports, including – *World Heritage and Tourism in a Changing Climate* (UNESCO) and *World Heritage Outlook 2* (IUCN).

Recognizing this fact, Decision 40 COM 7 of the World Heritage Committee recommended that “...the World Heritage Centre strengthen its relations with other organizations working on Climate Change, particularly with the UNFCCC and the Intergovernmental Panel on Climate Change (IPCC) secretariats, and specifically with regard to the effect of Climate Change on World Heritage properties. Then in Krakow in 2017, in Decision 41 COM 7, the Committee further noted “the reported serious impacts from coral bleaching that have affected World Heritage properties in 2016-17 and that the majority of World Heritage Coral Reefs are expected to be seriously impacted by Climate Change” and asked that efforts be taken to “strengthen all efforts to build resilience of World Heritage properties to Climate Change, including by further reducing to the greatest extent possible all other pressures and threats, and by developing and implementing climate adaptation strategies for properties at risk of Climate Change impacts.” The decision also requested a much needed update to the 2007 “Policy Document on the Impacts of Climate Change on World Heritage Properties”.

To date, however, for the vast majority of World Heritage sites, there have been no climate vulnerability assessments undertaken, there is no climate impact monitoring in place, and little or no adaptation planning has occurred. Additionally, a remarkably small number of State of Conservation (SOC) reports deal in any significant way with climate change risk and threats – even at sites where scientifically robust impact assessments have occurred.

Growing Climate Threat to World Heritage Sites

Unequivocal scientific evidence shows that concentrations of the main greenhouse gas, carbon dioxide, in the atmosphere are greater now than at any time in the past 800 000 years

and that global temperatures have increased by 1°C since 1880. According to the Intergovernmental Panel on Climate Change (IPCC), some recent changes, including warming of the oceans and atmosphere, rising sea levels and diminished snow and ice, are unprecedented over decades to millennia. There is an extraordinarily wide variety of ways in which climate change is already impacting World Heritage sites, potentially threatening their outstanding universal value (OUV), integrity and authenticity, as well as the economies and communities that depend on them. These include warmer temperatures, melting ice, reduced snow cover, thawing permafrost, increased extreme weather events (including floods, droughts and heatwaves), worsening wildfires, changing humidity, rising seas, ocean acidification, coastal inundation and erosion. Climate change is a threat multiplier, and will increase vulnerability and exacerbate other stresses including, but not limited to, pollution, conflict over resources, urbanization, habitat fragmentation, loss of intangible cultural heritage and the impacts of unplanned or poorly managed tourism.

Across most ecosystems, there is potential for some species to move and shift their ranges in response to climate change in natural World Heritage sites. Many ecosystems exhibit a degree of climate resilience, but adaptive capacity is reduced by other stresses including habitat loss, degradation and fragmentation. The speed of climate change and lack of habitat connectivity will severely limit ecosystem response in many cases, and will require the adoption of new and innovative conservation and site management practices. Protecting large intact ecosystems is the most effective way of maintaining the adaptive capacity of natural World Heritage sites.

The monuments, buildings and archaeological treasures of cultural World Heritage sites, however, usually cannot move and are therefore inextricably tied to locality, place and living cultural practices and traditions (Australia ICOMOS 2013). Cultural resources lose part of their significance and meaning if moved and, once lost, they are gone forever.

Selected examples of climate vulnerability and risk to World Heritage sites:

Lake Malawi National Park, Malawi – 40 COM 7B.81

Lake Malawi is one of the world's deepest freshwater bodies, Lake Malawi National Park is a biodiversity hot spot. The lake has the world's greatest diversity of freshwater fish with over 1000 species, more than 350 of which are endemic cichlids. The fish and ecosystems of Lake Malawi are increasingly at risk from a combination of climate change, human population pressure and deforestation. Lake levels have dropped rapidly in recent years, in part due to increased temperatures causing more evaporation. Rainfall is becoming less reliable, dry periods longer and precipitation events more extreme. Water resources for agriculture and energy production are also at risk.

Ruins of Kilwa Kisiwani and Ruins of Songo Namara, Tanzania – 40 COM 7B.20

The ruins of these two island sites in the south of the country have been recognized for the port cities' role in the growth of Swahili culture, Indian Ocean commerce from mediaeval times, and the arrival of Islam in East Africa. Kilwa Kisiwani was a thriving center from the 9th to 19th centuries AD. Its ruins, many of which remain unexcavated, are largely built of coral and limestone mortar. Coastal flooding and erosion are major threats to Kilwa Kisiwani as sea levels rise due to climate change and the city's vulnerability to damaging storm surges grows.

Wadi Rum Protected Area, Jordan – 40 COM 7B.65

Wadi Rum was listed as a World Heritage site for both natural and cultural values. The 30 000-hectare site contains more than 45 000 rock carvings and inscriptions dating back 12 000 years, helping to illuminate the evolution of pastoral societies and the development of the alphabet. Wadi Rum is an important refuge for desert wildlife, and many of its plants are important sources of food, forage and medicines for the Bedouin people. More than 300 000 tourists visiting this remote area annually are taking their toll. Climate change is expected to exacerbate problems in the coming decades. Warmer and drier conditions, with more extreme weather including drought, will increase water stress. Changing climatic conditions are also likely to threaten species dependent on Wadi Rum's high mountain habitats.

Sagarmatha National Park, Nepal – 40 COM 7B.89

Encompassing the highest point on Earth, Sagarmatha National Park is listed as a World Heritage site for the exceptional natural beauty of its landscapes of mountains, glaciers and deep valleys. Sagarmatha is home to a Sherpa culture that

blends traditional agricultural practices with a deep reverence for nature. One third of the people on Earth depend on water that flows from the Himalayas, including from Sagarmatha. This water resource is now being jeopardized, however, as warming temperatures and changes in precipitation are causing Himalayan glaciers to retreat and altering patterns of water run-off. A loss of glaciers can also destabilize surrounding slopes, resulting in catastrophic landslides, and excessive meltwater can cause glacial lake outbreaks or flash floods and erosion. If snow and ice accumulation does not match accelerated glacial melting, water shortages will affect millions of people downstream in the future.

Rice Terraces of the Philippine Cordilleras, Philippines – 40 COM 7B.45

The indigenous Ifugao people of the Philippine Cordilleras have built and developed their rice terraces over a period of at least 2,000 years. This important cultural landscape is highly sensitive to climate change and is already suffering negative effects. Warming temperatures and increases in extreme rainfall events are major problems. More intense rainstorms will increase the instability of the rice terraces built on steep mountain slopes, and cause landslides and erosion. An additional problem is that local rice varieties developed over hundreds of years under stable climatic conditions by the Ifugao are less adaptable to rapid climate change than modern rice strains. Climate change comes on top of cultural perturbations that include the abandonment of rural tradition by young people who are increasingly moving to urban areas.

East Rennell, Solomon Islands – 40 Com 7A.49; 41 COM 7A.19

The East Rennell World Heritage site comprises 37,000 hectares at the south of Rennell Island, the southernmost of the Solomon Islands in the Western Pacific, and the largest raised coral atoll in the world. About 1,200 people live in four villages within the property's boundaries, and East Rennell was the first World Heritage site to be inscribed with responsibility for its management lying with the traditional and customary owners. The integrity of the site is now under threat from commercial logging, the introduction of alien species, and climate change. Sea level rise is directly affecting Lake Tegano, raising its water levels and salinity. As a result, coconut and taro crops, vital food staples for the local communities, have been significantly reduced, and houses and the school have been flooded.

Coro and its Port, Venezuela – 41 COM 7A.27

Coro and its port, La Vela, are unique on the Caribbean coast for the use of unfired earth to build structures including churches, civic buildings and homes. Coro was put on the List of World Heritage in Danger in 2005 as a result of significant damage caused by unusually intense rain and storms in 2004

and 2005. The Central America and Caribbean region has been identified as one of the areas of the tropics most responsive to climate change, and has experienced a marked increase in extreme weather events including droughts, storms and floods over the last 30 years. Increased intensity of periodic rainstorms presents the primary threat to the historic buildings of Coro and La Vela, causing roof leaks, erosion of mud-roof mortar, structural cracking, damp walls, wall collapses and landslides. Major strides in addressing these problems have recently been made but Coro currently remains on the World Heritage in Danger list.

Recommendations for a World Heritage response to climate change, and revision of the Policy Document on Climate

This overview and the few snapshots offered on the vulnerability of sites clearly demonstrates the urgent need to understand, monitor and respond better to climate change threats to World Heritage sites. Actions which would help to achieve this, and should be taken into consideration in the overhaul of the Policy Document on Climate Change (41 COM 7.25), include:

- Take urgent steps to address the risks and impacts of climate change on World Heritage, including the unique, global threat of deterioration to or loss of Outstanding Universal Value (OUV), integrity and/or authenticity for which properties were inscribed on the World Heritage List;
- Identify those World Heritage sites most vulnerable to climate change and strengthen systems for continued assessment, monitoring and early warning of impacts;
- Foster climate change vulnerability assessments of sites as part of the nomination process;
- Recognise the potential for sites and the values they carry, to strengthen communities' adaptive capacities and strategies for mitigation and resilience to multiple threats;
- Recognise the potential for sites to act as living laboratories, platforms for research, for monitoring change, linking policy and practice and fostering understanding of the need for climate action;
- To strengthen resilience to climate change, increase the inclusion of wilderness areas on the World Heritage List and ensure connectivity between sites;
- Urgently address the issue of inadequate resourcing for WH site management and climate adaptation;
- Include cultural heritage in climate impact assessments and policy responses at all levels;
- Fully incorporate the latest climate science into World Heritage site management planning;
- Ensure that indigenous peoples and local communities are fully involved at all stages of climate response planning & implementation.

Harmonizing World Heritage and Climate Measures. The Case of Lake Baikal

Sergey Shapkhaev, Buriat Regional Union for Baikal, and
Eugene Simonov, Rivers without Boundaries Coalition



„Climate Measures“ vs Natural Values - conventions lack coordination

The OUVs of World Heritage sites are affected and threatened by many climate-related threats: floods, droughts, hurricanes, etc. However, it is often overlooked that haphazard human activities allegedly directed towards mitigation and adaptation to climate change also may present a threat to natural heritage. A lack of coordination between different environmental objectives results in proposing projects for technological solutions in climate change mitigation which may severely compromise the values of World Heritage sites. World Heritage is not alone suffering from this phenomenon. The Convention on Migratory Species had to propose special measures to harmonize mainstreaming of „climate friendly“ renewable energy (wind, hydro, etc.) and requirements for the protection of migratory species.

Threats to natural ecosystems from poorly planned dams, windmills, biofuel burners and solar farms, as well as supporting long-distance transmission grids, became especially obvious after the nations who signed the Paris Agreement revealed their Nationally Determined Contributions (NDCs), some of which include projects and programs presenting potential threats to World Heritage and candidate sites. Civil Society has an important role in highlighting these contradictions and making governments and convention secretariats undertake efforts for removing particular threats and harmonizing overall policies. Without the involvement of concerned citizens, bureaucracies and business alike are likely to use „climate change rhetoric“ to advance large infrastructure and energy projects and have too many incentives to overlook threats those projects present to natural ecosystems.

„Green Water Infrastructure“ also threatens the climate system

Most of us have heard about so-called 'climate refugees'. Assuming the same growth rates of anthropogenic greenhouse gas (GHG) emissions, their numbers in the EU countries may increase to an extent that makes today's migration flows look pale in comparison. But in fact, the first 'climate refugees' appeared during the last century, long before this term entered

academic and political parlance, in countries where giant dams and hydroelectric power plants (HPPs) were built on major rivers: the USSR, the US, Brazil, China, and others. Flooding fertile lands in river valleys for hydropower reservoirs resulted in involuntary mass resettlement of local populations. In the 1970s, more than 300 communities with a combined population of 101,500 had to be relocated from an area of 7,600 square kilometers to make way for the hydropower reservoirs on the Angara River (one of which expanded Lake Baikal by 500 square kilometers due to the erection of the Irkutskaya Hydro dam)¹.

River runoff magnitude and variability are as important climate indicators as the concentration of various atmospheric gases. Rivers and lakes are part of the hydrosphere, which, according to Article 1 of the UN Framework Convention on Climate Change (UNFCCC), is an integral part of the climate system. Most dam-based HPPs heavily affect and distort natural river runoff fluctuations, producing an impact on the hydrosphere surpassing or comparable in scale to similar effects expected as a result of anthropogenic GHG emissions.

In addition, water from reservoirs is often diverted, sometimes in large quantities, for industrial and agricultural uses, causing degradation of natural ecosystems below dams and triggering disputes between states located upstream and downstream of the reservoir.

Many World Heritage sites are threatened by hydropower projects and other water infrastructure. For example, Lake Turkana (Kenya) and Lake Baikal (Russia) are both threatened by hydrological changes due to the construction of large hydropower listed in countries' NDCs. „Landscapes of Dauria“ (Mongolia and Russia) is threatened by a proposal for interbasin water diversion from Onon to Ulz river framed as „climate adaptation“ measure.

Threats and their sources

Lake Baikal has been regulated by the Angara Hydropower Cascade since 1960, long before it was listed as a World

¹ Ivanov I.N. Hydropower resources of the Angara River and the natural environment. Novosibirsk: Science. Siberian Branch, 1991

Heritage in the 1990s. In the 21st century it was additionally threatened by dams planned in the Selenge River basin in Mongolia. We will focus on some aspects of the environmental campaign largely driven by Mongolian and Russian NGOs related specifically to climate threats and world heritage site management.

Over the past 20 years, areas in the Lake Baikal Basin in Mongolia and Russia experienced low water inflow due to scarce precipitation, particularly in the last three years in which summer droughts caused a decreased flow from the Selenge River (contributing 50% of the inflow to Baikal), and a subsequent drop in Lake Baikal's water level. Many rural communities around Lake Baikal also experienced shortages of quality drinking water due to dropping water levels in ordinary and artesian wells, and a decrease in fisheries due to shrinking spawning grounds. Therefore, most local people perceived the climate threat as real and affecting their wellbeing and livelihoods. However, older residents still remember catastrophic floods which used to occur every 20 to 30 years, with high-water inflows caused by monsoons from the Pacific Ocean hitting Mongolia. The next cycle of floods was expected by 2015, but instead the drought exacerbated.

In this context, the Mongolian government's plans to construct dam-based HPPs on the Selenge and its tributaries to support energy and mining industries caused a mixed response in both Mongolia and Russia. This necessitated an independent assessment of potential environmental effects of dams, with a subsequent publication of findings. Mongolia's mining and energy industry representatives, however, referred to the country's commitments under the Paris Agreement as an overriding priority and tried to deny the necessity for international assessment. They insisted that coal-fired power generation needed to be complemented by renewable hydroelectricity to allow Mongolia to reduce its anthropogenic GHG emissions in accordance with the country's international obligations.

In contrast, Mongolian environmentalists and agricultural producers referred to other international agreements, such as the UN Convention Concerning the Protection of the World Cultural and Natural Heritage, the Convention on Biological Diversity, the Ramsar Convention on Wetlands, and the Bonn Convention on Migratory Species. They argued that HPP construction would also contravene the key principles of the Paris Agreement as well as Mongolia's other international environmental obligations.

To further complicate matters, in 2015 China EximBank prepared to lend a large portion of funds needed for Mongolian HPP construction, while the French *Tractebel Engineering* \ *ENGIE* Group was designing the largest HPP in the Selenga basin on the Eg River. Tractebel Engineering, however, has a dubious reputation for participating in 'dirty' projects causing UNESCO's concern — like the Gibe III Hydro in Ethiopia on

the Omo River, where a dam is causing damage to the Lake Turkana National Park in Kenya.

Various players, often acting on behalf of transnational corporations, attempted to gain access to climate finance under the pretext that dam-based HPPs are „clean“ 'green' energy blessed by the Paris Agreement. For example, En+Group (belongs to Russian-Cypriot aluminum tycoon Oleg Deripaska) claimed at its Initial Product Offer (IPO) in the London Stock Exchange in November 2017 that it produces „green aluminum brand ALLOW“ with the help of clean hydropower energy from the Angara Cascade. Inconsistencies in the interpretation of „clean energy“ in the context of the Paris Treaty remain a major challenge not only in Mongolia and Russia, but also in the wider international arena.

The role for NGOs

To respond effectively to these challenges, local NGOs engaged in a global cooperation by setting up and joining international networks, such as Rivers Without Boundaries, Friends of the Earth, and others. International NGOs acted as a bridge between local stakeholders in the two countries and large international bodies such as the World Heritage Center or the World Bank.

NGOs chose to engage in the Selenge basin dam dispute based on the relatively high environmental standards required by the World Bank whose loan supported Mongolia's HPP design. In particular, World Bank policy provides for broad participation of the concerned public, in particular women, NGOs, indigenous peoples and local communities in the area affected by the project. So a complaint was sent to the WB Inspection Panel, which helped to push for further consultations and assessments.

Another key element of success was the dialogue with the World Heritage Committee, the World Heritage Center and the Convention's Advisory Bodies. As a result, in 2015-2017 the World Heritage Committee issued helpful decisions requesting an assessment of impacts of each individual existing and planned dam, and urged the States Parties to undertake a cumulative assessment of impacts and a Strategic Environmental Assessment (SEA), including an analysis of alternatives.

Conclusions:

- The way society perceives threats can lead to ambiguous conclusions and priority-setting challenges. The role of NGOs could lie in promoting further development of civil society institutions capable of providing independent expert review that ensures the protection of World Heritage along with other universal values. Based on legally-defined procedures, these would serve as sources of sound evidence to inform society's choices and well-founded solutions.
- Ill-designed „climate mitigation and adaptation“ projects may present threats to the OUVs of World Heritage sites and require special measures to prevent them;
- Formal coordination between the World Heritage Convention, Bonn Convention, and other biodiversity conservation conventions on the one side, and the Secretariat of the UN Framework Convention on Climate Change on the other is highly advisable to harmonize their activities and ensure that adaptation and mitigation measures do not have any harmful impacts on World Heritage Sites²;
- In finalizing the methodology for countries' NDC development, clear-cut criteria should be introduced for selecting environmentally acceptable low-carbon energy sources. The appeals made by civil society actors in different countries to the UNFCCC Secretariat calling for a ban on initiatives relying on energy sources which threaten the biodiversity of ecosystems³.
- Further expert support and discussion of this issue with States Parties are required, in particular using the Non-State Actor Zone for Climate Action (NAZCA) of the Paris Agreement and platforms for sharing the lessons learned and best practices of indigenous peoples and local communities⁴.

2 Resolution Concerning World Heritage and Climate Change adopted by the 4th International NGO Forum on World Heritage at Risk. Villa Decius, Krakow, 1 July 2017

3 NGO publications http://rusecounion.ru/klimat_261115, http://rusecounion.ru/doc_int_manifest_161115, <http://www.plotina.net/cop21-from-eu-russia-csf/>, <http://www.plotina.net/cop21-10-reasons-why/>

4 Climate Change Threats and Perceptions: Choice of Priorities and Role of NGOs. Sergey Shapkhaev. 2018. [HTTP://alegal-dialogue.org/ru/climate-change-threats-perceptions-choice-priorities-role-ngos](http://alegal-dialogue.org/ru/climate-change-threats-perceptions-choice-priorities-role-ngos)

II. Natural Properties

Pirin National Park in Bulgaria – Intensification of the Threats to the Property

Petko Tzvetkov, Bulgarian Biodiversity Foundation, Katerina Rakovska and Neli Dontcheva, WWF DCP Bulgaria, Toma Belev and Zornitsa Stratieva, Association of Parks in Bulgaria, on behalf of For The Nature Coalition in Bulgaria

Pirin National Park has been a WHS since 1983 (criterion vii, viii and ix). The whole area of the site is a national park (NP), corresponding to IUCN II Category; it is also a Natura 2000 site. The Park is very well protected on paper, but Park management gives rise to serious concerns owing to the construction of the Bansko Ski Zone. It was excluded from the property in 2010 because “the Outstanding Universal Value of the property has been repeatedly and significantly impacted by the development of ski facilities and ski runs”¹ while being described as so-called buffer zones. NGOs have been in contact with the WHC since 2000 at the start of the project, with the request to include Pirin in the List of World Heritage in Danger. Such inclusion is becoming more urgent due to systematic neglect by the State Party of the decisions of the WHC, considering especially the following:

1. Management planning which is incompatible with the preservation of Pirin’s OUV

1.1. Decision of the Bulgarian Government from 29 Dec 2017 to amend the current Pirin NP management plan (MP 2004) that affects 48% of the total park territory and 47.57 % of the WH property, extending construction over three management zones of the park – zone for buildings and facilities (0.6% of the Park), zone for tourism (2.2%), and zone for conservation of forest ecosystems and recreation (45.2%). Ski runs and ski facilities are specifically mentioned for the first two zones, whose permissible share would rise five times – from 0.6% to 2.8%; at the same time, unspecified construction would be possible in 45.2% of the Park (47.57% of the WH property). No screening for the need of Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) has been undertaken (see Fig. 1).

1.2. The Draft Updated Management Plan (DUMP) of Pirin NP (2014-2023) envisages significant downgrading of

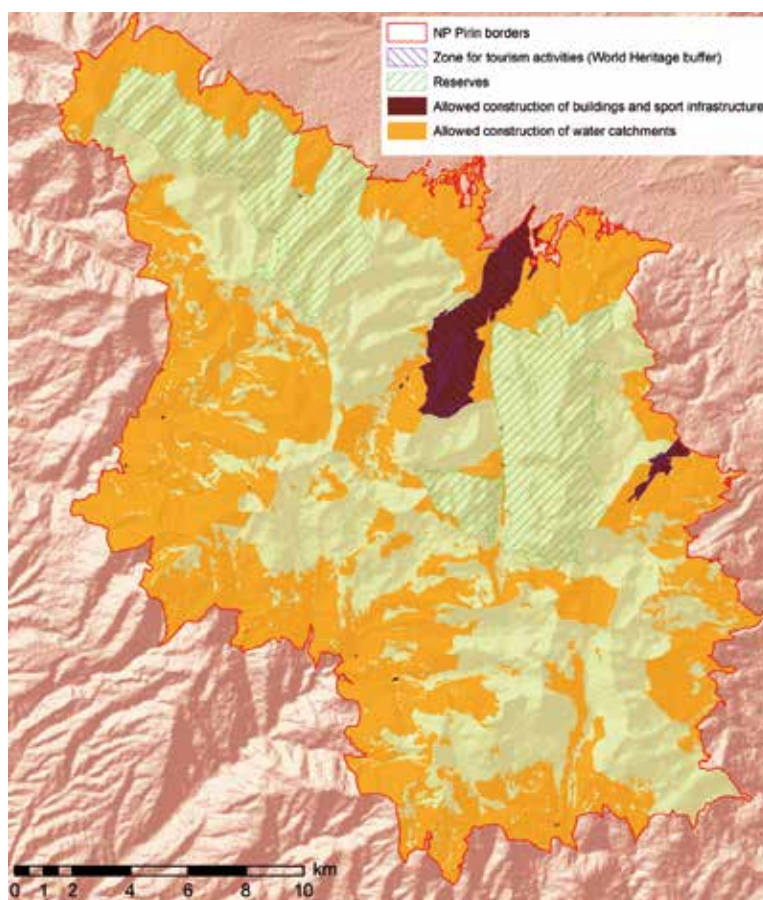


Fig. 1: Areas with allowed construction in the amended Pirin NP Management Plan 2004 in line with the government decision from 29 December 2017.

Map: For The Nature Coalition

management regimes; also, it is not being revised according to the remarks of the Bulgarian Ministry of Environment and Water (MoEW) and WHC Decision 40 COM 7B.93 from 2016. Furthermore, the draft document has not passed SEA & AA despite the proposed extension or intensification of construction, logging and grazing. Construction is allowed within three zones: 1) Zone of mountain huts, administrative centres of management, and park maintenance and sport facilities (Zone V); 2) Zone of Tourism (Zone IV); and 3) Zone of conservation of forest, high mountain, grass, lake and river ecosystems (Zone III). Together, these three zones cover a total area of 26,711 ha or 66.2% of the total Park area (increased over 100 times). Construction of buildings and sports facilities is allowed in Zones IV and V that cover an area of 3,009 ha or 7.5% of total Park territory com-

¹ <http://whc.unesco.org/archive/2010/whc10-34com-8Be.pdf>

pared to 0.6% in MP(2004) (expansion by 13 times). In Zone III, covering 58.7% of Park area, some specific types of construction e.g. mountain huts, shelters, water catchments as well as roads for fire-fighting machinery are allowed (see Fig. 2 & 3). In the provisions of DUMP 2014, 48% of all forests within Pirin NP

are envisaged for logging through maintenance and restoration activities according to technical projects. In 19% of the forests, logging is allowed in case of fire, natural disasters and calamities. Only 33% of the park is not open for logging, almost half of that area being in the reserves (see Fig. 4 & 5).

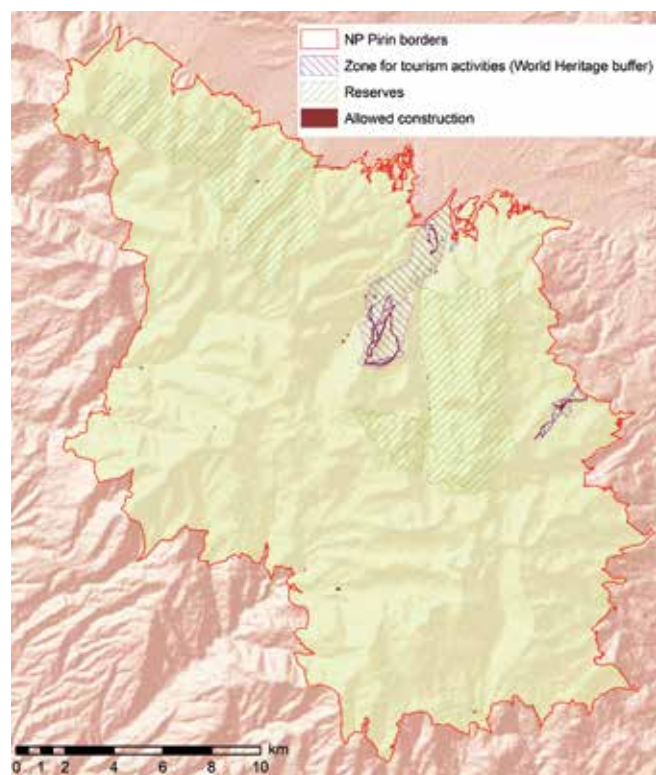


Fig. 2: Areas with allowed construction in Pirin NP under MP 2004.

Map: For The Nature Coalition

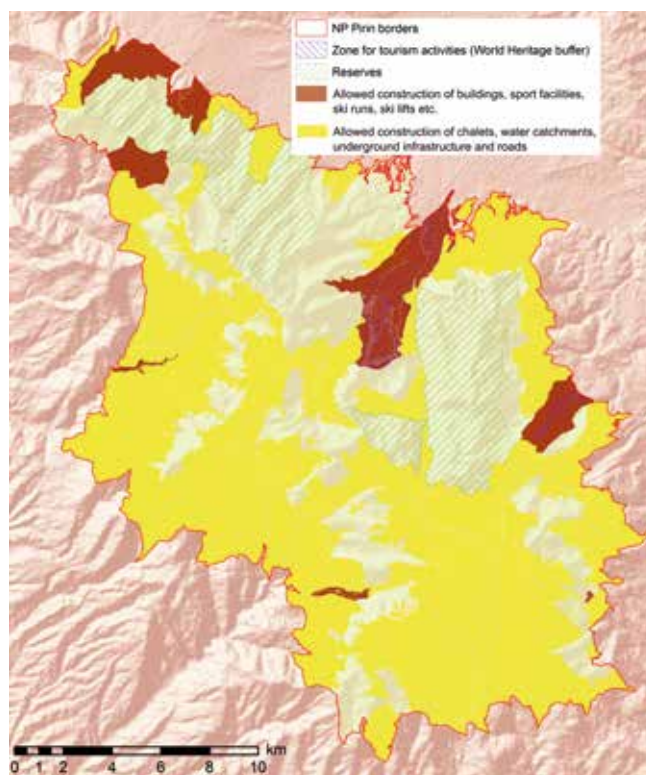


Fig. 3: Areas with allowed construction in Pirin NP under DUMP 2014.

Map: For The Nature Coalition

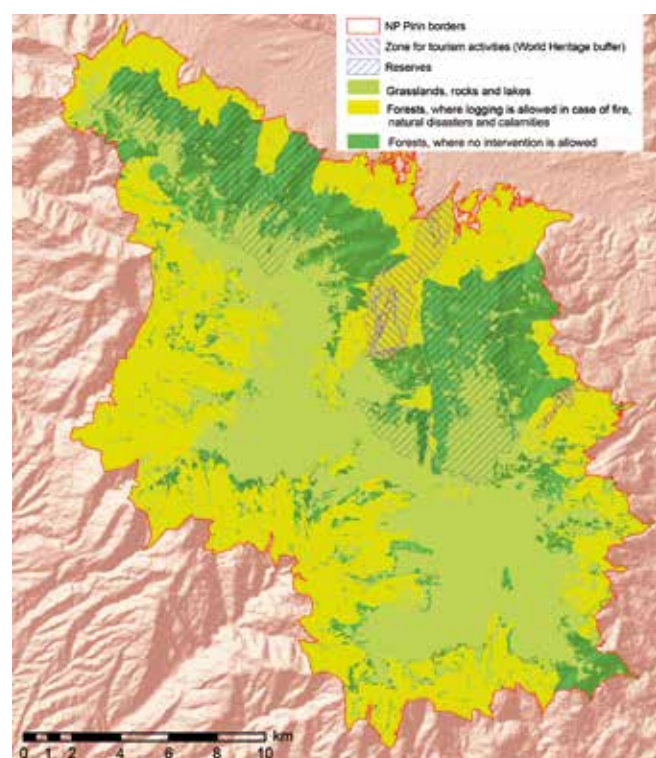


Fig. 4: Forest logging regimes in Pirin NP under MP 2004.

Map: For The Nature Coalition

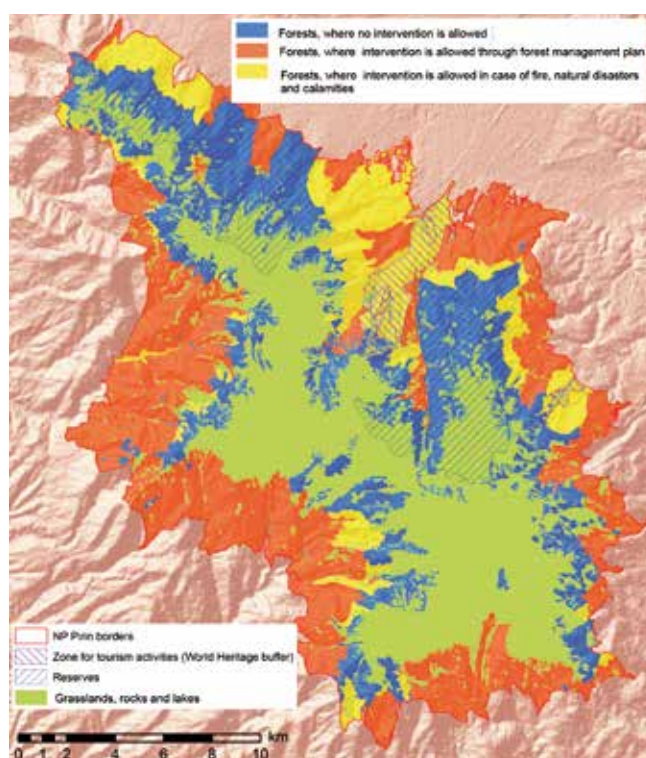


Fig. 5: Forest logging regimes in Pirin NP under DUMP 2014.

Map: For The Nature Coalition

MP 2004 designates 7,921 ha for grazing, of which 6,928 ha were being used in 2014. The DUMP 2014 envisages 10,460 ha for grazing (an increase of 25%). Also, grazing rates for cattle are increased from 0.5 livestock units/ha to 1 to 2.5 livestock units/ha (a two- to five-fold increase) and for sheep from 2.5 units/ha to 6.5 units/ha (more than two-fold increase) (see Fig. 6 & 7).

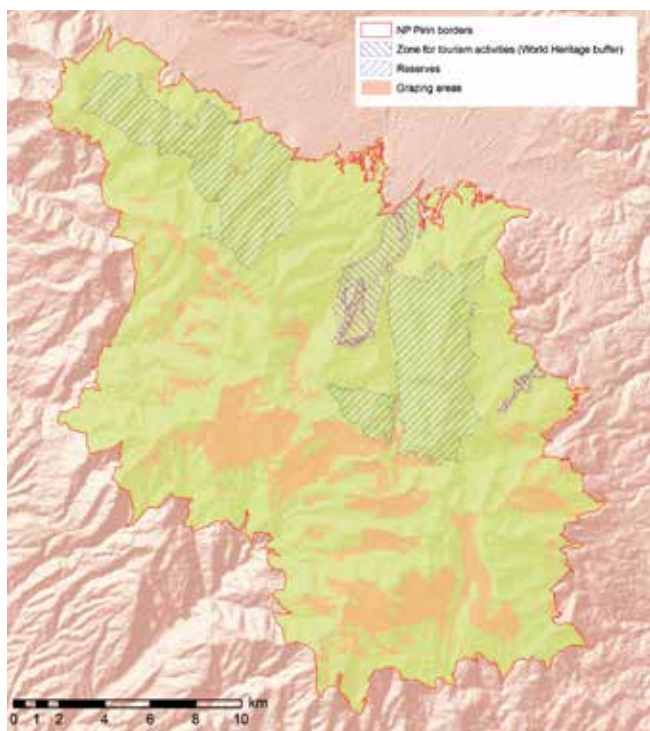


Fig. 6: Grazing regimes in Pirin NP under MP 2004.

Map: For The Nature Coalition

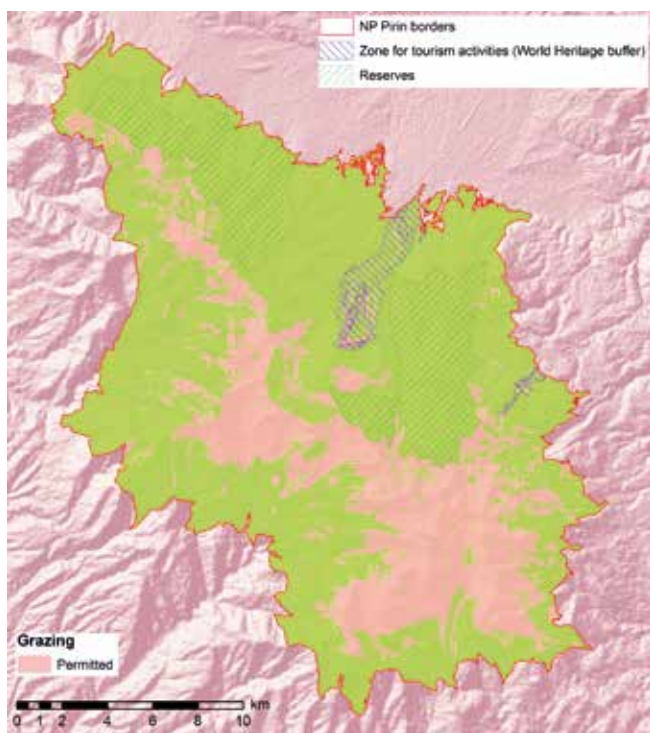


Fig. 7: Grazing regimes in Pirin NP under DUMP 2014.

Map: For The Nature Coalition

Procedures of SEA & AA. Currently, the contradictory decisions of MoEW concerning the need for DUMP to undergo a SEA & AA are appealed in the Supreme Administrative Court (SAC). SAC ruled that the decision requiring SEA for the plan was not issued in compliance with all relevant legislative provisions. MoEW did not appeal this decision and is not issuing a clear decision that requires an SEA & AA in compliance with legislative provisions. Currently, a case raised by the NGOs against the MoEW decision to skip SEA & AA is ongoing.

Bansko Ski Zone Concessionaire's (Yulen JSC) statement issued in 2014 within the consultation process on DUMP 2014. In their position paper of 2014, the concessionaire disregards the supremacy of MP and fully adheres to the "concept of development of Tourist Resort Locality (TRL) Dobrinishte – Bansko – Razlog – Predela" and proposes to provide some 333 km of ski runs and ski trails plus 113 km of lift facilities for the development of winter tourism," in comparison with a total of 77 km of ski runs advertised at present. The above statement shows the real intentions for a new expansion of ski runs and facilities in Pirin. A presentation of the TRL illustrates the spatial location of the new ski runs, which remarkably coincide with the newly proposed tourism zones in DUMP 2014 (see Fig. 8).

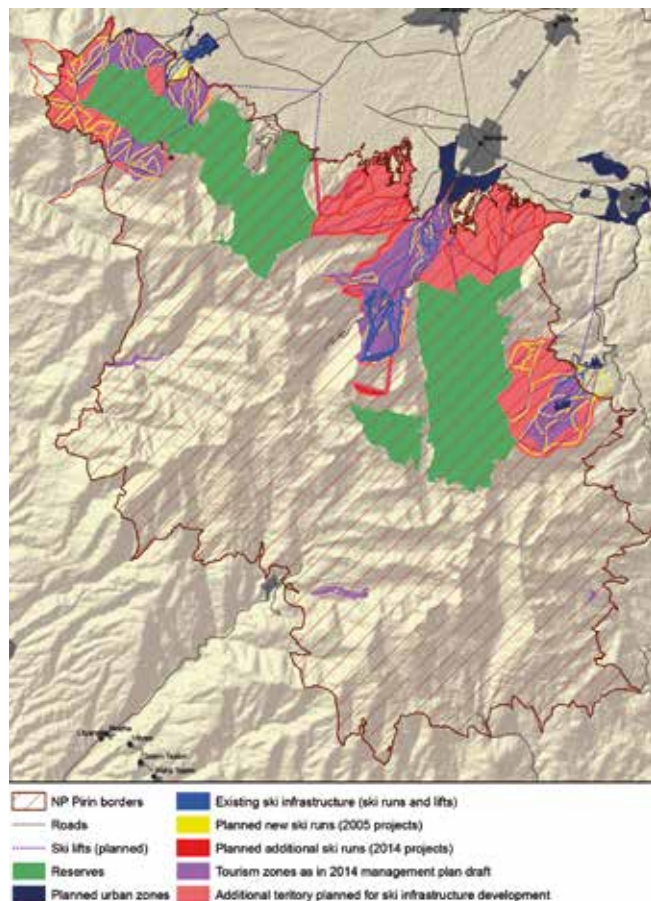


Fig. 8: Plans for Tourist Resort Locality "Dobrinishte-Bansko-Razlog-Predela" affecting Pirin National Park.

Map: For The Nature Coalition

Disregarding stakeholder statements (MoEW position before SAC). A total of 425 statements have been submitted in the course of public consultations on DUMP 2014. The authors addressed only a small part of these. Thus, the opinion of a large number of scientists and stakeholders was disregarded and not reflected.

2. Current WHS buffer areas and impact of existing ski zones on Pirin's OUV

In 2010 MoEW identified that the area under concession was exceeded by 60%. Instead of cancelling the Ski Zone Concession Contract, the Government proposed a revision of the contract and the concessionaire to be granted 1069.58 ha instead of the current 99.55 ha. State support further facilitated construction and included subsidies for sports competitions, totaling over the years more than BGN 10 mio. (EUR 5.1 mio.), exceeding many times the concession fee which is annually paid by the concessionaire to the MoEW.

Excluded from the WH property due to ruining its OUV, the "buffer areas" do not represent typical buffers, since these areas do not surround the park to secure its protection but penetrate and divide it. The buffer zone management is essential for meeting criteria vii and ix. Current and future development of ski infrastructure threatens the integrity of the Site's OUV and leads to its fragmentation. Other negative processes are also developing, e.g. increasing use of potable water from the Park. Construction of a water supply pipeline from two water catchments within the WHS commenced on 24 Oct 2016. SEA & AA of the project were twice suspended by MoEW (in 2010 and 2015) and thus have not been done. The Master Plan of Bansko Municipality (2016)² indicates that before connecting the two catchments to its water supply system, the Municipality had been permitted to use 38 l/s mainly from the NP (WHS buffer zone), but actually uses more than 100 l/s.

3. Non-compliance with decisions and procedures of the WHC to date

3.1. World Heritage Committee's decisions have been systematically and repeatedly disregarded, including the most recent ones: *"to ensure that the draft Management Plan is revised to comply with the requirements set out by the MoEW...; requests the State Party to fully implement all pending recommendations; to provide the World Heritage Centre information on other ongoing processes, that might affect the OUV of the property; not to approve any further developments within the property or its buffer zone until the draft Management Plan has been subject to the procedures for SEA and AA"* (2016); *"a) ensure effective wider regional planning for economic de-*

velopment, and ensure that no developments that exceed the capacity of the area are permitted, ... d) put in place processes to monitor the impacts of the ski and other activities within the buffer zone on the surrounding property, in order to ensure that they do not negatively impact on the OUV of the property" (2012); *"7. Encourages the State Party to commission an independent assessment of the capacity of the property and its buffer zone in order to set clear usage limits for the Bansko ski zone"* (2011).

3.2. Key gaps in the government's State of Conservation Report (SOC). Two serious incompliances with Decision 40 COM 7B.93 (2016) were not even mentioned by the State Party (MoEW) in their SOC report from 01 Dec 2017, specifically (1) the ongoing procedure for an amendment of MP 2004 despite the fact that it affects not only the buffer areas but also the WH property (completed with Government decision of 29 Dec 2017); and (2), in Jan 2016, MoEW returned DUMP 2014 for revision. In July 2016 WHC in its decision requested the Ministry *"to ensure that the draft MP is revised to comply with the requirements set out by MoEW"*. The company hired to draft the plan refused officially to reflect eight remarks of MoEW in the document, e.g. crucial remarks affecting zoning and regimes. Nonetheless, in March 2017, the Ministry moved the procedure further by issuing a decision that DUMP 2014 must not undergo a SEA & AA.

4. Socio-economic aspects

The drastic changes in Pirin NP management are not supported by any data or analyses upholding the thesis that ski development within the Park would bring socio-economic benefits. On the contrary, an overview of the socio-economic situation in Bansko municipality shows population reduction, decrease of property values, seasonal employment due to the focus on winter tourism, continuous state subsidy (including for the expensive project for water supply and sewerage refurbishment at the cost of over BGN 60 mio. (EUR 30.7 mio.), as well as the aforementioned state subsidies for the world ski cups.

5. Public campaign and support

For two months, thousands of citizens across Bulgaria and Europe have been protesting against the government decision.³ The WWF collected more than 125 000 signatures from all around the world in support of preservation of Pirin NP, asking the Prime Minister of Bulgaria, at handover, to reject DUMP 2014.

² <http://bansko.bulplan.eu/index.php?mode=4&theme=9>

³ <https://www.euractiv.com/section/energy-environment/news/bulgarias-eu-presidency-start-drowned-by-protest-shouts/>



Fig. 9: Thousands of people protested in Sofia on 4 and 11 January 2018 against more ski runs and lifts in Pirin National Park.

Photo: Antonia Ivanova

Expectations from the World Heritage Committee

Based on the findings presented here, the criteria of including Pirin NP in the List of World Heritage in Danger are met. At least, the following specific criteria for potential danger are met:

- planned development projects within the property and its buffer areas threaten the property;
- the amended MP 2004 and the DUMP 2014 proceeded and defended before SAC by MoEW is inadequate to secure the protection of the OUV of Pirin.

In order to restore the legal background of preservation of Pirin NP and WHS, a strong and clear decision on the Pirin case is needed. We ask the WHC to urge the Bulgarian Government:

- to withdraw its contested decision from 29 December 2017 with amendments to the current MP 2004 allowing for new ski facilities and other construction in Pirin NP; and
- to ensure that any further amendments to the current or any draft new park management plan are subjected to SEA&AA.

Including Pirin in the List of WH Sites in Danger would send a strong message to the Government and to the public in Bulgaria that the international community is aware and engaged with the preservation of the World Heritage and that any further disregard of the WH Convention and the decisions of the WHC are unacceptable.

Western Caucasus – Candidate for the List of the World Heritage in Danger

Yulia Naberezhnaya, Russian Geographical Society,
and Sophia Rusova, Environmental Watch on the North Caucasus



The problem of optimizing the boundaries of the Western Caucasus World Natural Heritage Site No 900 has been on the top of the agenda since its establishment due to the lack of the low-mountain broadleaf forest belt (oak and chestnut trees belt). Because of this factor, the forced long-term adaptation of ungulates to actually extreme habitat conditions during the winter months, abounding in snow, maintains their populations in a state close to the climax, providing for the probability of their mass mortality because of adverse weather conditions. In order to solve this problem, at the stage formulating the justification for establishing the “Western Caucasus” nomination, the experts had initially proposed to include the listed and protected areas of the Sochi National Park bordering the Caucasus Nature Reserve (Shaposhnikov State Caucasus Natural Biosphere Reserve) on the south into the World Heritage Site. However, they failed due to a lack of agreement in principle and any activities associated with this proposal from the management of the Sochi National Park.

In the course of preparations for the 2014 Winter Olympics, as well as afterwards, the land use planning of the Sochi National Park was repeatedly changed. The rationale for the land use changes were the plans for the construction and expansion of ski resorts. As a result of the land use changes, according to the

experts, large ungulates and predators have lost significant areas of their main winter habitats and have been pushed higher into the mountains in near extreme conditions. The historically established animal migration routes have been partially dislocated, and in some places even destroyed. Deforestation on the slopes has provoked activation of landslide processes, mudflows, and soil erosion.

Around the ski resorts the anthropogenic burden on the natural areas is rapidly growing. This includes both uncontrolled tourism using special gear and equipment (jumping, all-terrain vehicles, snowmobiles, etc.), and direct destruction of the protected landscapes and ecosystems during construction work, accompanying expansion of the ski resorts and other recreational facilities.

Right within the boundaries of the Western Caucasus World Heritage Site, illegal logging and planning and construction of



Fig. 1: The valley of the Mzymta River, the territory of the Sochi Federal Wildlife Refuge, which was planned for inclusion in the Caucasian Reserve, and the World Natural Heritage “Western Caucasus”.

Map: Yulia Naberezhnaya

motorways have been observed, but the main threats to the universal value of the Site are the plans to expand private ski resorts, supported by amendments to the legislation. These amendments, made before 2014 in order to legitimize the construction of infrastructure for the 2014 Winter Olympics mountain cluster in the territory of the Sochi National Park, have not yet been abolished. The Caucasian State Reserve has been granted the status of a Biosphere Reserve based on the decision of the Presidium of the International Coordinating Council of the Man and Biosphere UNESCO Program dated 19.02.1979.

Currently, the Biosphere Reserve status can cause great harm to this Heritage Site as it provides an opportunity under the guise of “biosphere polygons” to construct and expand ski resorts in the Heritage Site territory. In 2016, new amendments to the legislation of the Russian Federation, which directly threaten the preservation of the Heritage Site were made.

Based on these amendments, the Government of the Russian Federation has received a document providing for the creation of new biosphere polygons in the territory of the Caucasian Reserve, which is the core of the Western Caucasus World Heritage Site. This “polygon” on the initiative of Gazprom and Rosa Khutor is planned to be created in the southern part of the Caucasian Reserve and will increase the ski resorts area by 31,000 hectares of the protected areas of the Caucasian Reserve, the Sochi National Park, and the Sochi Wildlife Reserve. Of these, more than 22,000 hectares are within the boundaries of the Heritage Site.

There is already a negative example of constructing a ski resort under the guise of a “biosphere polygon” followed by attempts to withdraw these lands from the Heritage Site. The Biosphere Science Center in the Fisht area (Lunnaya Polyana (Moon glade) stow) continues to expand as a ski resort, although UNESCO has been issuing warnings for already 10 years.

In order to implement the plans for the construction of a new ski resort on the Lagonaki plateau directly within the Heritage Site (please refer to 38.COM 7B.77), the Lagonaki biosphere polygon has been established. Pursuant to Resolution of the Russian Federation Government No 603-r dated 23.04.2012, the construction of ski lifts in the territory of the Lagonaki biosphere polygon is permitted. In the recent few years, a motor road to Lagonaki biosphere polygon has been constructed to as far as the settlement of Mezmay, and a power line has been laid directly to the boundaries of the Heritage Site.

Furthermore, a serious problem is still that the regional natural monuments and the buffer zone of the Caucasian Reserve continue to function as a forestry since the Site establishment. Authorized and illegal logging are annually performed in their territory. In 2015-2017, new large-scale loggings were observed in the territory of the Heritage Site, in particular, within the boundaries of the upper reaches of the Pshekha and Pshe-

hashkha rivers natural monument. In Adygea, the territory of the Heritage Site is used for commercial wood harvesting.



In 2017, the plans to build motor roads in the Heritage Site territory became more intensive, options for the construction of a motorway Cherkessk – Krasnaya Polyana roads via Lagonaki plateau and the Lunnaya Polyana stow are under consideration, and the Krasnodar region administration is actively preparing for looking for investors and coordinating road construction projects via the protected areas with the Ministry of Transport and the Ministry of Natural Resources of the Russian Federation. New motor roads via the Caucasus Reserve have been included into the amendments to the Sochi City General Plan in 2017.

On 19 March 2018, a day after the RF President election, RF Ministry of Natural Resources signed Order No. 106 “On the reorganization of state institutions subordinate to Ministry of Natural Resources and Ecology of the Russian Federation.” It refers to the integration of the Sochi National Park into the Caucasus Natural Biosphere Reserve. Upon completion of the reorganization, it is planned to rename the Federal State Budgetary Institution “Shaposhnikov Caucasus Natural Biosphere Reserve” to FSBI “The Joint Directorate of Shaposhnikov Caucasus Natural Biosphere Reserve and Sochi National Park”. The abbreviated name is to be FSBI “Wild Caucasus”. In which case the Sochi National Park as a legal entity will cease to exist.

At the same time, the true goals and objectives of the Order remain out of the eye of the public and experts. The reorganization procedure has been carried out behind closed doors, no arguments to support the decision and no discussions have been conducted, which raise concerns that the main goal is to facilitate and speed up the unlawful entry of private ski resorts into the conservation area. This poses more direct risks to the preservation of the West Caucasus World Natural Heritage Site.

Based on the UNEP commission proposal before the 2014 Winter Olympics, compensatory measures have been developed to preserve the mountain ecosystems instead of those irretrievably converted for the accommodation of sports infrastructure facilities and ski resorts. However, instead of the planned ex-

pansion of the Caucasus Reserve with inclusion of the Sochi Reserve (the upper reaches of the Mzymta River), adding this area to the list of the World Natural Heritage, this area has been rented by the Rosa Khutor ski resort and its affiliated structures. In 2015, the Ministry of Natural Resources for the purpose of expansion of the Rosa Khutor ski resort made amendments to the land use planning of the Sochi National Park and the Sochi Federal Wildlife Reserve. As a result, in 2017, Rosa Khutor, LLC, and its affiliated legal entities rented both new land plots in the territory of the Sochi National Park and the land plots within the boundaries of the Sochi Federal Wildlife Reserve.

The valley of the upper Mzymta river is a unique floristic and faunal region, which has no analogues. Here exist 112 protected species of plants, mushrooms, 27 species of vertebrate animals which require special attention or are listed in the Red Data Books, including 16 species listed in the Red Data Book of the Russian Federation (2007). In the last 15 years this area has remained the only confirmed migration route of leopards moving from east to west. Its destruction will pose a real threat to the successful implementation of the project for reintroduction of the Asian leopard in the Caucasus. It should be specially emphasized that withdrawal of the Sochi Reserve area from protection and further development of the Mzymta River valley will definitely have enormous human-induced pressure on the adjacent Caucasian Reserve (WHS) areas, and will significantly complicate the protection of a significant part of its boundaries. The upper reaches of the Mzymta river provide more than 50% of the river's flow. Further development of the floodplain of the river's upper reaches will pose a threat to the provision of Sochi with drinking water taking into account recently deepening summer droughts.

All these factors evidence that the Western Caucasus WHS is under threat. In 2017, at the 41st session of UNESCO, public environmental organizations already raised the need to include it into the Red List of the endangered sites. In the decision made at the session, UNESCO requested to provide a report on the actual status of the Site. However, the official report provided did not describe the real situation. In order to maintain the key values of the Western Caucasus WHS it is required to:

1. Reject the ski resort plans in the area of the World Heritage Site, on the south in the Sochi Wildlife Reserve, to include the territory of the Sochi Federal Wildlife Reserve into the Caucasus Nature Reserve, rescinding lease agreements with Rosa Khutor and its affiliated legal entities in accordance with the Russian Federation commitments given under the UNEP recommendations before the 2014 Winter Olympics, and with Decisions of the 37th and 38th session of the UNESCO World Heritage Committee;
2. Ensure implementation of the UNESCO World Heritage Committee recommendations made over ten years since 2008 at UNESCO sessions, to transform the Lunnaya Polyana ski resort into a real scientific center.
3. Expand the Site area by the Psebai Regional Faunal Reserve, which, also in accordance with the Russian Federation commitments assumed before the Olympic Games, shall be added to the Caucasian Nature Reserve.
4. The Russian Federation has prepared a new nomination for Site No 900. During the visit of the UNESCO assessment mission in November 2015, the Russian State Party made a statement on the withdrawal of the application. It is required to re-submit the withdrawn application for the renomination of the boundaries of the Western Caucasus WHS, implying, inter alia, inclusion into the Site of a part of the Sochi National Park which fully meets the criteria of the World Natural Heritage (IUCN Category II).
5. Enhance the legislation governing the protected areas and control over its implementation by including into the decision of the 42nd UNESCO session the recommendations to refrain from allocation of new biosphere polygons for the expansion of ski resorts within the Heritage Site boundaries.



Therefore, there are two options for the near-term course of events: (1) entering Western Caucasus Site No 900 into the list of the "World Heritage in Danger", or (2) urgently introducing a moratorium on further expansion of ski resorts within the site boundaries and the adjacent territory of the Sochi National Park in the Krasnaya Polyana area, as well as optimization of its boundaries in accordance with the boundaries of the large mammals' areas in terms of compliance with Russia's pre-Olympic commitments. The emphasis should be placed on the need to preserve the upper reaches of the Mzymta River within the Caucasian Reserve and the expansion of the West Caucasus World Natural Heritage Site.

Full implementation of the planned activities, referred to, among other documents, in the "Action Plan for Restoration of Mzymta River Ecosystem, Comprehensive Environmental Monitoring and Preparation of Compensatory Measures within the Environmental Support for the XXII Winter Olympic Games and the XI Winter Paralympic Games in Sochi", announced among Russia's pre-Olympic commitments, would significantly improve the preservation of the West Caucasus World Natural Heritage Site.

The Virgin Komi Forests are Still in Danger

Mikhail Kreindlin and Andrey Petrov, Greenpeace Russia



The Russian Federation continues not to implement the decisions of the World Heritage Committee regarding Virgin Komi Forests World Heritage property.¹

The State Party of the Russian Federation still did not revoke the exploration and exploitation licenses granted for the Chudnoe mine. Instead, the territorial agency of the Federal Agency for Subsoil Use, subordinated to the Ministry of Natural Resources of Russia, twice in 2017 amended the license for the development of this field (Supplement (*amendment*) to license No. 172 of April 24, 2017, Supplement (*change*) to license No. 209 of September 25, 2012).² Thus, the Russian authorities continue planning gold production at Chudnoe field.

The legality of the park boundaries has been repeatedly confirmed by the Supreme Court of Russia,³ and the Arbitration Court ruled that Gold Minerals Co. should abandon the part of the park that is occupied by it unlawfully.⁴ However, the implementation of this decision was postponed until September 2018.⁵

Thus, at present, the property of Gold Minerals (including drilling rigs) is still located inside the World Heritage property. This is confirmed by the publicly available data of space imagery (a photo dated December 7, 2017), see fig. 1.

Greenpeace this January applied to the General Prosecutor's Office with the demand to take measures for the revocation of the license for Gold Minerals Co., but no activities in this direction were undertaken by the prosecuting authorities.

The Ministry of Natural Resources of Russia has developed and published amendments to the Federal Law "On Specially Protected Natural Territories" providing the inclusion of Article 2.1 in the law which contains the following provisions:⁶

¹ <http://whc.unesco.org/en/decisions/6762>

² <http://www.rfgf.ru/license/itemview.php?iid=2700517>

³ http://supcourt.ru/moving_case.php?findByNember=%C0%CA%CF%C814-953

⁴ http://kad.arbitr.ru/PdfDocument/773be15b-498e-4545-a486-ad2c-c86b98c5/A29-5953-2015_20161017_Opredelenie.pdf

⁵ http://kad.arbitr.ru/PdfDocument/5efbaec6-55d0-4f48-87a4-16bb837af70e/A29-5953-2015_20170119_Opredelenie.pdf

⁶ <http://regulation.gov.ru/projects#npa=56055>



Fig. 1: Space imagery of Chudnoe Field Gold Exploration.

Source: Google Earth

"The modification of the boundaries of specially protected natural areas of federal significance, in the event of the exclusion of land and water bodies from them, is allowed only with respect to:

b) Land plots and water bodies necessary for carrying out activities related to the organization of the defense of the Russian Federation, ensuring the protection of the State Border of the Russian Federation, in the absence of alternative solutions for the location of the relevant facilities;

c) Land plots and water bodies according to individual decisions of the President of the Russian Federation adopted in the absence of alternative solutions to the strategic tasks of social and economic development."

There is reason to believe that the Head of the Komi Republic, with the support of the Ministry of Natural Resources, can easily justify that the development of the Chudnoe field in the National park is the “strategic task of socio-economic development” and there are no “alternative solutions”.



Fig. 2: The gold exploration settlement at the Chudnoe Field. Photo: Greenpeace Russia

Thus, the adoption of the bill is likely to lead to the seizure of a land plot occupied by the Chudnoye field from the National park and the subsequent development of this field.

At the same time, tourism is actively developing in the Pechoro-Ilychsky Biosphere Reserve (part of the property).

On the official site of Pechoro-Ilychsky State Natural Biosphere Reserve in 2016 the following information was posted: “In 2016 such environmental walking routes to the Manpupuner Plateau as “Source of Pechora River – Manpupuner Plateau “and” Ust-Lyaga – Manpupuner Plateau” are temporarily closed for visits due to the lack of infrastructure facilities and the need to reduce the anthropogenic load for the restoration of natural ecosystems. The administration of the reserve does not accept requests to visit these routes in 2016.”

This is confirmed by the information specified in the report that in 2015 the staff of the reserve inspection detained 94 violators illegally staying in the reserve.



Fig. 3: Transportation of tourists in the roadless area of the Yugyd Va National Park is possible only with heavy machinery which has a highly destructive effect on the thin cover of subarctic vegetation.

Photo: J. Metselaar / M. Grishchenko

However, in 2017, two routes were opened on the Manpupuner Plateau, and a schedule for visiting the Plateau in 2017 was placed on the website of the reserve.⁷ There are serious doubts that within one year the natural ecosystems have been restored to such an extent that it became possible to launch two excursion routes on foot, providing for the stay of a large number of people (450 persons/day per season). Nonetheless, the Order of the Ministry of Natural Resources of Russia dated June 15, 2017 N 302 approved a new provision on the reserve, which fixed all these routes.⁸

The website of the reserve also contains information on these routes for 2018, including usage of snowmobiles in the winter season of 2018 and a visit schedule for February-March 2018.⁹ In addition, there is a plan for the construction of a runway for airplanes inside the Reserve area (in the area of Manpupuner Plateau).¹⁰

Thus, there is reason to believe that the planned tourism activities in the Pechoro-Ilychsky Reserve will lead to violations of the Outstanding Universal Value of the Virgin Komi Forests World Heritage property.

The license for the development of the Chudnoye deposit has not been revoked. The current license has been amended. At the site of the deposit, no work has been carried out to reclaim the lands that were disturbed as a result of the geological exploration work of 2011-2012. Within the heritage property, drilling rigs and other equipment continue to be located. Under various pretexts, the implementation of the court decision on the removal of exploration equipment (including drilling rigs) from the territory of the Chudnoe field is postponed.

The number of tourist routes increases within the Pechoro-Ilychsky Reserve. These routes are fixed by the decision of the Ministry of Natural Resources of Russia. At the same time, the Committee’s demand to develop a strategy for integrated sustainable management of tourism activities has not been fulfilled.

Consequently, Decision 40 COM session has not been implemented by the State Party to the Convention.

Thus, the State Party to the Convention adopted decisions and took actions that correspond to the criteria for the inscription of the Virgin Komi Forests World Heritage property into the List of World Heritage in Danger at the 42nd Session of the World Heritage Committee.

⁷ <https://www.pechora-reserve.ru/marshruty> and <https://www.pechora-reserve.ru/grafik-poseshenij>

⁸ <http://base.garant.ru/71718010/>, see in the Report.

⁹ See footnote 7.

¹⁰ http://ourreg.ru/wp-content/uploads/2017/06/region_02-18.pdf

Concerns Regarding implementation of WHC Decisions on Lake Baikal and Recommendations for the 2018 World Heritage Committee Decision

Rivers without Boundaries International Coalition (RwB) and Greenpeace Russia



This document was submitted to the World Heritage Center and IUCN in April 2018 and is published here unabridged and unedited (the editors).

Lake Baikal is undergoing serious environmental crisis. In 2017 among the good news was revocation by the Ministry of Natural Resources of the mining license for Kholodnenskoye Zinc deposit, which was the major step forward in ensuring lasting protection of the World Heritage Site. However, this is the only truly good news from 2017 that we can share. As we submit our comments the Lake Baikal water surface has already fallen almost quarter of a meter¹ below the previously set minimal level. Throughout the year local communities reported to press and authorities massive cases of land grabs on the lakeshore, mostly associated with international tourism development. Research of citizen-led "Baikal Expedition" has shown that even very low concentrations of pollutants/nutrients may induce serious negative reaction in local aquatic ecosystems, because of highly oligotrophic character of the lake.

We are deeply concerned with failures, delays and denials in implementation of WHC decisions on Lake Baikal. We want to draw Your attention to several specific aspects related to hydropower impacts and environmental monitoring of the Lake as well as new easements and exceptions made by the Government of Russia to Lake Baikal protection regime.

1. In 2016 the WHC requested that relevant agencies in Mongolia

- Ensure that the EIA developed for the Egiin Gol Project includes assessment of potential impacts not only on the hydrology, but also on the ecological processes and biodiversity of the property, and specifically on its OUV, and to provide the full EIA report to the World Heritage Centre (p.11a).
- Develop an assessment of cumulative impacts of any planned dams and reservoirs in the Selenge river basin that

may have an impact on the OUV and integrity of the property and to provide this assessment to the World Heritage Centre (p.11 d).

- Not approve any of the projects until the above-mentioned EIAs and assessment of cumulative impacts have been reviewed by the World Heritage Centre and IUCN (p.11e).

2. In 2016 the WHC issued additional decisions

In 2017 the WHC welcomed the intention of the State Party of Mongolia to undertake an additional study on the impacts of the Egiin Gol project on the biodiversity of the property, and notes the information provided by the State Party of Mongolia regarding the Shuren hydropower project and the Orkhon river project, including the Terms of References for the development of Regional Environmental Assessments (REAs) and Environmental and Social Impact Assessments (ESIAs) for these projects;(p.7).

Also in 2017 the WHC reiterated furthermore its request to the States Parties of the Russian Federation and Mongolia to jointly develop a transboundary SEA for any future hydropower and water management projects which could potentially affect the property, taking into account any existing and planned projects on the territory of both countries, and requests both States Parties to ensure that the results of such transboundary SEA guide the elaboration of ESIAs of any concrete hydropower and water management projects, including the planned Shuren hydropower project and the Orkhon river project;(p.8)

3. Concerns related to Egiin Gol Hydro Project

We have to report, that according to information available to us, the WHC Decisions quoted above have not been implemented in full and some of them have been directly violated by actions of the Government of Mongolia. After cancellation of feasibility studies for Orkhon and Shuren dam projects, the

¹ On April 15, 2018 the level was 455.77 - 23cm below "minimum level" assigned in 2001.

Egiin Gol Hydro remains the single most potent threat to ecological integrity of the Lake Baikal in Mongolian part of the basin. Construction of this hydro was launched in late 2015 and only thanks to timely reaction and resolute position of the World Heritage Committee this threat has been averted in 2016.

The Government of Mongolia listed the Egiin Gol Hydro construction project in its Power Plant Construction Plan for 2018, with specific investment of 20 billion tugrugs (*ca. 7 mio. €, the eds.*) and a target to complete 10% of construction works in 2018². The Egiin Gol Hydropower Company, that by July 2017 has a debt of 22 billion tugrugs³ to the Development Bank of Mongolia⁴, recently received new investment to continue creation of Eg River Hydro. Thus in September 2017 the State Property Agency ordered the Development Bank of Mongolia to provide additionally USD 2,5 million for the creation of this hydropower plant⁵, which is clearly contrary to the WHC decisions.

The new Minister of Energy Mr. Davasuren calls Egiin Gol Hydro “first priority project” both in his interviews and response letters to NGOs⁶. Davasuren admits that assessment of Egiin Gol impacts on ecological processes has not been done yet, however he openly expresses belief that such assessment will show absence of any impacts on the Lake Baikal World Heritage Site⁷.

This statement was made by the Minister despite of release to Mongolia side of the preliminary results of research conducted by Russian scientists, which predict possibility of serious negative impacts on Selenge-Baikal aquatic ecosystem from planned dams, including Egiin Gol Hydro.

For example, scientists claim that 3–5 times increase in winter flows⁸, inevitable if any large hydropower reservoir is built, will seriously disrupt spawning of the Selenge population of the Omul – Baikal Cisco (*Coregonus migratorius*) – the most important fish species of Lake Baikal economically and ecologically. Response matrices developed after the 2017 hearings confirm that Egiin Gol Hydro should be analyzed during the cumulative

impact assessment⁹. The results of the research presented at the 2017 hearings have been definitely reported to the Energy Ministry of Mongolia, since now it is a lead agency overseeing the assessment planning by MINIS Project.

Given that in Mongolia “additional ecological assessment” is in the hands of Egiin Gol Hydropower Company subordinate to the Ministry of Energy, we have grave concerns regarding possibility of objective impartial assessment of impacts, when the Minister already knows and has announced the assessment outcome.

The Egiin Gol Hydro and other hydropower in Selenge Basin are listed as #1 climate mitigation measure for which Mongolia requests international funding in country’s NDCs submitted under the Paris Agreement of UN Convention on Climate Change (please see our paper in the 2018 World Heritage Watch Report addressing this issue)

We are also deeply concerned, that instead of objective holistic revision of the Egiin Gol Hydro EIA in the light of WHC\ IUCN requirements, some substandard study may be prepared to match conclusions already announced by the Minister of Energy.

Our main concern, however, is willingness of the Mongolian Government to proceed with Egiin Gol Hydro project before the SEA (strategic environmental assessment) and the CIA (cumulative impact assessment) for all water infrastructure plans in Baikal Lake basin have been implemented and results submitted to the World Heritage Center and the IUCN for review.

4. Concerns related to World Bank MINIS Project slow progress

We are also deeply concerned that while Egiin Gol Hydro construction is being pushed forward, the implementation of the cumulative impact assessment of all projects (CIA) and the SEA requested by the WHC is being postponed.

The cumulative impact assessment of all projects (CIA) and the SEA should have been addressed by the MINIS Project implemented on a loan from the World Bank (WB) in Mongolia. In July 2017, the World Bank Inspection Panel¹⁰ (WBIP) encouraged WB Management to ensure that the decisions of the World Heritage Committee are taken into account in any revision of the relevant TORs, which is consistent with WB policies on international conventions and its environmental safeguards. As a consequence, in September 2017 the MINIS cancelled tenders for REANESIA and feasibility studies for Orkhon and Shuren

2 CONSTRUCTION WORK OF 11 POWER PLANTS TO START THIS YEAR. March 1, 2018 <https://www.news.mn/?id=272613>

3 Approximately USD 9 million

4 Interim Consolidated Financial Statements of the DBM <https://s3-us-west-1.amazonaws.com/ubinfo-s3/dbm/pdf/bcbde14c8fb4707e040720683abce805.pdf>

5 Decision of State Property Agency#376, September 12, 20017 pcsp.gov.mn/file/1976

6 Letter from Davasuren in response of 8 NGOs of Human Right Forum of Mongolia. March 5, 2018

7 On the quest to energy independence. The UB Post. 28 Feb 2018, By T.BAYARBAT <https://www.pressreader.com/mongolia/the-ub-post/20180228/281698320239617>

8 <https://1baikal.ru/en/soxranim-bajkal/bajkal-pod-oxranoj/lake-bajkal-under-threat-ecologists-on-the-building-of-a-hydropower-plant-at-the-selenga-river>

9 <http://www.minis.mn/en/disclosures-of-irkutsk-consultation-materials-123456>

10 3rd Report of WBIP <http://ewebapps.worldbank.org/apps/ip/Pages/ViewCase.aspx?CaseId=107>

hydropower projects. The Government of Mongolia and the WB agreed to develop as a first step a regional environmental assessment (REA) with CIA as its component (which also covers Egiin Gol Hydro as most ready-to-go project and any other planned water infrastructure).

Nine (!!!) months since the Government of Mongolia agreed to the WB Inspection Panel recommendation no tangible progress has been made in designing new assessment plans and consulting with stakeholders. Only in mid-April 2018 the REA terms of reference developed in June 2017(!) became a subject of substantive discussion at Expert Group Meeting on Water Infrastructure held in the realm of Mongolian-Russian Intergovernmental Committee on Transboundary Waters. Bilateral Expert Group provided more than 100 recommendations on REA ToR improvement and development of the next draft ToR is unlikely before June.

We question whether such a study can be implemented at all given that MINIS Project has to terminate in September 2019.

5. Concerns on fulfillment of WHC and IUCN requirements

We also see signs that contents of the REA may be compromised and are not going to meet WHC/IUCN requirements for such assessments. The RwB experts in March-April 2018 reviewed the Draft REA ToR and believe that it does not reflect most requirements listed in WHC decisions and does not follow IUCN "Advice Note on Environmental Assessment".

On March 16, 2018, answering the RwB question on the fulfillment of the World Heritage Committee's requirement to hold the SEA, MINIS stipulated that "Strategic aspects have been ...covered by separate but related strategic assessments of **least cost power production** for the Mongolian central power system and water supply to Gobi." We assume that when the WHC and IUCN in the World Heritage Advice Note on Environmental Assessment requested to look at alternatives, they implied that environmental and social impacts of various alternative scenarios of energy system development should be considered along with "least cost power\water production" to achieve sustainable development outcomes. The WBIP Final Report stresses that the MINIS Project "will also analyze alternative investments and technology, looking at options to generate energy with less environmental impact", while the MINIS reply promises to assess "least cost power production", a biased approach that in 2013 was completely inappropriately pursued in "Shuren HPP Pre-feasibility Study"¹¹. This clearly demonstrates the failure of the MINIS Project to follow\consider WHC and subsequent WBIP recommendations and creates huge concern

regarding fulfillment of requirements of the World Heritage Advice Note on Environmental Assessment.

Another fundamental violation of requirements stipulated in the World Heritage Advice Note on Environmental Assessment was repeated refusal to hold public consultations on the key planning document - Draft REA ToR. This severely diminishes ability of the civil society to participate in the assessment process and the RwB International Coalition and other NGOs\citizen groups had to include this concern into their Request for Inspection submitted to the World Bank Inspection Panel last month.

We stress that no valid environmental assessment can be procured without continuous involvement of civil society and other stakeholders by means of public consultations at all stages of those assessments.

We believe that implementation of SEA and CIA studies and their submission to IUCN/WHC for review should remain a strongly required precondition to approval and funding of any dam\reservoir\water diversion project in the Lake Baikal Basin.

All that said, situation with implementation of the WHC decisions on Lake Baikal in Mongolia is still better, than that in Russia, where this World heritage site is situated.

7. Decisions focusing on responsibilities of the Russian Federation

We are also deeply concerned with failure of the Russian Federation to implement World Heritage committee (WHC) decisions and, especially, by steps taken in direct violation of those decisions. In 2017 the WHC:

- urged the State Party of Russia to elaborate an Environmental Impact Assessment (EIA) of potential impacts of existing water use and management regulations on the Outstanding Universal Value (OUV) of the property, in line with IUCN's World Heritage Advice Note on Environmental Assessment, and not to introduce any further changes in the regulations until their effects on the property are fully understood;
- and reiterated its request to the State Party to develop a property-wide ecological monitoring system in order to identify the scale and causes of such changes and the responses required to preserve the ecological integrity of the property;

None of these decisions have been observed\implemented

¹¹ <http://www.minis.mn/pfs-shuren-hhp-eng.pdf>

8. Irresponsible hydropower management leads to wider fluctuation of lake levels

On December 27, 2017 the Government of Russia issued Decree # 1667¹², which extended for 3 years (2018-2020) the allowable range of fluctuations for the Lake Baikal water level from 1 meter to 2.3 meters. The extension is necessary to sustain “water-heat-energy-supply to population and industry” and primarily serves the interest of En+Group (and their local subsidiary Irkutskenergo) - company that owns both hydropower plants on Angara River and coal-fired thermal power plants in the area, which require water for cooling.

Our preliminary calculations show, that if the En+Group has had implemented adaptation measures (e.g. reconstruction of water-supply intakes from Angara River so they could function during lower river discharge, etc.) the outflow through Irkutsk HPP from the Lake could be reduced from current 1300 m³/sec to 600-1000 m³/sec and that would prevent the Lake Baikal from decreasing below the minimal allowable level determined in 2001 by Governmental Decree #234. Lowering the Lake level exacerbates current ecological crisis in near-shore ecosystems of Lake Baikal World Heritage site and negatively affects livelihoods of local population, which leads to public protests and demands to remove other stringent environmental limitations associated with the heritage site. The RwB, Greenpeace, WWF and dozens of other environmental groups commented in writing on the draft Decree # 1667 and warned the government against issuing it, but none of those opinions were taken into consideration.

The RwB and Greenpeace in addition challenged the En+Group during its IPO in London in November 2017 which led to a notable line in the IPO Prospectus that the Group will “mitigate and prevent the negative environmental impact of its hydro power plants on Lake Baikal”¹³. However, in practice the company has taken no measures, but instead sponsored extensive propaganda campaign in Russian press to blackmail and silence opponents. Besides, recent listing of the En+Group and its owner Oleg Deripaska by the US Treasury for economic sanctions, further reduced opportunities for negotiating more rational water management with the company, for it now faces quite different key challenges and may be less inclined to pay attention to environmental obligations.

As far as we can read the 2017 State of Conservation Report submitted by Russia in 2018 does not even mention issuance of the Decree # 1667, although it happened in 2017.

¹² <http://m.government.ru/docs/30850/>

¹³ page 167 of the EN+ Prospectus <http://enplus.ru/documents/2017/en-plus-group-prospectus.pdf>

9. Denial to undertake the EIA of existing water use and management regulations

The State of conservation report submitted by Russia openly denies necessity to subject current or future water management regime to an EIA, using very questionable arguments to justify this statement.

It refers to the water-management research (R&D 15-01) commissioned by the Federal Agency for Water Resources in September 2015 to justify change in water level regulation. Ever since this research was criticized for its biased approach and for complete absence of any valid ecological\biological components. Report on research results was classified and not open to public or expert comment.

However, from public presentations of the outcomes of the research R&D 15-01 we know for sure that among the key findings of this research were: A) Acknowledgement of the fact that Russian agencies presently do not have information about scientifically valid environmental requirements for water level regulation in Lake Baikal and the monitoring system needed to verify any such requirement is not in place. B) Recognition of a pressing need to conduct complex research to be able forecast the environmental status of water and coastal ecosystems and develop conservation requirements for Lake Baikal based on outcomes of such research¹⁴.

State of conservation report submitted by Russia directly contradicts both findings of the R&D 15-01 listed above.

Statement that such “assessment” can be called “partially implemented EIA” is grossly inaccurate even by standards of Russian EIA Guidelines, let alone WHC/IUCN EA Guidance. EIA is well defined process with clear requirements to baseline information, assessment of impacts, use of precautionary principle, analysis of alternatives, disclosure of draft report and mandatory meaningful public consultations. None of this was sufficiently observed in 2015 R&D.

Russia’s SoC Report alludes to Water Resources Management Rules for the Irkutsk Reservoir issued in 1988, which makes us fear that EIA and Environmental flow assessment and management is being substituted by revival of those this outdated water-management rules. New draft regulation mentioned in text were repeatedly dismissed in 2013-14 due to failure to incorporate environmental and social concerns into those rules.

Statement that “completion of the EIA in its entirety does not seem appropriate” is not supported by valid evidence and anyway contradicts the Russia’s obligations under the Convention. Besides, it implicitly suggests that impacts on the OUV from

¹⁴ Dr. Mikhail Bolgov. Presentation of the Report on Outcomes of the Research R&D 15-01 commissioned by the Federal Agency for Water Resources in September 2015.

existing hydropower should not be part of the transboundary SEA either, without which objective SEA would be virtually impossible.

Therefore, in the light of new Decree #1667, it is extremely important to conduct full EIA of Lake Baikal water management regime and any draft Water Resources Management Rules for the Irkutsk Reservoir proposed to direct it in future.

10. Poor status of the Lake Baikal monitoring system

Russia also has failed to develop a property-wide ecological monitoring system in order to identify the scale and causes of negative changes and the responses required to preserve the ecological integrity of the property.

The State of Conservation Report submitted by Russia mechanically lists various not clearly interrelated monitoring projects development of which was funded from the State Budget. It does not explain whether holistic Lake ecosystem monitoring program exists, who implements it and where results could be seen. Continuing problems with Lake Baikal ecological monitoring can be illustrated by just three simple examples.

- Last year the Journal "Nature" published appeal of scientists from Irkutsk University protesting against discontinuation of state funding for monitoring observation of Baikal plankton that has been conducted continuously for 70+ years. The monitoring program was salvaged in 2017 thanks to donation by private foundation, but actual state funding for that has ceased and was not renewed.
- At the President Putin's meeting with Siberian Academy of Sciences on February 8, 2018 the Director of the Irkutsk-based Institute for System Dynamics Igor Bychkov stated: "We ask to focus on Lake Baikal monitoring based on new principles. Unfortunately, we can say that this monitoring largely remains a 19th or even 18th century type of monitoring.¹⁵" This conversation shows the real overall situation in Lake Baikal monitoring system.
- In Russian 2018 SoC on page 4 there is a passage on "Scientific ground environmental requirements to the regime of fluctuations in the level of the Irkutsk reservoir derived from monitoring information". To the best of our knowledge there is NO special monitoring program that is aimed at relating water level fluctuations to various ecological phenomena of the lake. Therefore all this passage is a disinformation and contains reference to a biased 2015 R&D report commissioned specifically to protect interests of the En+Group, rather than those of Lake Baikal World Heritage site. But as shown above, that very 2015 R&D report in its "conclusions" acknowledged absence of coherent monitoring system covering ecological consequences of water level fluctuation.

11. Reduction in Water Protection Zone and threat of reducing Core Zone of the World Heritage Site and other attempts to weaken protection

We have additional reasons for deep concern with:

- The Government of Russia issuing on March 26, 2018 a Decree #507-p **which more than 10-fold reduces water-protection zone for the Lake Baikal** delineated in 2015. Subsequent public discussion has shown that, although the Decree references special research conducted by the Institute of Geography in Irkutsk, in reality new delineation did not follow even those recommendations and likely has been undertaken to open large near-coast areas to development. Besides, massive easing of restrictions is not balanced with state funding and clear timeframe for undertaking necessary mitigation measures. For example, areas now open to construction of waste processing facilities are likely to be left without national funding for such construction, which will inevitably lead to further violations and cover-ups.
- The Government of Buryatia Republic welcomed new easements and its officials¹⁶ allegedly declared that the next objective is reduction of the "Central Ecological Zone" which is the core protected area of the Lake Baikal World Heritage Site.
- The Government of Russia issuing on March 26, 2018 a Decision #328 that makes changes to the "List of activities prohibited in Central Ecological Zone of Baikal Natural Area". It allows basting of rocks in water-protection zone for the purposes of public railroad construction. The new exception is added due to necessity to build additional branches of Baikal-Amur Railroad and possibly Trans-Siberian Railroad. The Decree does not reference results of any SEA/EIA on which such decision could be based.
- The Ministry of Agriculture and Food posting a draft decree intended to open for hunting the Baikal Seal population. (Although there are rumors this may be revoked due to massive public protest).

12. Possible 2018 Decisions

The Rivers without Boundaries Coalition recommends that the World Heritage Committee includes in its 2018 Decisions the following requirements:

For both Russia and Mongolia:

- Reiterate the request to the States Parties of the Russian Federation and Mongolia to jointly develop a transboundary SEA for any hydropower and water management projects which could potentially affect the property, taking into

¹⁵ en.kremlin.ru/events/president/transcripts/56825

¹⁶ e.g. Minister O.A. Magomedova on April 3, 2018 gave such interview on "News of Buryatia" Radio («Вести Бурятии» от 03 апреля 2018г.)

account any existing and planned projects on the territory of both countries, and requests both States Parties to ensure that the results of such transboundary SEA guide the elaboration of ESIA of any concrete hydropower and water management projects, including the planned Egiin Gol Hydro project, Shuren hydropower project, Orkhon river diversion project, renewal of the Water Resources Management Rules for the Irkutsk Reservoir, etc ;

For Mongolia:

- a) Welcome the fact that in September 2017 Mongolia cancelled tenders for ESIA and feasibility studies for Orkhon and Shuren dam projects, and ask Mongolia to delay any decisions on specific project planning until results of the basin-wide REA are reviewed and approved. Recommend that Mongolia engage in consultations with the WB and Russia to upgrade the REA to full-fledged SEA.
- b) Reiterate requirement to ensure that the renewed EIA developed for the Egiin Gol Project includes assessment of potential impacts not only on the hydrology, but also on the ecological processes and biodiversity of the property, and specifically on its OUV, and to provide the full EIA report to the World Heritage Centre. Request that Mongolia stops process of creation\funding of Egiin Gol Hydro project until all assessments, including SEA, REA and analysis of alternatives are completed and their results reviewed by IUCN\WHC.
- c) Develop an assessment of cumulative impacts of any planned dams and reservoirs in the Selenge river basin that may have an impact on the OUV and integrity of the property, including Egiin Gol Hydro, Shuren and Orkhon projects, and to provide this assessment to the World Heritage Centre,
- d) Not approve any of the projects until the above-mentioned EIAs and assessment of cumulative impacts have been reviewed by the World Heritage Centre and IUCN

For Russia:

- a) Urge the State Party of Russia to elaborate an Environmental Impact Assessment (EIA) of potential impacts of existing water use and management regulations and planned Water Resources Management Rules for the Irkutsk Reservoir on the Outstanding Universal Value (OUV) of the property, in line with IUCN's World Heritage Advice Note on Environmental Assessment, so that their effects on the property are fully understood;
- b) Reiterate the request to the State Party to develop a property-wide ecological monitoring system in order to identify the scale and causes of negative ecological changes and the responses required to preserve the ecological integrity of the property;
- c) Request the State Party of Russia to subject to EIA and legal analysis the Decree #507-p from March 26, 2018 on 10-fold decrease of water-protection zone.

Tanzania: Selous Game Reserve – Still Under Threat

Günter Wippel, uranium network



Tanzania's World Heritage Site Selous Game Reserve, Africa's largest protected area, with approx. 51.000 square kilometers, has been registered as "World Heritage in Danger" in 2014, and UNESCO retained Selous Game Reserve on the "In Danger"-list since then (2017 Decision: 41 COM 7A.17, <http://whc.unesco.org/en/decisions/6963>).

In a February 2017 statement, UNESCO explicitly expressed its concern about Tanzania's plan to build Stiegler's Gorge Dam in the central part of Selous Game Reserve (<https://whc.unesco.org/en/news/1785/>). In fact, at the UNESCO WHC Session 2017 in Krakow/Poland, the Tanzanian delegation had requested a postponement of the discussion of WHS Selous Game Reserve due to "new

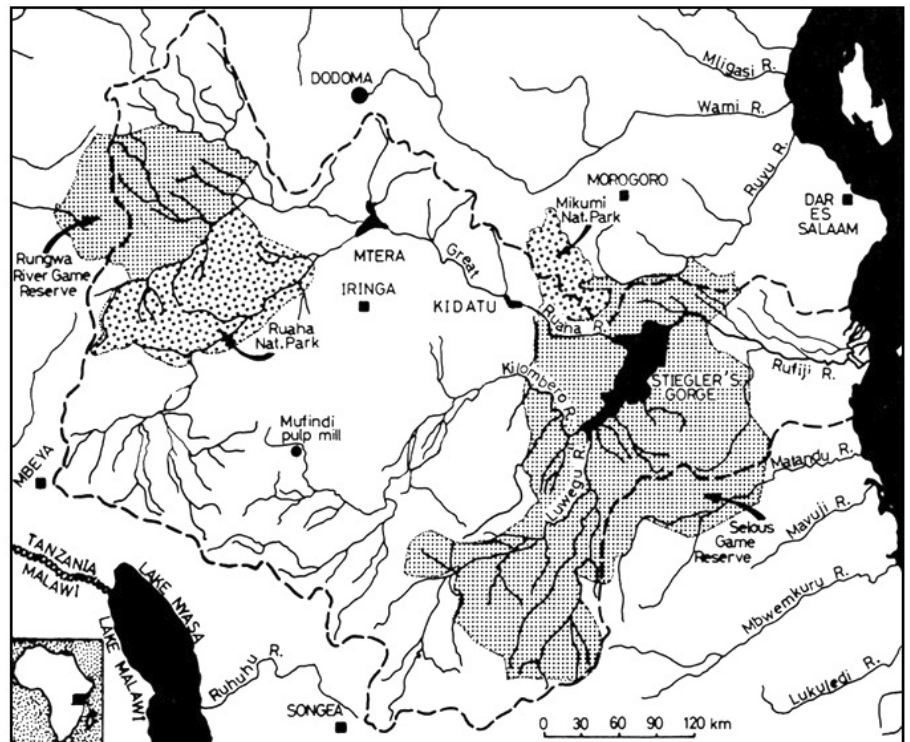


Fig. 2: Area of the planned Stiegler's Gorge Reservoir inside Selous Game Reserve.
Map: UN Food and Agriculture Organization



Fig. 1: Newsclip from The Guardian of 2 July 2017
<https://www.ippmedia.com/en/news/come-rain-or-shine-well-build-stieglers-project> Source:

facts"; the request had been granted by the Chair. The "new facts" were not so new at all: Tanzania's President Magufuli had already been cited in the media as saying on 1st July 2017 that "come rain, come sunshine, the project will be implemented as per plan" [1] – in the heart of Selous Game Reserve. Or, in a similar report, "we have decided to revive the Stiegler's Gorge project ... we will not listen to any environmental impact (concerns)." [2]

The timing of these statements, just days before the status of Selous Game Reserve would be discussed at the UNESCO WHC session, may be seen as a clear act of defiance towards the WHC.

Besides Stiegler's Gorge Dam, plans to build a uranium mine at Mkuju River got less attention. In 2012, the Government of Tanzania had motioned the WHC to excise the mine area in the Southwest of the Selous Game Reserve from the WHS. Sub-

stantial requests by the WHC have not been well complied with by the Government of Tanzania (as outlined in the 2017 Reactive Mission Report and by this author in the 2017 World Heritage Watch Report).

There is a lack of clarity around a number of issues with the Mkuju River Uranium Project

1. Change of Mining Method

The operator of Mkuju River Project, Mantra, majority-owned by Russian state nuclear energy corporation ROSATOM, had applied for a mining license with an ESIA based on open pit mining. In October 2016, Uranium One vice president and chief operations officer, Andrey Shutov, announced in the presence of Mantra Tanzania managing director, Fredrick Kibodya, that the company wants to employ in-situ recovery (ISR) at Mkuju River. [3] This intention had been announced previously at different occasions, as for example during a presentation by the operator to the IAEA in 2014. [4]

The use of ISR is in strong contradiction to the 2012 ESIA which rejects ISR, due “to a lack of confinement between impermeable layers.” Ongoing drillings have obviously not shown any different geology. Meanwhile, UNESCO WHC clearly stated that a change of the mining method would necessitate a new ESIA. To date, there is no indication that a new ESIA has been commissioned.

2. Changing Timeframe

On July 7, 2017, while the WHC session was still on-going and Selous Game Reserve was still to be discussed, ROSATOM surprisingly announced to suspend the project: “Russian state cor-

poration suspends \$1.2 billion uranium project in Tanzania” [5]—for at least three years, due to the depressed uranium market. Hence, in February and March 2018, equipment was removed from the site and the number of workers reduced.

3. Changes in Tanzania Mining Legislation

The same media report of July 2017 stated that ... “Another reason for this postponement is the major overhaul of Tanzania’s mining industry commissioned by the local authorities in March of this year. Recent bills, which aimed at providing the state with a greater share of revenue from the country’s natural resources, imposed fresh challenges for mining companies operating in Tanzania, including Rosatom.” [5]

4. Transport routes for the final product (‘yellowcake’)

Additional ambiguity arises around the transport route for the final product of the mine, generally referred to as ‘yellowcake’ (more or less pure uranium): while the company seems to prefer a route through Tunduru and Masasi to a port on Tanzania’s east coast (Mtwara, approx. 650 km), the Government of Tanzania prefers a route to Dar es Salaam (roughly 1000 km) and undertakes efforts to upgrade Dar es Salaam port to security Class 7 (license to handle radioactive materials).

The European Union, however, is currently (2018) funding research and a project to “organize an exercise simulating the transport of uranium ore concentrate from Tanzania to Namibia through Malawi and Zambia, and monitoring step by step the provisions applied in the individual countries, at the border crossings and assessing the interaction at the regional level.” [6]

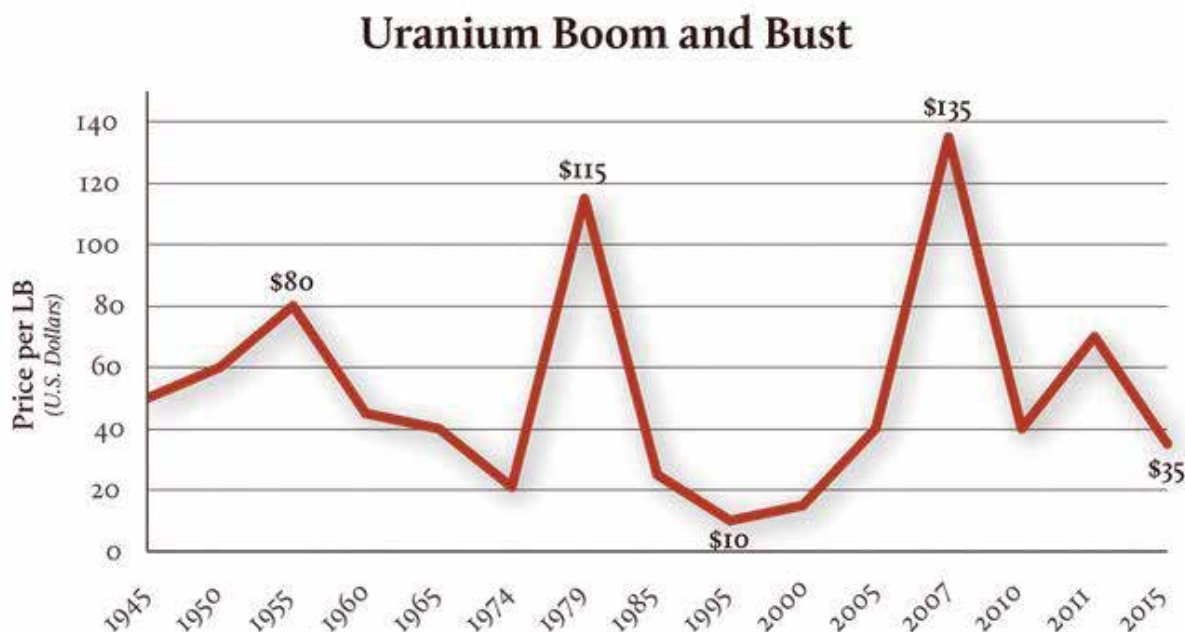


Fig. 3: Rise and Decline of the Price of Uranium 1945 – 2015.

Graphics: Grand Canyon Trust

This route measures a little less than 4000 km, six times the shortest connection (to Mtwara), passing through four countries as well as the Caprivi Game Park in Namibia – not an appropriate surrounding for uranium transports. In Namibia's Walvis Bay, uranium from Namibian mines such as Rössing is shipped, and now mothballed Kayalekera uranium mine in Malawi had used the same port for shipping their final product.

Impacts on the World Heritage site

Without reiterating the impacts of mining and the disposal of millions of tons of radioactive and toxic tailings (in case of an open-pit mine) that have been outlined previously, the major ambiguities around the project as well as the notorious boom-and-bust cycles of the uranium industry give rise to grave concerns:

- Will the Mkuju River Project ever start – and when?
- Will the Government of Tanzania comply with all 'conditions and recommendations' outlined by the UNESCO WHC in its decisions regarding the Selous Game Reserve since 2012?
- Which mining method will be used?
- Will there be a new ESIA – as requested by the UNESCO WHC - in case in-situ recovery (ISR) will be used?
- How will the company – wanting to use the ISR method – overcome the rejection of this method in the original (2012) ESIA, based on scientific analysis?
- By which route shall the final product (yellowcake) be transported?

The uranium industry has proven repeatedly to be a boom-and-bust industry; a rise of the price of uranium in the near future (as hoped for by Uranium One and other companies) may be followed by a similarly steep and sudden decline, as happened

before, leaving behind an abandoned mine, with no reclamation work done.

In Africa, as well as in other parts of the world, many uranium mine and mill sites, tailings and tailings ponds have been left behind without rehabilitation; in some cases, rehabilitation started 20-30 years later, and often at government expense.

Taking into account the climate of ambiguities around the Mkuju River Project, and the boom-and-bust character of the uranium industry, there is considerable risk that the project may be left behind with an abandoned mine and unreclaimed tailings and tailings ponds – which will pose a serious threat to the headwaters of the Rufiji River system and to the World Heritage Site for many years to come.

The mine area that was excised from the World Heritage Site Selous Game Reserve in 2012 "in an extraordinary and unique way" should instead be re-integrated in a similarly extraordinary way into the World Heritage site to ensure its continued protection.

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Position Paper Regarding Violations of Decision WHC 41COM 7B.25

National Coalition for Saving the Sundarbans (NCSS)



This document was submitted to the World Heritage Center and IUCN in April 2018 and is published here unabridged and unedited (the editors).

A. Large scale industrial and infrastructure developments are proceeding before the Strategic Environmental Assessment has been completed.

Paragraph 4 of the 41COM decision on The Sundarbans “...welcomes the State Party’s decision to carry out a Strategic Environmental Assessment (SEA) for the South-West region of Bangladesh, including the property, and requests the State Party to ensure that any large-scale industrial and/or infrastructure developments will not be allowed to proceed before the SEA has been completed....” Evidence of violation since 41COM:

1. In late July 2017, Prime Minister Hasina’s Energy Advisor, Tawfiq-e-Elahi Chowdhury stated that “UNESCO’s restriction [regarding large scale industries near the Sundarbans] is only applicable for “future” such projects, and that it doesn’t put the Rampal project on hold,”¹ and that “Unesco in its latest report said the construction work of the plant will continue. We will take mitigation measures based on the environmental assessment.”² Indeed, construction of the power plant at Rampal is proceeding. Appendix I below includes photographs of ongoing construction from August and September 2017.
2. On 24 August 2017, the High Court of Bangladesh directed the Government not to approve any industries within the 10 km buffer zone (“Ecological Critical Area”, ECA) of the Sundarbans Reserve Forest. However, that same month, the Government’s National Committee on the Environment approved 320 industrial projects in the ECA, including 186 existing projects, 118 projects that previously had preliminary clearance, 8 new LNG plants and 8 other medium and large scale industries.³ Environment and Forest Minister Anwar Hossain told the press, “As UNESCO now has no objection to the Rampal power plant, this will apply for other projects as well.”⁴ The Mongla Export Processing Zone (EPZ) is set to expand many times over, with a US\$ 21.5 million leather processing plant⁵ and hundreds of new industrial projects granted permits from central authorities.⁶ On 5 April 2018, the press reported that the Department of Environment reported 190 industries approved in the ECA to the High Court, including 154 currently operating and 24 red category, high-

ly-polluting industries.⁷ On 8 April 2018, the press reported that the red industries had been recategorized as green, avoiding environmental assessment requirements entirely.⁸

3. A massive complex of coal-fired power plants totaling 9000 MW is being constructed at Payra, roughly 40km east of the World Heritage site.⁹ These plants will send acid rain and mercury into the Sundarbans. Cooling water intake, coal ash disposal and effluent disposal will harm the *ilish* fishery that makes up 12% of the fish catch of Bangladesh¹⁰, and is one of the most important fish of the Sundarbans and Bay of Bengal.¹¹

B. An adequate management system for shipping to minimize negative impacts on the property, including from dredging, has not been put in place.

Paragraph 8 of the decision “...requests the State Party to ensure adequate provision of funding and human resources for the implementation of the plan once it is adopted, ... and requests furthermore the State Party to put in place a management system for shipping to minimize negative impacts on the property, including from associated activities such as dredging.” Evidence of violation since 41COM:

1. NCSS is unaware of any evidence of any improvements in the management systems related to shipping or dredging the minimize negative impacts to the property.
2. Ship traffic on the Passur River continues to increase without adequate regulations or disaster management systems in place.

C. Capital dredging of the Passur River has begun, though there is no publicly available Environmental Impact Assessment for dredging that includes an assessment of impacts on the World Heritage site.

Paragraph 9 of the decision “[r]eiterates its request to the State Party to undertake the Environmental Impact Assessment (EIA) for any future dredging of the Passur River to include an assessment of impacts on the Outstanding Universal Value (OUV) of the property, as requested by the Committee;”. Evidence of violation since 41COM:



Fig. 1: Meeting organized by the NCSS with the fishermen community at Dublar Chor, Sundarbans, in February 2018.

Photo: NCSS

1. NCSS is unaware of any EIA for dredging of the Passur River that includes an assessment of impacts on the Outstanding Universal Values (OUV) of the World Heritage site. Dredging the Passur River and Bay of Bengal channel could severely impact many of the species that contribute to the OUV of the Sundarbans, including Ganges and Irrawaddy dolphins.¹² These and other marine mammals (Indo-Pacific humpback dolphin, Indo-Pacific Bottle-nose dolphin, Spinner dolphin, Bryde's whale, and Minke whale) have been recently documented near the dredging corridor.¹³
2. In November 2017, the Executive Committee of the National Economic Council approved TK 712 crore (roughly US \$ 900,000) for capital dredging of the outer bar of the 131 kilometer-long Passur River shipping channel.¹⁴
3. In February 2018, NCSS documented capital dredging underway at Hiron Point, inside the Sundarbans South Sanctuary area of the World Heritage site. We also present a photograph and a document discussing the Mongla to Rampal dredging project. See Appendix II for photographs of the dredging vessels and the noted document.

D. There is no evidence that the environmental impacts of the Rampal plant will be assessed as part of the SEA. There are no adequate technological measures to mitigate these impacts.

Paragraph 10 of the decision "Also takes note of the mission's concerns about the likely environmental impacts of the Rampal coal-fired power plant on the property arising from air and

water pollution, a substantial increase in shipping and dredging, and additional removal of freshwater from an already increasingly saline environment and requests furthermore the State Party to ensure that these impacts are comprehensively assessed as part of the SEA and adequate technological measures are put in place to mitigate these impacts, in order to avoid damage to the OUV of the property;" Evidence of violation since 41COM:

1. NCSS is unaware of evidence that mitigation of pollutants from the power plant is being seriously considered as part of the terms of reference of the SEA. We are concerned that any mitigation measures eventually recommended by the SEA will be too late if the design of the plant is not fundamentally altered before construction. NCSS commissioned several independent expert reviews of the plant¹⁵, which identified three key mitigation measures for the plant:
 - a) No coal ash should ever be disposed of in this low-lying, seismically active region.¹⁶
 - b) State-of-the art emissions control technologies for SO₂, NOx, PM and mercury must be used: flue gas desulfurization (FGD), selective catalytic reduction (SCR), fabric filter/baghouse (FF), and activated carbon injection (ACI).¹⁷
 - c) Shipping of coal and coal ash on the Passur River should be avoided entirely.¹⁸

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Appendix



Fig 2a: Progress Construction Water trough by EPC Contractor trough ABM Water Company, Bangladesh



Fig 2b: Progress Temporary Roads & Drains by EPC-Contractor trough Bark Engineering & Construction, Bangladesh



Fig 3a: Progress Temporary Roads & Drains by EPC Contractor through Bark Engineering & Construction, Bangladesh

Fig 3b: Progress Porta Cabin by EPC Contractor through Bark Engineering & Construction, Bangladesh



Fig 4: Ongoing construction of the power plant at Rampal, August and September 2017



Fig. 5: Capital dredging equipment near Hiron Point on the Passur River, 27 February 2018.



Capital dredging equipment on the Passur River between Mongla and Rampal, 1st April 2018.



Capital dredging equipment near Hiron Point on the Passur River, 27 February 2018.

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APPENDIX-V

Basic Information of Proposed Project

1. Name of the Project	: Capital Dredging in Pussur Channel from Mongla Port to Rampal Power Plant
2. Sponsoring Ministry	: Ministry of Shipping
3. Executing Agency	: Mongla Port Authority
4. Objective of the Project	: Main objective of the project is to achieve adequate depth in the Pussur Channel from Jetty no. 9 of Mongla Port to 13 km. upstream to ensure smooth and safe movement of vessel carrying imported coal for power plant of Bangladesh-India Freindship Company Limited (BIFPCL) at Rampal, Bagerhat.
5. Estimated Cost of the Project	: I) Total: Tk. 16650.00 lac (Cash F.E. 7466.80) II) GOB: Tk. 16650.00 lac (Cash F.E. 7466.80) III) P.A. : -
6. Proposed Implementation period	: i) Date of commencement: July, 2016 ii) Date of completion: June 2018
7. Source of Financing	: GOB
8. Main Items of project	: i. Dredging works (38.81 lac cum.) ii. Construction of Dyke (3.28 lac cum.) iii. Procurement of Pickup- 1no. iv. Procurement of Motor cycle-3nos. v. Procurement of Speed Boat (1no.)
9. Cost Benefit Analysis	: (a) Net Present Value (NPV) (i) Financial : 4237.32 (ii) Economic : 9710.01 (b) Benefit-Cost Ratio (BCR) (i) Financial : 1.27 (ii) Economic : 1.63 (c) Internal Rate of Return (IRR) (i) Financial : 25.34% (ii) Economic : 31.47%

Document of 1 April, 2018: "Capital Dredging in Pussur Channel from Mongla Port to Rampal Power Plant".

Resisting Intrusive Tourism Developments in the Tasmanian Wilderness

Geoff Law and Vica Bayley, the Wilderness Society (Australia)



Fig. 1: Fragile alpine environment within the Walls of Jerusalem National Park, a part of the Tasmanian Wilderness subject to proposals to construct buildings for commercial tourism.

Photo: Rob Blakers

The Tasmanian Wilderness is a large World Heritage property of extraordinary diversity. Its habitats range from lowland rainforests to treeless alpine meadows, and from saltwater lagoons to glacial lakes. Cultural attributes attest to the survival of the Tasmanian Aboriginal people through the last ice age and range from shell-middens to deposits of stone tools and wallaby bones that have remained undisturbed in limestone caves for over 20,000 years. These attributes contribute to the property meeting seven of the 10 World Heritage criteria.

The Tasmanian Wilderness is a place where people can experience great seclusion from the clamour of modern society. This quality has motivated people to defend the Tasmanian Wilderness from logging, mining and dam construction over the course decades. However, just when many people thought that the area was safe, another threat has emerged.

In 2014, a new Tasmanian government declared that it would 'open up' the island's national parks to commercial tourism.

It invited the private sector to submit proposals to develop infrastructure within the Tasmanian Wilderness (Tasmania 2014). Over the coming months there was an avalanche of effusive media reports about proposed lodges, walking tracks, helicopter pads, bike trails, boats, roads and a cable car all aimed at conveying thousands of paying customers to remote locations. The government simultaneously attempted to downgrade the status of wilderness within the World Heritage property, including by changing its name and management zones.

Conservationists were aghast. The government claimed that everything would be done in a 'sensitive' manner but it was clear that it had no intention of properly assessing the environmental impacts of the proposed developments. The award-winning 1999 management plan for the Tasmanian Wilderness was watered down in 2016. Instead of evaluating proposals through a statutory process in which comments from the public would be invited, the government boasted of cutting 'green tape' and fast-tracking developments.

Of key concern was the protection of wilderness, 'an area that is of sufficient size, remoteness and naturalness to enable the long-term integrity of its natural systems, diversity and processes, the maintenance of cultural landscapes, and the provision of a wilderness recreational experience'. The construction of new infrastructure in remote areas is one of the key threats to wilderness.

The ensuing public outcry was effective. Wilderness was to be retained in the name of the property and in the management plan's zoning. The World Heritage Committee and a Reactive Monitoring Mission recommended strict criteria to apply to tourism developments (Jaeger & Sand 2016; UNESCO 2015). In early 2016, the State Party said it would implement these recommendations (Australia 2016).



Fig. 2: The Wilderness Society briefs the IUCN / ICOMOS mission of 2015. The Mission recommended strict criteria for tourism developments within the Tasmanian Wilderness. Photo: Amanda Sully

However, the Tasmanian Government has continued to encourage large-scale tourism development within the Tasmanian Wilderness. It has approved intrusive developments after perfunctory, confidential environmental assessments. It has not disclosed the environmental conditions or lease arrangements that apply to approved developments. And it has used taxpayers' funds to subsidise developments even when such developments violate the management plan for the World Heritage property. Some examples of this are as follows:

Lake Geeves / Federation Peak: This spectacular glaciated landscape is in the heart of the wilderness. Federation Peak is a prized destination for adventurers because of its remoteness. Lake Geeves is characterised by its inaccessibility and pristine rainforest. Nevertheless the State Party has given \$70,000 to a group of business people to develop a proposal for commercial lodges here (Abetz 2017) – in direct violation of the area's management plan.

Maydena Bike Park: Major earthworks to construct over 100 km of mountain-bike trails on very steep slopes through wet forest were approved after an undisclosed assessment by the government. No public comment was sought. The government has provided a grant of \$800,000 to enable the second stage of this development to occur (Hodgman 2018), despite a spate of serious injuries to riders.

South Coast Track Commercial Accommodation: This proposal was discussed in last year's WHW report (Bayley 2017). Seven major lodges (misleadingly labelled 'huts') have been permitted along the remote, spectacular South Coast Track. In February 2018, the government allocated \$3 million to this private development on public land within a World Heritage Area (Abetz 2018), despite no assessment of the project's impacts.

Lake Malbena Commercial Accommodation and Helicopter Access: This project is at the most advanced stage of all proposals currently under consideration. The Tasmanian Government has quietly approved substantial elements of the project after an in-house assessment. Fortunately, the proposal has been referred to the national government and must also undergo a review under Australia's Environment Protection and Biodiversity Conservation (EPBC) Act (Australia 2018). The proposal involves accommodation next to a historic hut on a tiny island in a remote mountain lake fringed by ancient pines. Patrons would be ferried to and from the site by helicopters. The Tasmanian Government's approval of the project is controversial for the following reasons:

- A low-level assessment was carried out without public input.
- The Tasmanian Government has accepted the proponent's description of the development as a 'standing camp' even though it explicitly involves permanent buildings, constructed of 'timber and steel' elsewhere in the documentation (Australia 2018).
- New buildings are not permitted in this particular area even under the downgraded zoning for Lake Malbena that applies in the new management plan (Tasmania 2016). The Government has therefore ignored its own management plan by approving the project.
- The 'self-reliant recreation zone' within which the proposal occurs is designed to protect the area's seclusion and tranquillity, qualities clearly inconsistent with the proposed access by helicopters.

- It appears that no assessment of the development's impact on wilderness has been carried out.

Consideration of the project under the EPBC Act will therefore be a major test of Australia's legal regime for World Heritage properties. Will the Australian Government rubber-stamp the Tasmanian Government's approval despite the obvious flaws? Or will it diligently fulfil its international obligation to protect the wilderness character of a World Heritage property from market-driven ad hoc developments?

The same questions apply to an increasing multitude of such developments. Table 1 lists the proposed developments in the Tasmanian Wilderness that have arisen since 2014; they involve more than 20 new buildings with associated access such as helipads and tracks. And new proposals are breathlessly publicised

in the Tasmanian media every month or two. Clearly, the cumulative impact of such a barrage of new buildings, tracks and helipads would affect not just the tranquillity of the World Heritage property, but also its ecological integrity.

The process for assessing such developments has demonstrated the following fundamental flaws:

- Environmental assessments have almost universally been kept away from public scrutiny.
- The criteria established by government (in response to the World Heritage Committee's request of 2015) have been used as a box-ticking exercise of issues to consider rather than as benchmarks to be satisfied before approval is granted.

Table 1: Proposed tourism developments within the Tasmanian Wilderness – as of May 2018

PROJECT	BRIEF	INFRASTRUCTURE	COMMENT
South Coast Track Huts Walk	6 new 'huts' along the South Coast Track, 1400 walkers per year	6 separate accommodation installations and associated board-walks, tracks, helipads, water tanks, toilets. Potential rerouting of South Coast Track.	Would commercialise one of the world's great coastal wilderness walks and degrade wilderness character. A ban on hut development (1999 Management Plan) has been lifted.
Walls of Jerusalem Lodge Walk	Lodge (on private land) and unspecified number of 'huts' (in national park)	New buildings and associated infrastructure (access tracks, helipads, toilet block etc)	Major new infrastructure development in remote country. Helicopter servicing with associated impact on serenity. Inconsistent with long-term recreation plan for the area.
Overland Track Experience	Second set of commercial 'huts' on the Overland Track	Up to 6 major structures and associated helipads, water supply/treatment works, access tracks	Some building locations appear facilitated via purpose-specific excisions from the Wilderness Zone.
Cradle Base Camp Experience	Lodge constructed at remote Lake Rodway	1 accommodation installation and associated infrastructure (access track, helipad, water treatment)	This project appears facilitated by an excision from the Wilderness Zone, now zoned as Recreation.
Frenchmans Cap Walk	4-day 'camp-based' walk	Unspecified number of prefab structures and boardwalks	Major potential impact if in alpine area. Significant additional infrastructure and major local impact if constructed at new sites. Inconsistent with draft planning vision for area.
Halls Island / Lake Malbena	'Luxury standing camp' accessed by helicopter	At least four permanent buildings; jet-ties; surfaced tracks; helipad	The previous (1999) Wilderness Zoning of Lake Malbena has been changed in 2016 providing for buildings and helicopter access.
Federation Peak / Lake Geeves	Buildings and track to enable luxury access to a very remote lake	Up to 3 buildings, including helipads, and new high-grade walking track	Totally inconsistent with the Management Plan due to being situated inside Wilderness Zone. Major impacts on remoteness, seclusion and ecological integrity.
Maydena Bike Park	Long downhill runs on mountain-bike trails	Approximately 100 km of mountain-bike trails. Use of pre-existing gravel roads and building.	Major earthworks on steep slopes in wet forest. Stage one already constructed after confidential in-house assessment.
Cradle Valley Cable Car	A long cableway into the World Heritage property	Cableway of approx. 8 km with terminus buildings and pylons	Major earthworks and visual intrusion into a beautiful valley
Meander Falls Road	A new road to a remote waterfall	Major earthworks of about 10 km into a rugged, rainforested valley	Inconsistent with 2016 Management Plan and would have massive impact on rainforests and sub-alpine environment. Massive scarring of the landscape.
Mt Field NP pods	Accommodation 'pods' within national park	Little information provided	Further impacts on Tasmania's national-park system

- There has been a minimalist approach to considering environmental impacts. Wilderness is often ignored, as are impacts on seclusion and tranquillity.
- Public funds to subsidise projects have been pledged by governments prior to the assessment of impacts.
- Critical planning tools, such as management plans, are seen as obstacles to be overcome rather than as a rule book.
- Projects are proceeding well in advance of the promised 'Tourism Master Plan' that was requested by the World Heritage Committee.
- International bodies such as the World Heritage Committee and IUCN are kept at bay by the State Party with reassuring undertakings while the spirit of these undertakings is incrementally but relentlessly violated.

The public discussion of these issues occurs in an environment contaminated by the pro-development rhetoric associated with extractive industries. The word 'sensitive' is repeated so compulsively by government that it is eventually drained of all meaning. Intrusive infrastructure is described in the most anodyne terms – the word 'hut' is used to describe major accommodation installations that house 50 people. For buildings where the word 'hut' is appropriate, the word 'camp' is substituted. Disingenuous attempts are made to downplay the most obvious of impacts. Those who criticise proposed developments within the World Heritage property are labelled 'anti-everything', 'elitist' or 'ideological'.

The World Heritage Committee has shown that it is prepared to take a stand when uncontrolled developments threaten OUV or integrity. In recent high-profile cases, it has insisted on the establishment of a proper assessment process for proposed developments. In inscribing the Historic Centre of Vienna on the List of World Heritage in Danger, the Committee lamented the threats posed by the current 'planning controls' (41 COM 7B.42). In canvassing the removal of the endangered Maritime Mercantile City of Liverpool from the World Heritage List itself, the Committee deplored the approvals given to major developments and called for proper planning (41 COM 7A.22).

The Tasmanian Wilderness is a long way from reaching the plight of Liverpool and Vienna. However, that is due to the award-winning planning system that applied from 1999 to 2014. Over the last four years, that regime has been systematically dismantled. Swift action is required to stop the rot. Australian conservationists would welcome calls by IUCN and the Committee for the State Party to honour its 2016 undertakings for the Tasmanian Wilderness by:

- Ruling out all developments inconsistent with the management plan;
- Desisting from providing public funds to commercial developments before their impacts have been adequately and transparently assessed;
- Applying strict criteria for the protection of OUV as benchmarks that proponents are obliged to meet;
- Ensuring that transparency and public participation apply in all environmental assessments;
- Ensuring that environmental conditions that apply to approved developments are legally enforceable.

In a world where natural precincts are often overrun with roads, lodges, gondolas, airstrips, noisy over-flights, jet boats, helicopters and intrusive tracks, the Tasmanian Wilderness epitomises ecological integrity and tranquillity. But with an army of developers poised to invade this World Heritage property, concerted international action is required to protect these irreplaceable qualities.

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III. World Heritage Properties and Indigenous Peoples

Grand Canyon National Park Under Attack by Uranium Mining Plans

Günter Wippel, uranium network

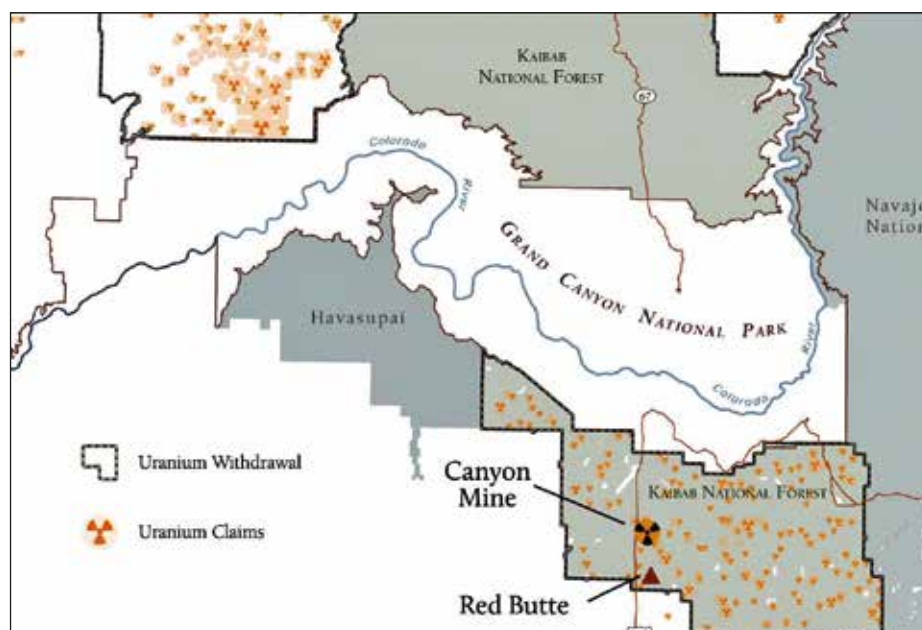


Fig. 1: Grand Canyon National Park, bordered by uranium claims and Indian Reservations. Map: Stephanie Smith / Grand Canyon Trust

Grand Canyon National Park has been inscribed as a World Heritage site in 1979, under criterions viii, ix and x of the UNESCO:

“The Grand Canyon is among the earth’s greatest on-going geological spectacles. Its vastness is stunning, and the evidence it reveals about the earth’s history is invaluable. The 1.5-kilometer (0.9 mile) deep gorge ranges in width from 500 m to 30 km (0.3 mile to 18.6 miles). It twists and turns 445 km (276.5 miles) and was formed during 6 million years of geologic activity and erosion by the Colorado River on the upraised earth’s crust. (...) Horizontal strata exposed in the canyon retrace geological history over 2 billion years and represent the four major geologic eras.” “There are also prehistoric traces of human adaptation to a particularly harsh environment.” [1]

“Over 2,000 prehistoric Indian ruins have been recorded in the park. (...) The ruins contain evidence that the earliest human inhabitants of the canyon were gatherers and hunters. (...) ... discovery of split-twigg figurines ... Radioacarbon dating has shown some of the figurines to be 4,000 years old.” [2]

Since the 1950s, uranium mining had been a major operation in the Southwest US, leaving a legacy of unreclaimed ura-

nium mines, mills, tailings and tailings ponds, some of them currently under reclamation.

In the mid-1980ies, a uranium mine was developed close to Red Butte: the Canyon Mine, approx. six miles outside the World Heritage Site, south of Grand Canyon village. The mine site is outside the World Heritage site, located in Kaibab National Forest which is under administration of the US Forest Service. [3]

Although the mine site is not on the World Heritage site territory, there is major risk that radioactive contamination may reach the WHS

- either through flash foods typical for the region, via the Havasu Canyon leading to the Grand Canyon (many flash floods occurred, e.g. in 1993, 2008, 2012, 2013, 2015, 2017)
- or via a groundwater aquifer (Redwall Muav aquifer) which extends from the mine area towards Havasu Canyon; the area is ‘karst’, and groundwater movement is not very well understood.



Fig. 2: The Canyon Mine, with Red Butte rising in the background, on the Coconino Plateau.
Photo: Blake McCord

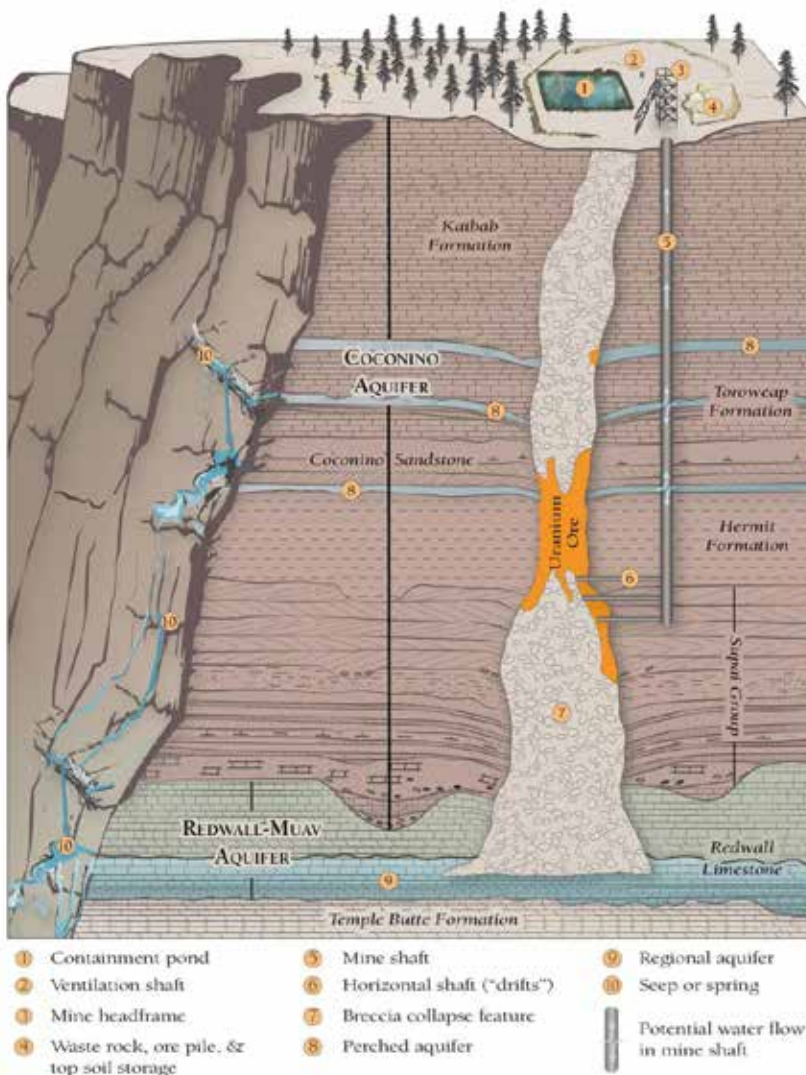
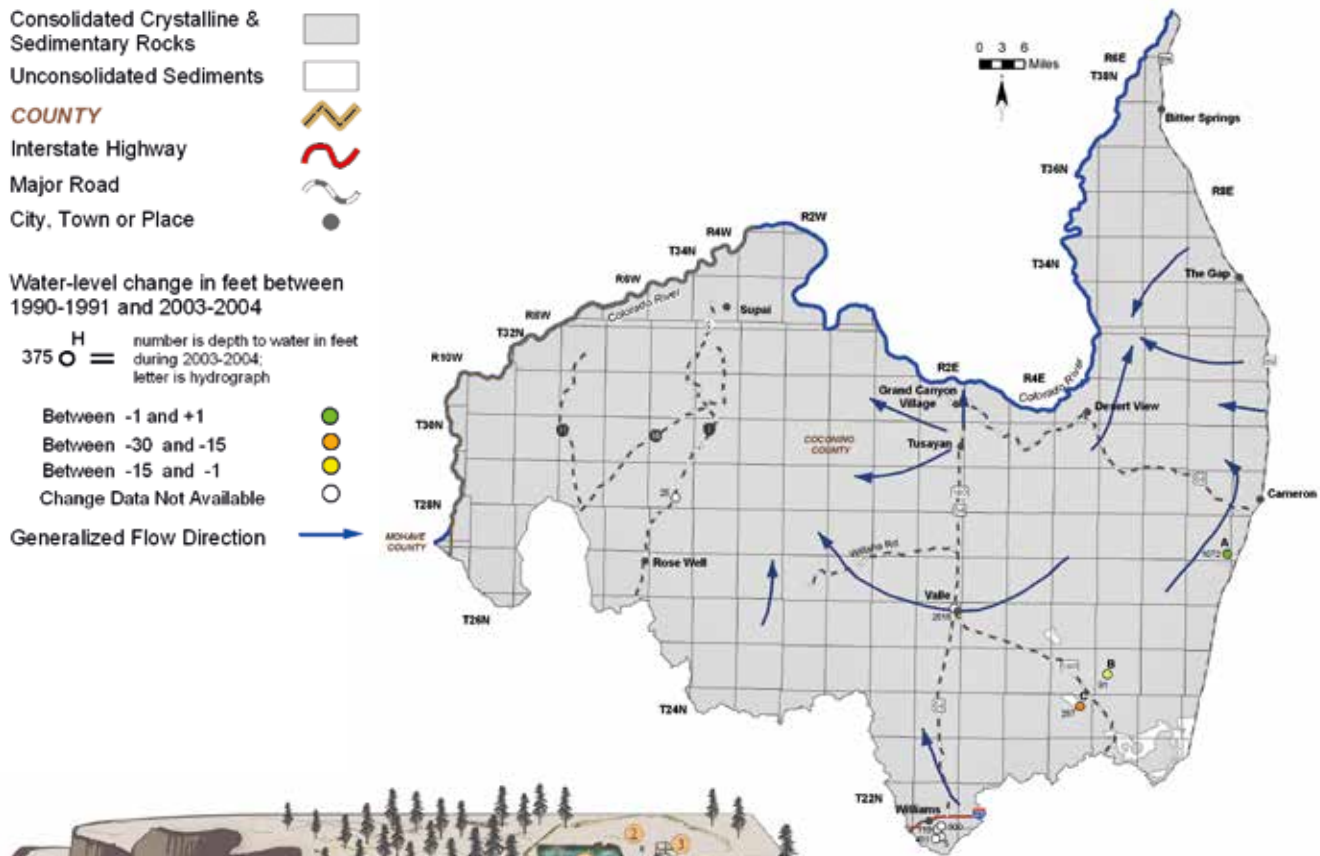


Fig. 4: Uranium deposits, mining and groundwater around the Canyon Mine.

Graphic: Stephanie Smith / Grand Canyon Trust

According to a USGS study of 2016 [4], groundwater discharges into Havasu Creek; this groundwater may get contaminated by uranium mining of a geological formation called "breccia pipes", as in the Canyon Mine – and then reach Havasu Creek and finally the Grand Canyon. The Havasupai Tribe, a recognized Indian tribe inhabiting the Havasu Canyon, had opposed the development of the mine for this reason.

The Canyon Mine project came to a halt in 1991 due to a decline of the price of uranium. To this point in time, no uranium ore had been mined. The company, Energy Fuels Nuclear went bankrupt later on. Ownership of the mine changed repeatedly until Canyon Mine ended up with Energy Fuels Inc., founded in 2006 (with no connections except for the similarity of name, to former Energy Fuels Nuclear). A sudden rise of the spot market price of uranium in 2007/2008 had sparked new interest in uranium mining.

In 2012, under Obama administration, Secretary of State Ken Salazar withdrew an area around Grand Canyon for 20 years from all new uranium developments ("withdrawal" or, colloquially called 'ban') which was welcomed

by the UNESCO WHC [WHC Decision 40 COM 7B.104]. The uranium ban, however, does not apply to pre-existing mines and claims such as Canyon Mine as well as several mines on standby and to claims; these mines might commence production at short notice once the price of uranium rises. In 2016, activities at Canyon Mine were restarted, until in March 2017, an ‘unexpected influx of water’ brought sinking of the shaft to another halt.

The UNESCO WHC opinion and 2016 Decision

UNESCO WHC expressed in 2016 serious concerns, stating, among other issues: “It should be noted in particular that the *EIA for the Canyon Mine project*, which was temporarily closed in 2013, *dates back to 1986. It is therefore crucial that a new EIA, including an assessment of the potential impact on the OUV, is conducted before operation of this project is permitted to resume.* [WHC/16/40.COM/7B.Add, underline not in the original text]

The concerns are reflected in the 2016 WHC Decision [40 COM 7B.104]:

Requests the State Party to ensure that Environmental Impact Assessments (EIA) are completed for the proposed uranium mining developments, particularly prior to resuming operations for the Canyon Mine project, temporarily closed in 2013, which should include a specific assessment of the impact on the OUV, in line with IUCN’s World Heritage Advice Note on Environmental Assessment;

No action of the State Party are known implementing this request. The WHC’s Decision and recommendations were not taken into account.



Fig. 5: Havasupai tribe members and supporters stand outside the the Ninth Circuit Court of Appeals in San Francisco, California Dec. 15. 2016 where they filed two law suits to protect their water rights. Photo: Chris Jordan-Bloch/EarthJustice

In December 2017, the Court of Appeals decided that the 1986 EIA – by then, 31 year old – was good enough to proceed with

uranium mining in 2018, rejecting a complaint by the Havasupai Tribe, the Grand Canyon Trust, the Center for Biological Diversity and the Sierra Club, basically on technical-legal reasons. [5]

It has to be noted that the 1986 EIA for the Canyon Mine contains no evaluation of (potential) impacts of the mine on the World Heritage Site Grand Canyon, no consideration of the World Heritage status of nearby Grand Canyon is made in the 1986 EIA at all, although the site had been inscribed to the World Heritage already in 1979.

In addition, more uranium mines in the area pose a danger to World Heritage Site Grand Canyon; in items no. 4 and 5 of the 2016 decision, the WHC ... “*Notes with significant concern* that there are 11 consented uranium mining proposals in the area surrounding the property that are exempt from the 20-year withdrawal” and “*Reiterates its position* that mineral exploration or exploitation is incompatible with World Heritage status ...”. No action by the State Party is known concerning other mining projects and uranium claims in the area of the World Heritage site or affecting it.

The Ban, the Companies, US National Security and Latest Developments

The Court of Appeals – although giving Canyon Mine a green light – upheld in its December 2017 decision the ban for new uranium mining projects in the “withdrawal zone”. However, in mid-January 2018, Energy Fuels and Ur-Energy filed a petition, claiming “Our country cannot afford to depend on foreign sources – particularly Russia, and those in its sphere of influence, and China – for the element that provides the backbone of our nuclear deterrent, powers the ships and submarines of America’s nuclear Navy, and supplies 20% of the nation’s electricity.” [6]

The companies allege that US dependency on uranium imports from abroad would jeopardize National Security. They would like to have “25 percent of the U.S. market [reserved] for domestic uranium” – which then would be mined by US companies. This rather unprecedented move – if accepted by the administration – would grant US uranium companies a 25% market share; companies would then not need to compete with foreign companies – which might artificially spark a new uranium boom in the US – and put the Grand Canyon World Heritage site at additional risk.

Moreover, companies push hard to overthrow the uranium ban: In mid-March 2018, “two groups – the American Exploration and Mining Association (AEMA) and the National Mining Association – have submitted a new request to the Supreme Court, asking them to review the mining ban, enacted in 2012, that bans all uranium mining claims on the lands surrounding the national monument.” [7]



Fig. 6: The village of Supai – as all of Havasu Canyon – relies completely on Havasu Creek for its water supply.

Photo: Stephan Doempke

The (uranium) mining industry is aggressively pushing forward to mine uranium in close vicinity of the Grand Canyon, potentially affecting the World Heritage Site. The State Party is neither taking WHC concerns serious nor implementing any of the WHC 2016 Decision's recommendations.

Uranium exploitation bears the risk to deprive the Havasupai Tribe of one their basic means of existence - water. This would amount to an infringement of their rights under the UN Declaration of the Rights of Indigenous Peoples and / or to a violation of the UN Covenant on Economic, Social and Cultural Rights.

At a hearing of the House Committee on Natural Resources, Havasupai Tribal Council member Carletta Tilousi testified on Dec. 12, 2017:

"The Havasupai People are very concerned about our main fresh water source, Havasu Creek, which flows right through the middle of our village. Havasu Creek is created by the Red Wall Mauve Aquifer, which supplies water for us and downstream cities towns like Kingman, Phoenix, Tucson, and Las Vegas. The largest uranium ore deposits in the United States are all located above the Red Wall Mauve Aquifer; therefore, the cancellation of the Withdrawal will open up the uranium ore located on Kaibab Forest Service Lands to uranium companies.

The spring water flows directly from the Red Wall Mauve Aquifer that lies directly beneath the plateau and peaks south of Grand Canyon. Opening up this area to uranium and other mining would be tragic and an environmental nightmare.

What happens to that Red Wall Muave Aquifer and springs happens to the Havasupai People. I am here to tell you that uranium contamination in the aquifer will not only poison my family, my Tribe, ancestral lands, and me, but also millions of people living downstream.

The Tribe has great reason to be concerned. Thousands of uranium mining claims, like so many vials of poison, threaten those lands that are the source of our water. Scientists do not yet fully understand how mining uranium will affect the groundwaters and watershed." [9]

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Undermining Cultural Values: An Indigenous Perspective on the Khangchendzonga Nomination



Tseten Lepcha and Gyatso Lepcha,
Affected Citizens of Teesta, and Shweta Wagh

The Khangchendzonga National Park (KNP) was recently inscribed on the UNESCO World Heritage list¹ as a Mixed² site which recognises both its natural and associative cultural values. As the indigenous people of the region, we Lepchas have initially welcomed the nomination since we believed that the inscription would empower local communities in the region, provide international acknowledgement and recognition to our sacred landscape and cultural practices, strengthen our rights over forests and landscapes that we inhabit, prevent destructive development activity and the ongoing desecration of our sacred sites.



Fig 1: Khangchendzonga: the sacred summit as seen from Sikkim.

Photo: Helena India Travels

However our experience of the process of nomination, an examination of the final Nomination Dossier and recent development activities and government interventions in the region has cast serious doubts regarding the inscription. The World Heritage listing undermines the very values that it claims to protect.

Background

The core area of the Kanchenjunga Biosphere Reserve³, designated in 2000, coincides with the protected area of the KNP. Its buffer and transition zones include human inhabited landscapes and settlements that lie outside the protected natural core. The physical landscape spans across four altitudinal regions⁴ and consists of a diversity of landscapes and habitats ranging from snowfields, glacial lakes, alpine forests and meadows to deep gorges and densely vegetated valleys which contain the tributaries and basins of the Rangit and Teesta rivers. At lower elevations within the buffer and transition zones of the Reserve, a wide range of landscape types including agrarian landscapes and indigenous settlements are interspersed with natural habitats. These are sustained through traditional practices of communities making the region a repository of bio-cultural diversity.



Fig 2: Human inhabited landscapes and indigenous settlements in the transition zone of the Biosphere Reserve.

Photo: sundarsy / www.indiamike.com

Mount Khangchendzonga is revered by inhabitants of the region as their guardian deity, and a mythical sacred landscape encompasses the sacred summit and its adjacencies. The Lepchas have a cosmology intricately interwoven with the land.

1 The Khangchendzonga National Park (also known as the Kanchenjunga National Park) was inscribed on the World Heritage list on July 17, 2016, as a Mixed Heritage site.

2 As per the Operational Guidelines for the World Heritage Convention, Properties shall be considered as "Mixed Cultural and Natural heritage" if they satisfy a part or the whole of the definitions of both cultural and natural heritage laid out in Articles 1 and 2 of the Convention.

3 The Kanchenjunga Biosphere reserve (KBR) was designated in the year 2000. Its core Zone coincides with the boundary of the National Park having an area of 1,784 sq.km. An additional area of 825.92 km² constitutes its buffer zone. The transition zone forms the outermost zone of the biosphere reserve, and includes areas with settlements, agriculture, managed forests and other uses. The buffer and transition zones of the Biosphere Reserve coincide with those of the World Heritage Site.

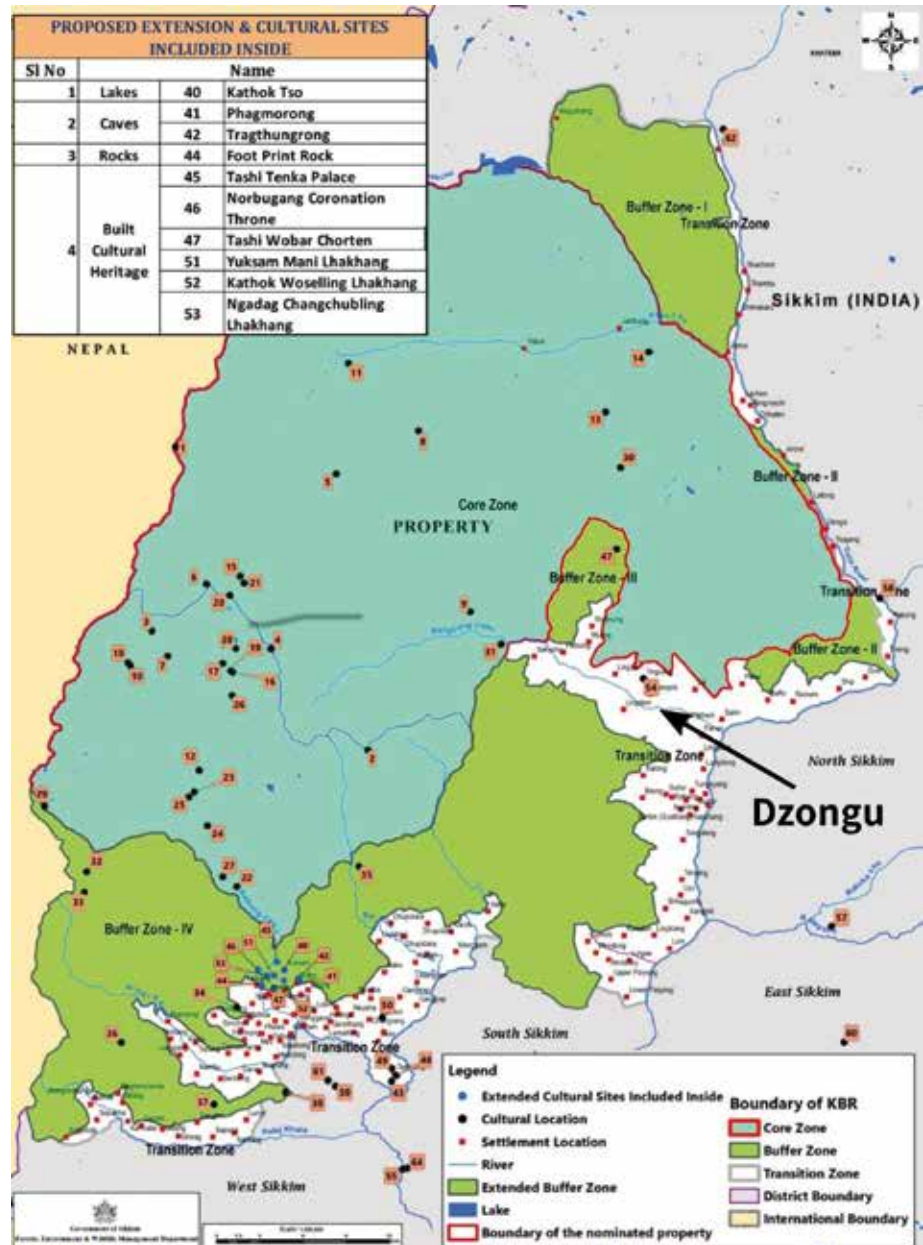
4 The landscape spans across four altitudinal / eco-climatic regions, including the trans-Himalayan, alpine, temperate and the subtropical.

Fig 3: Boundaries of the Nominated Property and Kanchenjunga Biosphere Reserve – core, buffer and transition zones. Map: Government of Sikkim

With the establishment of the Buddhist Kingdom in the seventeenth century, indigenous conceptions of the landscape were assimilated into a “Buddhist rendition of Sikkim’s sacred geography as a Beyul (sbas yul) or sacred hidden land” (Balicki 2008, p. 367). Buddhist and Shamanic world views, deeply ingrained in local belief systems, have their basis in a reverence for nature. Practices and rituals that involve the dedication of sacred groves, rivers, caves, lakes, springs, forests and landscapes to ancestral spirits or deities, embody the culture and identities of our communities (Aurora 2006, p. 65).

Nature-culture divide: contested boundaries of the “mixed” site

The National Park had earlier been included in the Tentative List for World Heritage Sites in India under the Natural Heritage category. This categorisation was contested during a stakeholder workshop⁵ in 2012 by representatives of local communities who believed that it undermined cultural values that were integral to the landscape and justified its inclusion under the Mixed Heritage category. On reviewing their recommendation, the Advisory Committee on World Heritage Matters (ACWHM) proposed a revision of the nomination dossier with the site renamed as the ‘Kanchendzonga Sacred Landscape’ to be nominated under the ‘mixed heritage category’ with an extension of boundaries to include the buffer and transition zones of the Kanchenjunga Biosphere Reserve.



⁵ The stakeholder workshops conducted in consultation with the Advisory Committee on World Heritage Matters (ACWHM) under the aegis of the Ministry of Culture, were aimed towards arriving at a “Representative, Balanced and Credible” tentative list that was “thematically and geographically more complete and equitable in the context of South Asia Region.” Representatives who attended the East Zone Workshop for the revision of the World Heritage list organized in Calcutta in June 2012, included individuals and representatives from N.G.O’s from West and North Sikkim. Some of the participating organisations in this process included the Moyal Liang trust – West Sikkim, The Kanchendzonga Conservation Committee (KCC) –Yuksam, and Mutanchi Lom Al Shezum an NGO from the region of Dzongu in North Sikkim.

Subsequently in the revised Nomination Dossier submitted by the State party, the category was changed from a Natural to a Mixed Site, but the boundary of the National Park was continued to be retained as the boundary of the nominated property (Wagh 2017). The buffer zone was the same as the buffer zone of the Biosphere Reserve, but the transitional zone had been excluded from the buffer zone of the nominated property (ICOMOS 2016). Thus although associative values of communities in relation to the Natural Site were acknowledged in the Nomination Dossier, the boundaries of the designated site did not encompass human inhabited areas that lay beyond the domain of the protected natural core and constituted a significant part of the sacred geography (ibid). We are concerned about the exclusion of important indigenous landscapes and sacred sites from the protected core area of the property.

In its interim report ICOMOS had asked the State Party to expand the buffer zone to include man-made features bearing

Fig 4: A series of run-of-the-river dams proposed along the river Teesta and its tributaries.

Map: Tseten Lepcha, Gyatso Lepcha, Shweta Wagh

cultural significance located in the transition zone, following which the State party carried out a stakeholder consultation and agreed to include ten sites in the Yuksam region (ICOMOS 2016). The State party chose to limit these areas, citing ownership and management related concerns. It also pointed out that during stakeholder consultations which were a part of the nomination process, certain communities were apprehensive about the extension of boundaries due to developmental concerns (ICOMOS 2016). ICOMOS considered that a number of sites including Tashiding monastery and its setting and the Dzongu valley, although not included in the nominated property or the buffer zone, needed to be protected and managed (ICOMOS 2016).

Recent reports point out that some of the stakeholder consultations were staged as they did not encourage independent discussions and also that key stakeholders have been excluded from these consultations (Brar 2017). Members of our community in Dzongu feel disappointed and let down as they were neither consulted nor were their views considered during the entire process of nomination. On our part we had made several attempts to define and reinstate our own conceptions of the sacred landscape, and have actually demanded the inclusion of our sacred rivers and indigenous landscapes as a part of the nominated property, to ensure their survival and protection. From our perspective, the region of Dzongu, which is the heart of Lepcha culture, should have been an integral part of the nominated property. One of the residents of Dzongu even noted that “It seems as though stories of our cultural practices, myths and folklore have simply been mentioned in the dossier to ensure KNP’s eligibility and to fulfil certain criteria for designation under the Mixed category. This does nothing to ensure the protection of critical or vulnerable landscapes and sacred sites that lay beyond its boundaries.”

Sikkims vanishing rivers: ongoing destruction and impending threats

During the past decade, our region has been faced with an onslaught of destructive development as the Sikkim State Government has proposed and attempted to execute a series of 27 dams over the river Teesta⁶ in order to harness the hydro-power



potential of the river and its tributaries (Parvaiz 2017). Since we consider the river as our lifeline and an indispensable part of our sacred landscape, we have been at the forefront of the struggle⁷ to prevent the destruction and desecration of our sacred river. Our sustained resistance along with other Buddhist communities in the region eventually led to the scrapping of four dams which had been proposed within the National Park and on its peripheries. Even today we continue with our battle⁸ to prevent the last remaining free flowing stretches of our sacred river in Dzongu from being diverted underground.

Of the two hydel power projects proposed within the Lepcha reserve that lie in the Transition Zone, one is barely half a kilometre away from the Buffer Zone of the Park. The sacred river Rongyoung originates in the Khangchendzonga range and flows through the deep gorges and densely forested valleys of Dzongu before it meets the Teesta. We are striving to keep the river flowing free as after death our souls will travel all the way up the Rongyoung to their final resting place in the mountains.

Dzongu, the Lepcha indigenous reserve, is a steep mountainous forested terrain where less than 40% of the land is human habitat. It occupies the buffer and transition zones of the Biosphere Reserve. Here we practice sustainable agro-forestry and

⁶ The River Teesta which has its origins in the Khangchendzonga range in the Himalayas, flows through the region of Sikkim. It has historically sustained a landscape of diverse ecosystems which support a range of livelihoods and is thus considered to be the lifeline of the State of Sikkim.

⁷ See also <https://savedzongu.wordpress.com>, and <http://weepingsikkim.blogspot.in/>

⁸ See also <http://www.actsikkim.com/teesta.html>

mountain based farming, share an intimate relation and have a history of coexistence with nature. The word Lepcha originates from the union of two words in the Lepcha language, lep and tsa which means 'to belong to place' and we also refer to themselves as Rong - or people of the ravine (Aurora: 2006: 65) Our conception of Máyel Lyáng is a land of hidden paradise, inhabited by immortal beings that cater to their needs and well-being.

Due to its unique geographical location and altitude ranging from 400 to 5000 mts, Dzongu has been described by experts as one of the richest landscapes among the 'Himalayan biodiversity hotspots', besides being designated as an 'Important Bird Area.' It is home to approximately 287 species of birds and about 312 species of butterflies. The rivers in the area form a rich ecosystem, a lifeline for a range of terrestrial and aquatic fauna. A local resident pointed out that "destroying the home of these beautiful and rare creatures will simply defeat the purpose of the heritage nomination." He also mentioned that when he scanned through the Nomination Dossier, he realised that although lakes have been listed as sacred sites, rivers as a part of the sacred landscape have barely been mentioned⁹. This according to him is surprising and questionable, as Sikkim's sacred rivers play a significant role in both Shamanic and Buddhist ritual practices and ceremonies. One cannot help but wonder if this deliberate omission has something to do with the dams.

Although the dams in Sikkim were presented to the people as a harbinger of development and progress, they have had an irreversible and devastating impact on the mountain ecology, made the landscape more precarious and vulnerable to landslides and flash floods, resulted in migrant influx to remote areas and also severed social relations within communities. Tunnels of the hydro power projects are also affecting the sub-sur-

face flow of water as a result of which springs have either run dry or have moved to a different location. This is impacting on our lives. We depend on these springs for our daily domestic consumption, use and irrigation.

After WH inscription the situation in Dzongu seems to have worsened. Despite unanimous resolutions against dams in Dzongu being passed by local villagers, these projects still remain on the government's agenda. A recent case of dynamite explosion at the work site of the 300 MW Panan hydro power project in Dzongu led to the erosion of a hillside, the destruction of houses in an upstream village, and the formation of an artificial dam blocking the course of a free flowing river at Mamtam in upper Dzongu. Since then the people living above the lake have been facing a humanitarian crisis as no vehicle



Fig 6: Dams have had a devastating and irreversible impact on rivers and the fragile mountain ecology.
Photo: Shweta Wagh



Fig 5: Public protest against the proposed Teesta Stage IV Project Hydro Power Project in Lower Dzongu.
Photo: Gyatso Lepcha

⁹ Interestingly the Places of Worship Special provisions Act of 1991 which lists sacred peaks, rocks, caves, stupas lakes and hot springs as the most sacred Buddhist places of worship in Sikkim also does not recognise or protect sacred rivers.

can pass through. Even though the High Court has ordered for the draining of the lake, the State Government wants to keep the lake for tourism purposes. This reflects the State's agenda to commodify and commercialise sacred sites without respecting for the needs or sentiments of the local people.¹⁰

Contrary to our initial belief that the World Heritage Status would be a huge protection against ongoing destructive activities, confining the boundary of the property to the protected area of the National Park has made it easy for the State Government to continue with several previously planned projects. An Eco-Sensitive Zone which had been proposed around the Park would have provided legal protection to indigenous landscapes. But its extent in Dzongu has now been reduced from 10 kms to a mere 25 mts from the boundary of the Park.

Conclusion

Although the inscription of the Protected Natural Site under the Mixed Category has been justified on account of values associated with the natural element¹¹ rather than the presence of material cultural evidence, it seems like an opportunity missed as it could have gone a long way in protecting our sacred landscapes that presently lay outside the protected area network. The State Party is deliberately undermining critical tangible and intangible values of the landscape in order to suit its own developmental agenda. If the listing was meant to be a recognition of "deep cultural meanings and sacred significance" of the landscape as the dossier suggests, then why is it that indigenous sacred landscapes which are integral to the site have been marginalised and excluded from the core.

India's "first Mixed Heritage Nomination" seems to have mainly benefited government officials and the tourism industry while undermining the rights of the Lepcha communities and our role as custodians of the landscape. Unless the designation can ensure the protection of our lands, forests and rivers and safeguard our cultural beliefs and practices which are on the verge of extinction, the World Heritage Inscription as it stands today is meaningless.

10 Several years ago as part of a Government led ecotourism initiative in Dzongu, an ancient grove of sacred trees which sheltered a sacred spring within a stream bed, were cut down to construct public bathhouses for tourists.

11 "Associative Cultural Landscape" is a category under Cultural landscapes as defined in the Operational Guidelines for the implementation of the World Heritage Convention. 'The inclusion of such landscapes on the World Heritage List is justifiable by virtue of the powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence, which may be insignificant or even absent' (World Heritage Committee, 2008).

Recommendations

In order to safeguard the integrity of the site, we therefore recommend that UNESCO should:

1. Ask the State Party to extend the core area of the Inscribed Property to include the buffer and transition zones of the Biosphere reserve.
2. Demand that all dams in Dzongu and the buffer and transition Zones of the Biosphere Reserve be scrapped and the destruction due to existing projects be reversed.
3. Insist that the boundaries of the Eco-Sensitive Zone around the National Park be increased once again to at least a distance of 10 kms.
4. Make sure that the rights of Indigenous communities are safeguarded and they are involved in all decision-making processes that affect their sacred sites and landscapes.
5. Ask the State Party to mention and emphasize Sacred Rivers in the nomination dossier with recommendations for their protection and management, which includes keeping rivers free flowing and to keeping the remaining stretches of dammed rivers as free flowing.

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Water Security at the Honghe Hani Rice Terrace System: An Overlooked Issue

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Rice terrace systems worldwide are known for their rich ecological and traditional value. These systems play critical roles in shaping the landscape and in soil and water conservation. Water, specifically, is central to the existence of these terrace systems and has a complex and dynamic role to play in the local socio-ecological system. However most of these systems face certain common challenges, mainly due to climate change along with other technological and evolutionary changes and associated demographic changes brought about due to migration (UNESCO/CLT/WHC 2013).

Their sustainable existence requires a thorough understanding and assessment of the entire system, the existing linkages and associated complexities, particularly in relation to the natural resources. The concept of water security is useful in relating the different components of the system being considered, as it describes the capacity of a population to safeguard sustainable access to adequate quantities of water by preserving ecosystems in a climate of peace and political stability (United Nations University Institute for Water Environment and Health 2013).

The Honghe Hani rice terrace system, inscribed as a UNESCO World Heritage site in 2013, lies in the Yuanyang county of Yunnan province in Southwestern China and has been in existence

for about 1,300 years (Jiao et al, 2012). The region containing the rice terraces is characterized by high rainfall and a subtropical monsoon climate, and is home to six major ethnic groups, having rich traditional ecological knowledge (TEK) and natural resource management principles. Despite having a well-developed four-step cascade water distribution system, ditch and canal system directing flow through various landscape elements, availability of water has become varied, with shortages being experienced in dry seasons, and increase in disparities over water access in the core, buffer and downstream areas.



Fig. 2: Many Hani still wear their traditional dress during every-day activities.

Photo: Barant Adventures



Research Setting and Methods

Notably the presence of mines below the rice terrace areas are impacting the water availability in the downstream areas due to groundwater withdrawals. The development of tourism in the area has been carried out with a view that tourism development together with poverty reduction would be a good way forward

Fig. 1: The Honghe Hani Rice Terraces.

Photo: Lin Yiguang, Xinhua / Getty Images

for overall regional development (Gu et al 2012, pp. 55). Its inclusion in the UNESCO World Heritage list has made the area undergo significant internal and external changes, with Jiao et al. (2012) reporting that the average number of tourists visiting the Yuanyang County from 2006-2008 was 441,862 per year, according to the Yuanyang Tourism Office.

Considering all the above factors, research was conducted by selecting three villages in the upstream reaches, lying within the protected heritage area and two villages in the downstream reaches, all of which were representative of the topographical and demographic characteristics of the surrounding area and were accessible due to the presence of transportation infrastructure.

Hydrological analysis was done by delineating watersheds based on the selection of villages (see Herath et al. 2015). Review of current literature and national laws was conducted. Key informant Interviews were conducted with the village leaders (5), aided by structured guided questionnaires and also open ended interviews. Purposive sampling was utilised in this case. The questionnaire survey was also conducted for the farmers (9 upstream and 8 downstream) and restaurant owners (4 upstream). Snowballing technique was utilised for sampling in this case.

Results and Discussion

The Water System: The important components of the water system are surface runoff that is generated in the form of

streams, originating from the forests on the mountain top, alongwith the water that infiltrates and comes out as springs in different locations and mist. In the upstream reaches the surface runoff is channeled into the villages through an extensive network of channels and ditches or ponds. The water from these ponds augment the supply during the dry periods. According to Jiao et al (2012), farmers build artificial channels along contour lines in forested regions to catch surface flows. There are deeper and shallow springs that emerge in certain locations, water from which is diverted through pipes into storage tanks to meet the major domestic and livestock water requirements of the villages.

Calculation of water demand was done considering four major demand sectors, domestic, agriculture, livestock and tourism (specific to upstream watershed). The water scarcity index (Rws) was used to estimate the trends in water scarcity, and it was found that in the upstream watershed there were indications of low to moderate scarcity in February-April, with the index values ranging from 0.1-0.2, and the same can be seen in the downstream reaches. Similar analysis done under future rainfall conditions (RCP 8.5) showed that wet and dry conditions are set to become more pronounced. The contribution of groundwater to the overall water availability is high in both watersheds, and the storage in the upstream ponds also helps in supplementing the water supply during dry periods.

Perceptions of water scarcity: Responses obtained through field interviews indicated that water shortage is a reality. One of the farmers who owns a restaurant in the Quanzhuzhuang village

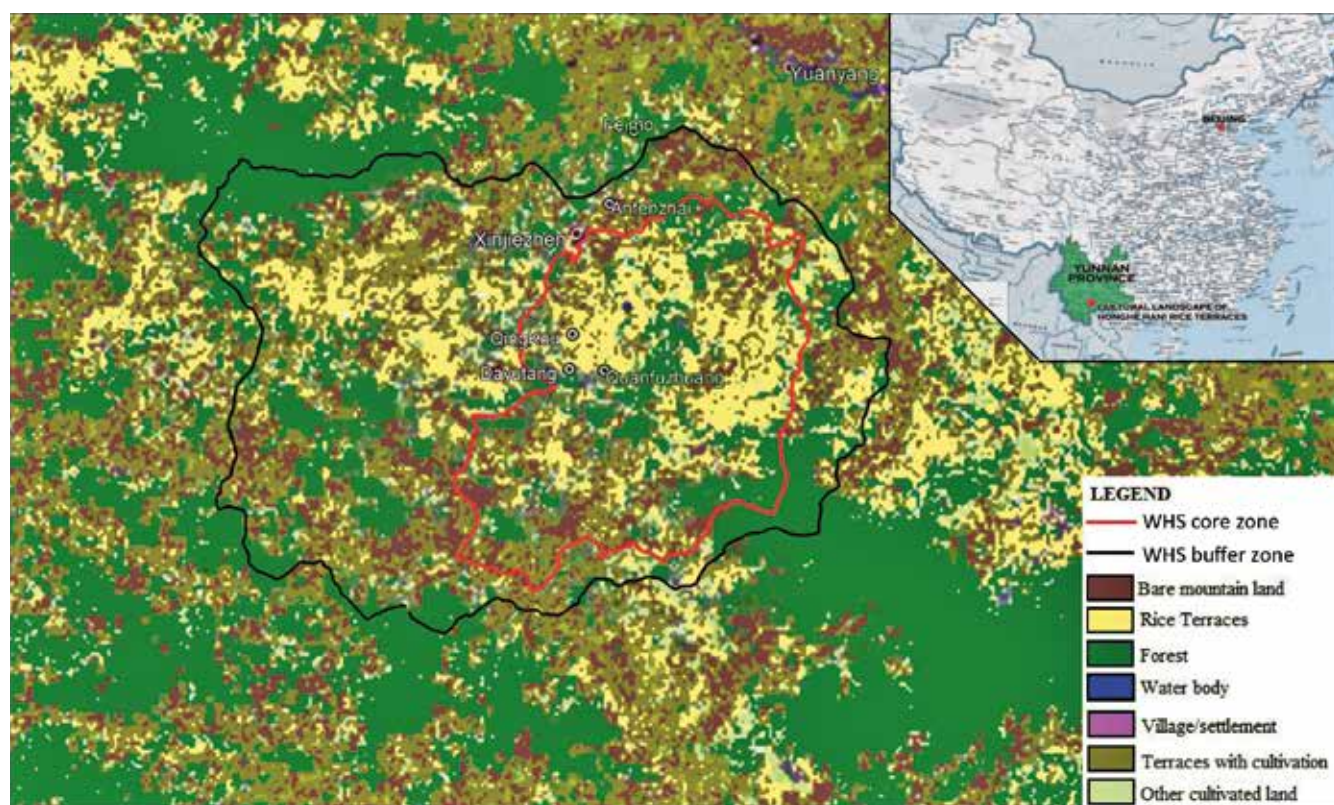


Fig. 3: Land use map of Honghe Hani.

Map: Arachana Jayaraman / Martin Lenk

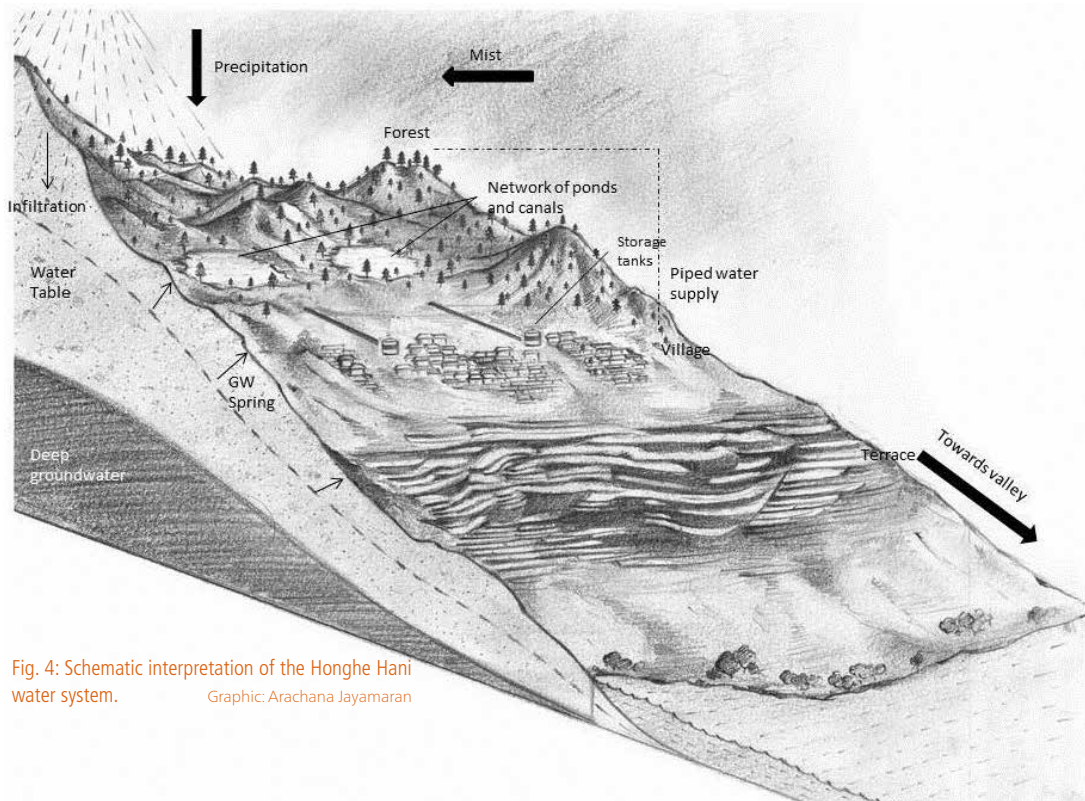


Fig. 4: Schematic interpretation of the Honghe Hani water system.
Graphic: Arachana Jayamaran

said that during March-April there is shortage of water felt on the ground” and another respondent also acknowledged the shortage of water and attributed it to the development of tourism in the area, as they utilize a lot of water, and he felt that “planting trees and building tanks to store water” could be the possible steps taken to avoid shortage”. In the downstream areas, water shortage was more evident. The village leader of the Feimo village attributed the shortage to “no spring water, no wells, high mountains and mining in the downstream areas”. The results obtained from the hydrological analysis are corroborated by these responses to show that the shortage of water is an issue. Also, reconciling water availability with access to that water stands out as an important issue that needs to be addressed.

Water Management system: According to the respondents, the traditional water collection and management system was no longer being followed. Most upstream respondents stressed that farmers themselves were in charge of the water resources in their area, and allocation and dispute redressal was done through negotiations. In contrast to this, the downstream areas depended mostly on the Government agencies and the water supply company for supply and management, often paying for piped water supply. The management approach has become more top-down and involving figures of authority in the areas downstream where the shortage of water is being felt more.

Policy and Governance Implications and Threats: Reviewing the national Water Law and the newly introduced Environment Protection Law of the People’s Republic of China reveals two main aspects:

a) The ownership of water resources by the State provides them with the right to abstract and utilize water. However in complex systems, there is a risk of overlapping rights, which is being seen on the field, including headwater and groundwater rights. This also brings the importance of clarity regarding the licensing system for groundwater, wherein some villages are paying to obtain spring water while others don’t.

b) The authorities involved in the management of water are many and exist on many levels. Article 3 mentions the State Council as the owner of the resources on behalf of the State. Within the council itself, the administrative department for water resources has been mentioned for the licensing system, the water allocation quotas are being managed by the administrative departments for the different trades considered, while groundwater falls under the local people’s Governments. The site itself is managed by the State Administration of Cultural Heritage.

Relooking the boundaries of jurisdiction needs to be considered for effective decision-making, apart from the challenges of overlapping responsibilities. Apart from these threats, the general demographics in the area are being affected by outmigration and tourism.

Discussion and Recommendations

It is clear that the terrace system has challenges that are unique, and sustenance of the system needs an integrated strategy. Sourcing from the National Water Law, the presence of a basin level strategy would ideally allow administrative officials better

decision-making. A nodal authority could help reduce discrepancies brought in due to overlapping rights and boundaries of jurisdiction. The more micro scale challenges can be resolved by utilizing platforms for greater engagement among the farmers themselves. Some of the systems which exist in other parts of the country that could be replicated here include setting up of Water User Associations or WUAs, like the ones existing in northern parts of China (Huang et al., 2010).

Livelihoods are an important pillar of the system too, that need to be addressed. A focused livelihoods assessment of the area, with improved estimation of migration statistics and assessment of the level of knowledge among the younger generation needs to be done. This information would serve as the backdrop for decision-making and negotiations in the area. These factors, aided by structural measures to improve access and the use of decision-making tools like the water scarcity index can contribute to ensuring the water security of the system and its overall sustainability.

Conclusion

The research recognised social threats in the area, and perceptions of water scarcity were seen to emerge from the respondents, with stark differences in the upstream and downstream reaches, which corroborated the earlier identified hydrological threats. The other major threats that emerged were related to

water rights and abstraction, especially groundwater, and reconciling availability and access. Integrated management on the macro scale was examined, including the establishment of a basin level nodal authority, while suggestions for platforms for exchange of information between farmers has also been made. The value of traditional practices needs to be realized, and methods for their incorporation need to be looked into, in tune with the current needs of the area.

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The Rice Terraces of the Philippine Cordilleras and the Ifugao Landscape at Risk



Llenel de Castro and Liezel Aldiano, Save the Ifugao Terraces Movement

The Rice Terraces of the Philippine Cordilleras was inscribed in the UNESCO World Heritage List in 1995. It is a living cultural landscape of five exemplary rice terraces clusters - Bangaan and Batad (both in Banaue), Mayoyao, Hapao (Hungduan) and Nagacadan (Kiangan) - in the province of Ifugao, northern Philippines. Inscribed under criteria III, IV, and V, the rice terraces represent not just the Ifugao agricultural system, but the intangible knowledge systems and cosmology of the Ifugao Indigenous people as well. At the time it was inscribed, the Rice Terraces of the Philippine Cordilleras was the first property included in the cultural landscape category of the World Heritage List (1).

In the Philippines, the Banaue rice terraces has been recognized as a National Cultural Treasure since 1973 by virtue of a presidential declaration (2). In 2004, the Ifugao Rice Terraces was also recognized by the UN FAO (United Nations Food and Agriculture Organization) as a Globally Important Agricultural Heritage System (GIAHS) due to its manifestation of clear and strong culture-nature linkages as well as complex engineering systems that have enabled the Ifugao to utilize the mountainous terrain for bountiful food production for centuries (3). The Hudhud chants of the Ifugao has also been recognized as an Intangible Cultural Heritage of Humanity, proclaimed in 2001 and formally inscribed in 2008. The

over 200 chants, practiced during the rice sowing season, harvest time, at funeral wakes, and other rituals, contain much of the beliefs and practices of the Ifugao (4).

In between the UNESCO WHS and the UNFAO GIAHS inscriptions however, the Rice Terraces of the Philippine Cordilleras



Fig. 1: Traditionally-managed muyong in Nagacadan, Kiangan.

Fig. 2: Muyong conversion to commercial vegetable production causing long term negative effects to watershed.

Photos by Marlon Martin

was placed on the List of World Heritage Sites in danger in 2001. This was due to natural calamities and a fast-changing socio-cultural environment that saw high levels of out-migration and poor intergenerational knowledge transfer. Immediately, local and international agencies, both public and private, collaborated to restore the damage that the rice terraces had incurred since their nomination. The rise in support and publicity given to the plight of the rice terraces led to its removal from the List of World Heritage Sites in Danger in 2012 (5). Unfortunately, six years later, the same problems still continue to plague the rice terraces and threaten its sustainability for the next generations.



Fig. 3: One of the proposed dam sites that could affect water supply to the rice terraces.
Fig. 4: Unregulated quarrying leading to environmental pollution.

Water is essential to support the Ifugao rice terraces and its community's basic needs. The rice planted by the Ifugao must be submerged in the water all-year round, giving water a vital role in the community's agricultural development, especially in the life of the Ifugao people. Traditionally, the sources of water and the irrigation system have been sustainably managed and maintained through the Muyong System. Now widely recognized as an ideal forest management strategy, the muyong, mountain-top family-owned forests, serve as watersheds, absorbing rain and draining them into streams that provide water to the rice terraces and surrounding communities (6).

In recent times however, changes in climate, unregulated harvesting of wood, and the privatization of water sources have threatened the Muyong System. The changing climate has not just decreased the amount of rainwater stored in the muyong, but has also caused changes in the flora and fauna found in the forests and rice terraces, and has contributed to landslides and the collapse of terrace walls (7).

The changing rain patterns have also decreased the rice yield, hence also directly affecting the farmers' economic gains. Unregulated harvesting of wood to supply the furniture and handicraft industry outside of Ifugao, as well as the conversion of forest land into agricultural or residential/commercial land, have also significantly reduced the forest cover (8). In terms of privatization of water sources, the government has turned over control of state-owned large dams to private corporations and has encouraged the construction of new privately-owned hydro-power projects as well. The change in ownership and management of these water resources significantly affect not just the source of water for the terraces, but also the whole ecosystem which the rice terraces are part of.

Photos by Marlon Martin

Water and the Ifugao Agricultural System

The traditional knowledge of the Ifugao is a complex system of agriculture, resource management, labor relations, religion, and social organization played out together. Therefore, it is important for conservation projects, initiatives, and agencies to look at the entirety of the terraces as a representation of an interrelated system, instead of isolating rice production, as is frequently done, when discussing Ifugao traditional agriculture.

Recommendations

To counter these threats to the Rice Terraces of the Philippine Cordilleras, we recommend that the government should take an even more active stance in the conservation not just of the rice terraces, but of the culture that has produced and sustained it. In addition to supporting the crop yield and varieties, ensuring the economic viability of the rice production, there should be government control and responsibility over utilizing and developing water resources for the benefit of the majority.



Figs. 5 and 6: Unsustainable infrastructure construction in Banaue. Banaue is the jump-off point for most tours to the Rice Terraces, therefore bearing the brunt of tourism-influenced developments.

Photos by Marlon Martin

Ironically, the country's national policies tend to be a tool for water privatization and exploitation of the Philippine water resources. Such policies include the National Water Resources Act and the National Renewable Energy Act that facilitate the entry and domination of private businesses in the water sector. These policies paved the way to the influx of controversial hydropower projects that privatized and monopolized water resources against the will of the local communities (9). In addition, the implementation of proper consultations and negotiations as mandated by the Indigenous Peoples Rights Act, have frequently been bypassed, to the detriment of truly inclusive development (10).

We also recommend more focus to be put on supporting the indigenous knowledge systems of the Ifugao. Much has been written about the poor intergenerational transfer of indigenous knowledge and outward migration of the youth with agriculture not being seen as a profitable career. Many well-meaning programs designed to get more people, youth especially, involved in the preservation of the Ifugao culture have been put in place. These programs however, need to be expanded and implemented on a wider scale with more institutional support, instead of being one-off projects.

Lastly, we recognize that the ever-increasing popularity of the Rice Terraces as a tourist destination and the accompanying commercialization of Ifugao culture that it has brought has been both a boon and a bane. While the influx of tourists brings a much-appreciated economic boost to the region,

the effect of this boost is rarely felt by the farmers who build and maintain the terraces. Likewise, although the popularization of Ifugao culture has contributed to the continued practice of traditional crafts such as weaving and woodcarving, this has also led to innumerable instances of cultural appropriation and exoticization of various aspects of Ifugao culture. Much still needs to be done in terms of the communication of Ifugao knowledge systems and values not just to future generations of Ifugao, but also to visitors and other consumers of Ifugao culture.

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IV. Cultural Landscapes and Mixed Sites

The Lake District – A Cultural Landscape Under Threat

Fritz Groothues, Save the Lake District Campaign



The Lake District's key attributes of Outstanding Universal Value are centred around three themes: its beauty and harmony, the fusion between the landscape and human activity, and the role the Lake District played in the development of landscape conservation movements nationally and internationally.

This report describes how all three aspects are being systematically damaged with the consent of the body entrusted with the protection of the Lake District, the Lake District National Park Authority (LDNPA). The focus is on two so-called green lanes, U5001 and U5006, ancient unsealed tracks with presumed but not proven vehicular rights. (see Fig. 1)

These tracks run across a stretch of land between Coniston and Little Langdale which one of the founders and leading figures of the Lake District conservation movement, the author, land-owner and sheep breeder Beatrix Potter, left to the National Trust and the nation, on the condition that it be preserved for future generations, together with the sheep farms located on it. Beatrix Potter was drawn to this space by its spectacular wild beauty and tranquillity, and by the need she saw to protect a traditional agro-pastoral way of life against the onslaught of mass tourism. Her efforts contributed greatly to the development of the National Trust, the largest conservation organisation in the UK.

The two tracks in question were rarely, if at all, used by recreational motor vehicles before 2001. They are shown on maps from 1844 onwards as minor tracks, in clear contrast to the roads leading up to them. In tourist guides from the mid-1880s they appear as routes for walking excursions. In the 20th century they were not sealed with tarmac because there was no demand from local residents or tourists to use them with motor vehicles.

An invasion of off-road motor vehicles

In 2001 the Lake District National Park Authority introduced a scheme of voluntary restraint for recreational motor vehicle users on green lanes, the Hierarchy of Trail Routes (HOTR), proposing a maximum number of four 4x4s and eight motorcycles travelling in one group. Major flaws in the scheme are that it is unenforceable and sets no overall limit. The HOTR was devised

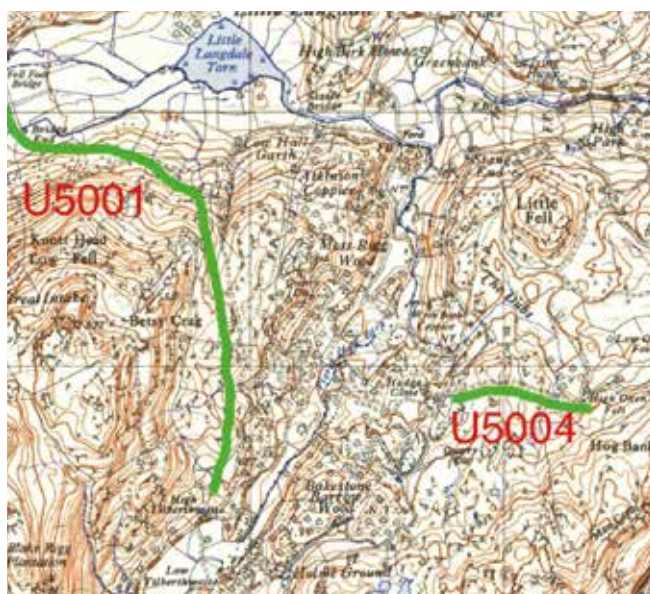


Fig. 1: Off-Road Routes U5001 and U5006 and their location in the Lake District National Park.
Map: Save the Lake District Campaign



Fig. 2: Beatrix Potter's legacy in the Lake District. Photo: Save the Lake District Campaign

in co-operation with motor organisations, without the involvement of residents, farmers, horse riders or walkers.

After the LDNPA erected signs advertising the HOTR in 2001, the number of recreational motor vehicles on the High Oxenfell-Hodge Close and High Tilberthwaite-Bridge End tracks rose steadily. Commercial companies started offering tours in 4x4 convoys on these routes. At the same time, off-road enthusiasts began posting material on social networks, praising this area as an ideal destination to practice off-road driving skills.

Between 2002 and 2004 the LDNPA registered an average of 40 4x4s and 80 motorcycles a month on the High Tilberthwaite – Bridge End route. Following a Freedom of Information request the Authority has only recently admitted that it also holds figures for the first seven months of 2008. They show that the number of 4x4s had tripled to 90 a month on average, with the number of motorcycles remaining stable at 80 a month. It is incomprehensible why the LDNPA did not act after receiving this information 10 years ago.

For 2017 the only available figures are provided by the two farmers on the route, based on first-hand experience. They indicate a further massive increase in the number of 4x4s to between 300 and 400 a month. There are no numbers available for motorcycles. Both the 2008 figures and the 2017 figures

are clear evidence that the voluntary restraint management option adopted by the LDNPA has failed. The condition of both routes has deteriorated substantially (see Fig. 3) and a YouTube video posted by a 4x4 group, at https://youtu.be/N0y1sixW_M8?t=11m27s; in some places the surface has been eroded so badly that it has become very difficult for the High Tilberthwaite farmer to reach his stock. In June 2017 the farming family wrote an open letter, alerting the LDNPA to the condition of the track and the pressure of off-road vehicles coming through their farm. The family has now decided to relinquish the National Trust tenancy because of the degree of nuisance being caused by motor vehicles and will leave the farm later in 2018.



Fig. 3: 4x4 cars and erosion on the Tilberthwaite track.

Photo: Save the Lake District Campaign

This constitutes a significant weakening of a precarious agro-pastoral system of land management, given that in this area there are only two sheep farmers left. Any new tenants at High Tilberthwaite will be faced with the same problems, so it is difficult to see how this farm can be managed successfully if the LDNPA does not restrict access to the tracks.

As the custodian of the National Park, the LDNPA has the duty to act against developments that fundamentally change the character and the peace and tranquillity of an area. In 2006 all National Park Authorities received powers to impose Traffic Regulation Orders (TROs) so that areas of natural beauty could be protected. The LDNPA has stubbornly refused to consider using these powers over the last 12 years.

Protests and the LDNPA response

As early as 2000 local residents warned that the HOTR would publicise the routes to recreational drivers. In December 2000 the Chairman of the Langdales Society wrote in the Langdale Valley News that with the introduction of the Hierarchy of Trails Routes *'the LDNP have not just advertised the fact that 'green roads' are in fact legitimate highways; they have not just given permission for certain types of vehicles to use these tracks; they have positively issued a challenge which has been taken up by entrepreneurs.'*

In December 2004, the Langdale Valley News reported on a well-attended meeting in the Langdale Village Hall with the Trails Advisor for the LDNPA: *'Track conditions were of serious concern on many routes such as Elterwater to Little Langdale (via Birch Hill), Oxenfell to Hodge Close, Bridge End Cottage to Tilberthwaite. Here track surfaces had deteriorated, it was said, under the Hierarchy of Trails scheme to being worse than 40 years ago.'*

The same issue of the Langdale Valley News mentions a resolution passed by the Neighbourhood Forum meeting on 16th November 2004, calling for the scrapping of the Hierarchy of Trails scheme and for a traffic survey by the LDNPA and Cumbria Highways to recognise the problems and consult with residents as to how these should be addressed.

In 2005, residents wrote to the LDNPA to complain about the detrimental effect of the motor traffic on the landscape. The LDNPA replied that nothing could be done as this was a public road.

In 2006, after National Parks were empowered to prevent this kind of environmental damage by using Traffic Regulation Orders, the editor of the Langdale Valley News wrote: *'National Park management is clearly not protecting or enhancing the green lane environment in Langdale, which it is supposed to care about, along with the rest of the Park. Indeed, one of the special qualities of any national park is peace and tranquillity and TROs can be imposed on the grounds that off-roading is incompatible with such qualities.'*

In 2014, according to the minutes of the Local Access Forum, the National Trust representative reported that *'use of the route has increased and their tenant at High Tilberthwaite is impacted by the amount of vehicles coming through his farm yard.'*

In 2015 a member of the public presented the LDNPA with a detailed report on the damage to the two tracks and the detrimental effects on residents, particularly on farmers. She wrote that *'all the residents I spoke to were distressed and angry at the damage which is being done to the National Park, by the nuisance which they are experiencing personally and by*

the apparent inability or unwillingness of the National Park Authority or the Highway Authority to take action.'

In October 2017 a group of campaigners presented the Chief Executive of the LDNPA with a petition signed by 3,000 people, asking the LDNPA to conduct a consultation on a TRO for the two tracks, on the grounds set out in section 22BB Road Traffic Regulation Act 1984: *a) to preserve or improve the amenities of the area through which the road runs; b) to conserve or enhance the natural beauty of the area, or to afford better opportunities for the public to enjoy the amenities of the area, or recreation or the study of nature in the area.'*¹

In response the LDNPA said that it had started to monitor the tracks and that it needed until the end of November 2019 until a decision on whether to start the TRO process could be reached. This means a period of 30 months would elapse from the start of monitoring in June 2017 until a decision in November 2019, twice as long as other National Parks have needed. A TRO could then not come into force until 2021.

Conclusion and recommendations

Through its policy and current management practice in the area the LDNPA

- contributes to the destruction of the Lake District's unique agro-pastoral landscape
- negates and reverses the conservation efforts of the past century
- breaks the links of this landscape to its cultural, historical and literary heritage
- removes the opportunity for quiet enjoyment in a distinctive pastoral landscape of harmonious beauty
- fails in its statutory duty under the Environment Act 1995 to conserve and enhance the natural beauty of the area
- fails in its statutory duty to give greater weight to conservation if there is an irreconcilable conflict between conservation and any recreational interests.

We ask the UNESCO World Heritage Committee to remind the Lake District National Park Authority that its current policy on off-road driving on green lanes in the Lake District is not compatible with World Heritage Status. In particular, the LDNPA must take all necessary steps to ban off-road driving on the two tracks between High Oxenfell and Hodge Close and High Tilberthwaite and Bridge End as soon as possible.

¹ The petition, now with 6,300 signatures, can be found at https://www.change.org/p/to-the-ceo-of-the-lake-district-national-park-authority-save-a-beautiful-part-of-the-lake-district-from-destruction-by-off-road-motor-vehicles?recruiter=186557056&utm_source=share_petition&utm_medium=copylink&utm_campaign=share_petition

World Heritage at Risk: The Upper Middle Rhine Valley

Klaus Thomas and Elke Greiff-Gossen (Citizens Group Rheinpassagen)



Fig 1: The Middle Rhine Bridge is the center for the new east-west road traffic axis. It connects the motorways on the left and right banks of the Rhine, and internationally with the largest European port of Rotterdam.
Map: Bürgerinitiative Rheinpassagen

The UNESCO World Heritage Committee included the Upper Middle Rhine Valley between Bingen / Rüdesheim and Koblenz in the World Heritage List in 2002. The fusion of culture with nature, historic buildings and castle ruins, the banks of the Rhine surrounded by cliffs and vineyards, the breathtaking panoramas through the mountains constitute the Outstanding Universal Value of the World Heritage Upper Middle-Rhine Valley. It is lost now.

1. Middle Rhine Bridge

Plans for the construction of a bridge over the Middle Rhine have been resumed. The affected Rhein-Hunsrück district councils now refuse any planning and financial participation in the construction of this bridge. Reason: It connects motorways, federal highways and state-roads, it is the road link for a trans-regional, international road network.

The planned Middle Rhine Bridge is intended to be at the heart of a new, inter-regional traffic axis between east and west. All

new reports confirm this purpose^{1,2,3}. "As a basis for coordination with UNESCO, a design was awarded the first prize which provides for a bridge in the form of a curved steel structure [4]⁴. As a central link, it links the classified road networks in east-west direction and the federal highways 9 and 42 running north-south to the left and right of the Rhine and conveys local, regional and national traffic to the neighboring road network". (National court of auditors, „Landesrechnungshof“)

1 National Court of Auditors (Landesrechnungshof), 27 Feb 2017

2 Prof. Dr. jur. Willy Spannowsky 29 Jan 2017, University of Kaiserslautern

3 Regional Development Plan (LEP IV) Rhineland-Palatinate

4 Competition winner Heneghan, Peng-architects

All planning and expert reports submitted to the World Heritage Committee^{5,6,7} only assess a regional transport connection via the bridge and no trans-regional traffic. In addition, reports confirm that the figures used in previous reports are not comprehensible and therefore cannot be used. (Landesrechnungshof: Limited meaningful and outdated data from the 2009 traffic investigation), Landtag Scientific Research Service: This 2009 traffic inquiry is not suitable to clarify the classification of the bridge).

The construction of a bridge over the Rhine has therefore been applied for with incomprehensible and therefore unused numbers as the construction of a regional bridge, although it was clearly established from the beginning that the bridge serves the connection of highways and is integrated into the trunk road network.

In its 2009 report, RWTH Aachen describes the “Improvement of local connection quality in east-west direction for cyclists and pedestrians in the center of the World Heritage area”. There will be no such thing as all ferries cease their operation with the construction of a bridge (the state government is informed). For people without a car, the Rhine becomes a border. On the roads, there will also be considerable additional traffic seeking to cross the Rhine. In addition, long-distance transport by road will be relocated to the Middle Rhine Valley already affected by rail traffic. The B49, the link between the A3 and A7 motorways, is used daily by up to 50,000 vehicles and a high percentage of freight traffic. This traffic cannot be ruled out on the Mittelrheinbrücke (Middle Rhine Bridge).



Fig. 2: The state of Rhineland-Palatinate now wants to build a road bridge for trans-regional traffic over the Rhine. All ferries would then stop their operation. Traffic and noise would continue to rise. Photo: Bürgerinitiative Rheinpassagen

Before the construction of a bridge, it should be required that the intended regional planning procedure, other planning procedures and the environmental impact assessments take into

account all the roads connected to the bridge, including connections to the A3 and A61 motorways.

2. Railway noise

The railway lines on the Middle Rhine are part of the European railway network TEN (Trans European Network). They are part of the Rhine-Alpine corridor and connect Europe's largest port of Rotterdam on the North Sea with the port of Genoa on the Mediterranean. A large part of the route runs along the Rhine and traverses the Alps through the Gotthard Base Tunnel in Switzerland, which was completed in 2016. More than 50,000 trains per year (freight traffic) are running on the relevant sections of the Middle Rhine Valley. The Federal Railway Office predicts an increase in freight traffic on these routes by 30 percent by 2030 (Source: Federal Railway Authority).

The Federal Government has declared its intention to significantly improve noise reduction by banning freight trains not fitted with a low-noise tracking system as of 2020 (39th session Bonn, 2015). These intended measures alone do not cause any noise reduction simply because of the strong increase in rail freight transport.

In addition, an application has been prepared to develop an alternative route outside of the valley to be included in the Federal Transportation Infrastructure Plan and the Federal Railway Development Act (39th session Bonn, 2015)

The high volume of traffic on the railway lines of the Middle Rhine, with a regular noise level of 100 dB (A) and more, is known to all those responsible. The World Heritage Committee greatly complained of noise pollution in Decision 34 COM 7B.87 “Noise and traffic increase” and Decisions and Drafts 32 COM (7B.93, N° 5) and 33 COM (2007) 714, No. 7. Despite recognition of the further increase in freight traffic, the Federal Republic of Germany has left no hope of reducing rail noise on the Rhine: The Federal Transport Ministry of Germany sees no urgent need for a new traffic-line in the Middle Rhine Valley because of railway noise. Instead of the Middle Rhine Valley, a new railway line is being built between Dresden and Prague, although traffic on the Elbe is significantly lower with only one third of freight trains.

The railway tunnels between St. Goar and Oberwesel built in 1858 and 1859 need to be rehabilitated. For the favored new construction of a tunnel, about eight kilometers long, from St. Goar to Oberwesel (variant “Pink”), no funds are provided for in the Federal Transport Infrastructure Plan. The three historic tunnels directly opposite the Loreley will now be repaired from 2019. For technical reasons, the repairs will also be visible on the outer sides of the rocks.

Reduced speeds and night driving bans cause significantly lower noise and reduce vibrations. Individual measures can also

5 RWTH (University) Aachen: Visual Impact Study 2009, expertise 2009, final report 2010

6 Visual impact study COCHET CONSULT, 8 May 2009

7 Environmental impact assessment with a visual impact assessment

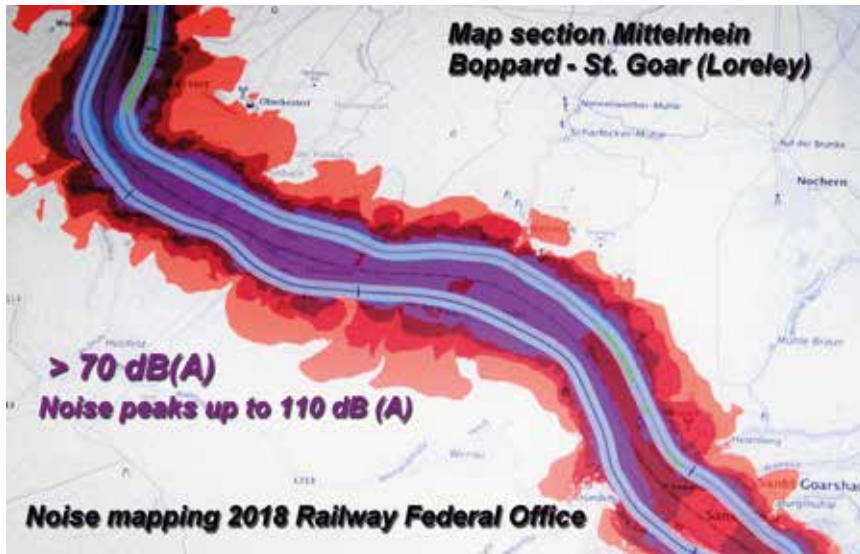


Fig. 3: Rail traffic causes a lot of noise in the Middle Rhine region. And it is increasing because of the strongly increasing traffic on the Middle Rhine railway lines. A new railway line will not be built. There is also no prospect of a new tunnel between Oberwesel and St. Goar.

Map: Bürgerinitiative Rheinpassagen

bring about significant noise reductions: The technical facilities on the railway lines allow identification of particularly loud freight cars on the trains. If such cars are immediately removed from the trains, train noise can be significantly reduced. None of the permissible measures will be implemented, presumably because the expected high freight throughput on the Middle Rhine routes will not be achieved. The legal admissibility of such orders has been confirmed by experts.

It is necessary to determine

- the Middle Rhine bridge serves the national road traffic. The expected high traffic in the Middle Rhine Valley, together with the increasing railway noise, destroys the outstanding universal value of the World Heritage Upper Middle Rhine Valley. The planning for the construction of a bridge over the Middle Rhine in the World Heritage area must be abandoned;
- instead of planning a bridge, ferry connections should begin to be improved;
- the noise, in particular of railways and roads, must be significantly reduced.

3. The Loreley Plateau

The Loreley Rock is one of only a few places in the world where a myth can still be pinpointed. It is the epitome of Rhine romance. Derived from this, the rock is today the central identification point of the World Heritage Upper Middle Rhine Valley. As one of the most distinctive places within the cultural landscape, the Loreley has a charisma far beyond the national borders.

Now, the Loreley rock is being extensively rebuilt. In the center of the Loreley rock, a landscape park with a central building called "Mythenraum" (myth room) and an illuminated obelisk

will be erected on it. In addition, a new hotel will be built on an area of 28,000 square meters. Unmistakably and now visible from the Rhine Valley, the Loreley stage was extended. The trees now planted will never be able to cover this huge white tent roof, neither in summer nor in winter. The listed stone staircase to the stage is currently being overbuilt by a steel structure.

A concept for preserving the myth of the Loreley, so important to the world heritage, has not yet been developed. In the application for the inscription of the Upper Middle Rhine Valley into the world heritage list, the "postcard view" from the right side of the Rhine over the castle Katz to the Loreley rock is described. It does not exist anymore. The State of Rhineland-Palatinate has now presented to the public its plan to build a suspension bridge over the Rhine to the Loreley.

The figures below show aspects of buildings and construction that are already visible in the construction phase. They refute the visual viewing-axis studies that guarantee a visual integrity of the rock. The magic and the mysticism are built over; the way to the old myth, the legendary tradition of the blonde maiden on the rock of the Loreley, will lead in future over a suspension bridge to a myth room with obelisk.



Fig. 4 and 5: The roof of the Loreley stage in the heart of the World Heritage Upper Middle Rhine Valley.

Photo: Bürgerinitiative Rheinpassagen

We recommend to

- design the Loreley stage such that it is not visible from the surrounding vantage points in the Middle Rhine Valley (restoration of the free view to the Loreley rock);
- prohibit more buildings on the Loreley rock that would be visible from afar and within the viewing-axis;
- declare a suspension bridge to the Loreley rock incompatible with the outstanding universal value of the World Heritage Upper Middle Rhine Valley.



Fig. 6: The former Loreley stage. Surrounded by trees and no higher than the tree tops themselves. Not visible from the valley or various viewpoints.

Photo: Bürgerinitiative Rheinpassagen



Fig. 7: The "myth room" on the Loreley rock under construction.

Photo: Bürgerinitiative Rheinpassagen

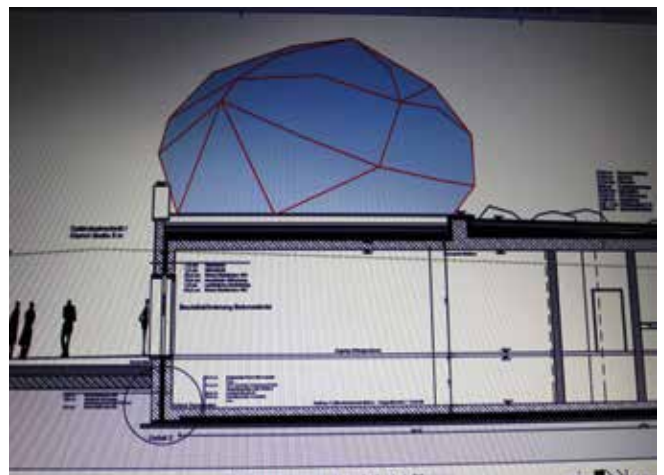


Fig. 8: The planned obelisk.

Photo: Bürgerinitiative Rheinpassagen

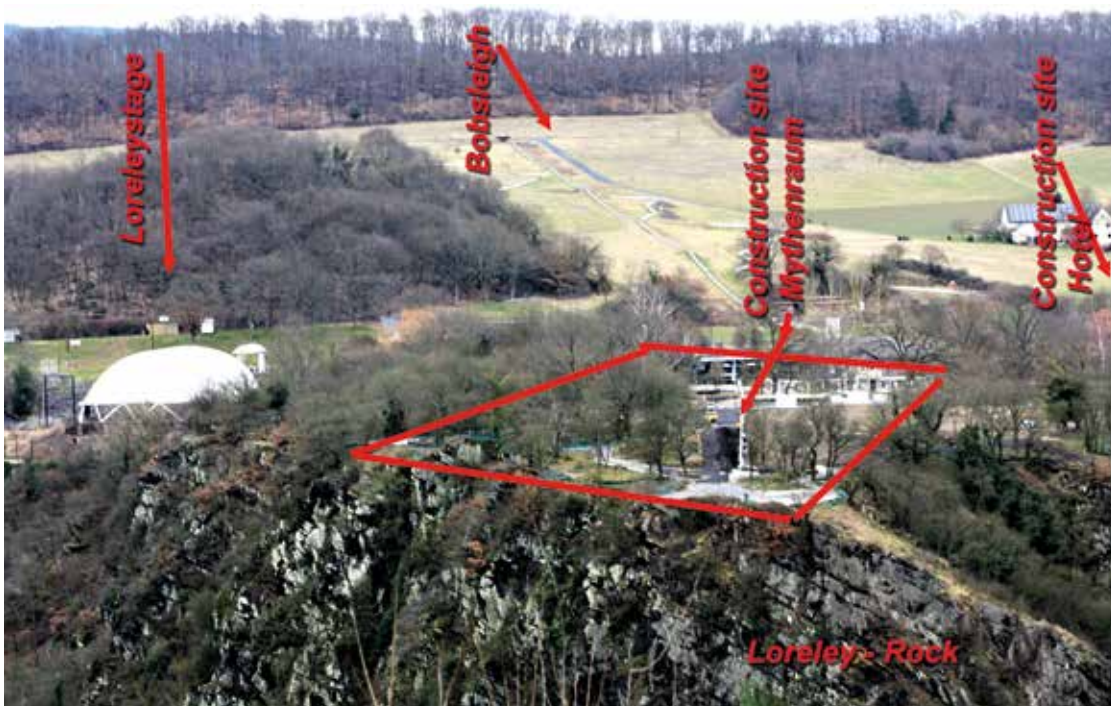


Fig. 9: The myth of the Loreley is obstructed: stage, "myth room" with obelisk, and a huge hotel are under construction. Seen from the Loreley viewpoint "Maria Ruh" on the left bank of the Rhine. In addition, a suspension bridge is planned to connect the hilltops on both sides of the Rhine.

Photo: Bürgerinitiative Rheinpassagen

International Appeal: The Case of Italian Prosecco DOCG Region

The Pesticide Action Network (PAN)



Pesticide Action Network (PAN International), a network of over 600 participating nongovernmental organizations, institutions and individuals in over 90 countries working to replace the use of hazardous pesticides with ecologically sound and socially just alternatives, appeals to the UNESCO world heritage to make sure that when singling out cultural and natural heritage around the world, the wellbeing and health of its habitants, of future generations and of the environment is not neglected or endangered by the use of highly hazardous pesticides.

The recent nomination of the region of Prosecco DOCG in Treviso (Italy) to become a UNESCO World Heritage in 2017 has revealed an urgency for action to be taken by UNESCO regarding the use of hazardous pesticides in the nominated sites.

The region of Prosecco DOCG is characterized by intensive wine production, where vineyards cover both urban and natural areas over the entire area, and where hazardous pesticides are intensely used. Citizens of Prosecco region have been active in community-based struggle against the use of hazardous pesticides in order to protect themselves from exposure. The intensive use of pesticides has already proven adverse effects on the health of the local population and the quality of life in the region. People living in proximity to wine growing areas are suffering from those effects day-by-day. (Annex: Testimonies of Pesticide Victims)

In fact, the danger of synthetic pesticides is explicitly recognized by local law, where access to tourist routes is prohibited during spraying periods, or when it imposes large spraying distances – that are often inapplicable – from dwellings, roads and sensitive sites (e.g. 50 meters). An example is given by the Regional law of Veneto No.1379 / 2012 inviting the Citizens to “close the doors and windows, cover the gardens and not stand close to the land plot that is going to be treated”.

The application of the Prosecco Hills as UNESCO World Heritage site started in 2008, in 2010 was recognised by Italy as a national heritage. Since then, citizens of Prosecco areas have intensified the struggle against the use of hazardous pesticides, strongly opposing the inscription of the region in the World Heritage List. Local citizen groups have been taking up a series of important initiatives to ask for a ban on synthetic

pesticides in the region. Among these initiatives, on 28 May 2017, a march was organized with more than 3,000 citizens and representatives of more than 120 local, regional and national associations. In May 2018, almost 5,000 people participated in the march calling for a pesticide ban.¹ ICOMOS Technical Evaluation mission visited the nominated property from 2 to 8 October 2017, upon which an evaluation report was based, and concluded that the Region of Prosecco DOCG **should not be inscribed** on the World Heritage List² highlighting factors of industrial wine production severely affecting the cultural landscape.³

Therefore, PAN International appeals on UNESCO to

- NOT confer World Heritage status on any region where highly hazardous pesticides (HHPs) are used (and no binding obligation is made for a step-by-step exit of their use.)
- INCLUDE in their catalogue of criteria for the identification of World Heritage sites that the world heritage status conflicts with the use of highly hazardous pesticides (HHPs), that World Heritage regions must be free from their use or at least provide a scheme for a progressive ban of HHPs⁴ whose implementation is monitored by the UNESCO.
- USE the PAN International list of highly hazardous pesticides⁵ to identify HHPs. The List is based on the criteria set by The Food and Agriculture Organization (FAO) and World Health Organisation (WHO) of the United Nations.

At its recent symposium on agroecology (April 2018) FAO promised to promote agroecology throughout the UN system. By denying such sites of the status of “UNESCO world heritage”, where HHPs are in use and contribute to people’s illness and environmental pollution, UNESCO would contribute not only to

1 Local News in Italian, “Follina, 4.700 in marcia contro i pesticidi” <http://tribunatreviso.gelocal.it/treviso/cronaca/2018/05/14/news/follina-4-700-in-marcia-contro-i-pesticidi-1.16834458>

2 ICOMOS Evaluations of Nominations of Cultural and Mixed Properties, 2018, WHC -18 /42.COM/INF.8B

3 Ibid., p.235

4 THE UN’s Food and Agriculture Organization (FAO) recommended a global progressive ban of HHPs in 2006.

5 http://pan-international.org/wp-content/uploads/PAN_HHP_List.pdf

the FAO's promise but also contribute to achieving the Sustainable Development Goals (SDG).

The use of highly hazardous pesticides is not necessary to safeguard wine production⁶ and to secure the cultural heritage of the Prosecco region. Italy has a good track record with regions/towns going without pesticides and a bad track record of adverse health effects from pesticides that reaches from acute poisonings to cancer. A very recent report by Italy's environment agency ISPRA has revealed that Italy's surface and ground water resources suffer from severe pesticide contamination⁷.

In the run-up to the upcoming decision on the Prosecco region, PAN calls on UNESCO **not to certify the monoculture of the 15 municipalities of the Prosecco DOCG in Treviso (Italy) as a human heritage until they stop the use of HHPs**. PAN offers to UNESCO and the Prosecco body to work with the later to stop the use of HHPs and move towards agroecological practices instead.

Highly Hazardous Pesticides (HHP)

The PAN HHP list⁸ includes pesticides with high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems. With the HHP list, PAN provides authorities, cultivation organisations, advisers, farmers and other interested parties with a tool to identify highly dangerous pesticides and then to replace them with safer and more sustainable alternatives.

Testimonies of Pesticide Victims

"My name is Gianluigi Salvador and I live in Refrontolo, in the Province of Treviso, Italy. When I moved there, the ecosystem in Refrontolo was still mostly uncultivated and there were only a few farmers in the area. Gradually, the prosecco's trade, the most famous local wine, exploded and the demand increased. The entire area was transformed into a monoculture of vineyards for the production of prosecco. My home and my orchard were constantly contaminated because of the drift of neighbours' pesticides. My family is forced to remain home when we hear the spray nozzle and we cannot enjoy our garden for five months of the year. I wanted to start cultivating vegetables in my small hectare but it is no longer possible. Conventional Prosecco vineyards--and the pesticides that they apply--are everywhere and the paradise that wel-

comed me and my family to the area became just a memory."
Gianluigi Salvador

"My name is Viviana and I live in Cappella Maggiore, in the Province of Treviso. In September 2015 I've sent a letter to the mayor of the town complaining about the massive quantity of pesticides used in vineyards situated next to the local private houses. Since several years, mainly between May and August, I've started suffering of nausea, I have had a strong feeling of dizziness and I have been forced to rest in bed for many hours. Syncope has also occurred and I had to go to the hospital. Analyses have not found any pathological causes but, during the annual ultrasound scanner, doctors have found two thyroid lumps which I didn't have the previous year. Those thyroid problems have later increased: one of the two lumps became bigger and two new ones have been diagnosed. The doctor told me that this kind of disease is spreading around the area of Conegliano-Valdobbiadene, the core of prosecco's production. He advised me to contact ARPAV, the Regional Agency for the Prevention and the Protection of the Veneto Region's environment, and to aware them about the pervasive problem. When I've started complaining about the local harmful situation, several doctors and other employees of the local Preventive Department, responsible for the general public's health, did an inspection of my house and the surrounding area. According to their considerations, the reason of all my health issues was an arthritis of the dorsal disc that has been caused by an accident I had 40 years ago, whose symptoms apparently has never arisen before. Nobody referred to my complaints about the incidence of pesticides or the frequency of sick people in the area where I live. I'm not a doctor but I think it's quite unrealistic that this arthritis of the dorsal disc causes pain only in summer and for a short amount of time and I still think it's bizarre that also my neighbours are affected by similar symptoms. Few days before the doctors and the other employees of the Preventive Department came, the vineyards bordering with my property have been eradicated and that year, during the usual months of pain, I had no more problems: is it a chance or is the arthritis of the dorsal disc that has mysteriously disappeared?" Viviana X

6 See the interviews of organic wine producers For learning more about organic prosecco production please watch our interviews with producers: <https://youtu.be/zRZ2fRZUWKM>; <https://youtu.be/pJnNOQSUppA>; https://youtu.be/OtlzMHCcN_M.

7 http://www.isprambiente.gov.it/files2018/pubblicazioni/rapporti/Rapporto_282_2018.pdf

8 PAN HHP list, visit http://www.pan-germany.org/download/PAN_HHP_List.pdf

Curonian Spit National Park: Will We Save or Lose It?

Alexandra Koroleva, Ecodefense



The Curonian Spit was included into the UNESCO World Heritage List in 2000 as “an outstanding example of a landscape of sand dunes that is under constant threat from natural forces (wind and tide). After disastrous human interventions that menaced its survival, the Spit was reclaimed by massive protection and stabilization works that began in the 19th century and are still continuing to the present day”.

18 years later, the same problems that threatened the existence of the Curonian Spit several centuries ago are acute again.

Destruction of sea coast and foredune: history lessons unlearned

The Updated Report on the State of Conservation of the UNESCO World Heritage Property Curonian Spit (Russian Federation) (№ 994) in 2016 has two paragraphs dedicated to this problem, and this by no means reflects the true seriousness of the problem.

An artificial continuous sand ridge of coast dunes, called the foredune, was created in the XIX century to prevent sand-induced catastrophes. However in recent years natural and anthropogenic factors have led to its destruction. In considerable areas only the back part of the foredune has remained, and sea waves wash sand and vegetation down from it during storms. Now, sea coast destruction processes prevail over any accumulation, especially with regard to the south part of the Curonian Spit and all the more so in the area where it is attached to the mainland. Sea coast destruction is also caused by increased storm frequency, as now, instead of one extreme storm in 2-3 years, 1-2 such storms are registered per year. In 2017, Curonian Spit beaches lost a layer of sand no less than a meter and a half deep, and the foredune was destroyed all along the Spit and completely deleted in some areas as result of storm.

The foredune mitigates the negative effect of storm waves only by being destroyed. Man-made, it needs annual repair which is to be carried out after winter storms and the summer tourist season. However, in the 2000s regular foredune repair and restoration activities had significantly decreased. Traditional repair and restoration techniques had been lost, so that hollows and



Fig. 1: An artificial continuous sand ridge of coast dunes, called the foredune, was created in the XIX century to prevent sand-induced catastrophes.

Photo: Aleksandra Koroleva

‘wind gates’ have been filled up with brushwood which provides source for forest fires and does not preserve the foredune since brushwood is washed away by storms.

In 2012, a storm that hit the Curonian Spit and caused severe destruction along its coast forced the National Park management to look for ways of preventing total destruction of the foredune. In 2015, the foredune was introduced into the National Park balance sheet as a man-made object, and the Park management was put in charge of maintaining the object.



Fig. 2: In 2017, Curonian Spit beaches lost a layer of sand from one to two meters deep.

Photo: Aleksandra Koroleva

In 2016-17, in the context of the Federal Investment Program, a project of full foredune restoration was developed and approved by the State Environmental Review and the State Technical Expertise. In 2019, federal funds will be allocated to start with foredune restoration on its most affected areas extending over 2 km. 17,300 cubic meters of sand are estimated to be used for that. Almost 3,000 m² of the foredune sea-front slope will be secured with traditional wooden structures to accumulate sand and to be planted over with sand-loving (ammophilous) plants able to keep back the movement of sand.

It should be emphasized that 3.1 ha, or 2 out of 50 km representing the whole length of the Russian part of the Curonian Spit sea coast, do not receive even a partial solution of the problem. It is obvious that, due to time lost, the foredune destruction rate is much higher than its reconstruction rate, and therefore the Park management will have to take urgent and immediate measures.



Fig. 3: The traditional way to strengthen the vanguard is to create cages for the accumulation of sand.

Photo: Aleksandra Koroleva

At the same time, the foredune reconstruction does not render hydrotechnical coast reinforcement activities unnecessary. From November 2016 to February 2017, the state coast protection institution Baltberegozashita implemented a hydrotechnical coast protection construction project which was not approved by the National Park management, nor did it go through an environmental impact assessment procedure. Winter storms destroyed those structures. According to the Park management, the project “is one link in the long-lasting chain of unprofessional struggle against natural forces at the Kaliningrad sea shore”, and therefore “implementation of the foredune restoration project might become an ineffective waste of budget funds”.

Illegal Construction: destructive human intervention in modern times

The Update Report on the State of Conservation of the UNESCO World Heritage Property Curonian Spit (Russian Federation) (№ 994) in 2016 states that “in 2016 there were no cases

of illegal construction within the boundaries of the Russian domain on the World Heritage Site”. However, first systematic efforts to solve the problem of uncontrolled construction of living and guest houses based on illegal allocation of land plots started to be taken only in 2015-17, and were not initiated by the National Park administration.

Since the Curonian Spit National Park was established, its administration and municipalities of the settlements situated in the Park’s territory have been allocating sites for construction within the Park; borders of the settlements have been changed arbitrarily; and lands of forest category have been converted to dwelling category. This lawlessness is possible, in particular, due to imperfection of Russian legislation on land management and special use land protection, declarative nature of the Park’s borders, and insufficient control by the Ministry of Natural Resources of the Russian Federation. So, in 2007, a 6 ha land plot was illegally allocated for construction of cottages inside the Park (Rybachy settlement, see fig. 4). The site was laid out for 31 cottages, each of them was marked with concrete slabs imitating foundations (see fig. 5), but construction has not started. In April 2018, the land allocation was acknowledged to be invalid, and the land is planned to be handed back to the jurisdiction of the Russian Federation. This and other efforts to stop illegal construction in the National Park were undertaken by the Kaliningrad Interregional Nature Protection Prosecutor’s Office.

In 2015, monitoring of legal documents was carried out that allowed making amendments to the relevant legislation ensuring proper protection of the UNESCO World Heritage site. Moreover, the Prosecutor’s Office managed to secure the major regulations to provide protection of the Curonian Spit in courts of all instances.

In 2015-17, the whole territory of the Curonian Spit was included in the State Land Registry as land with special conditions of use and protection, and the Park boundaries were properly registered making it impossible, under existing legislation, to change the boundaries afterwards.

Special conditions of use and protection as they are declared by the territorial status and ensured in the Registry have significantly restricted the rights of municipalities, and stipulated that permissions for construction can be provided by the Ministry of Natural Resources of the Russian Federation only. These conditions make it also impossible to carry out construction activities in the Park without recourse to the state environmental expertise. On these grounds, the Prosecutor’s Office deemed illegal any action taken by municipal authorities on running construction activities and issuing permission for such activities to private individuals.

Furthermore, in 2017, as a result of the Prosecutor’s inspections supported by the Supreme Court of the Russian Federation, the General Plan of municipalities located within the bound-

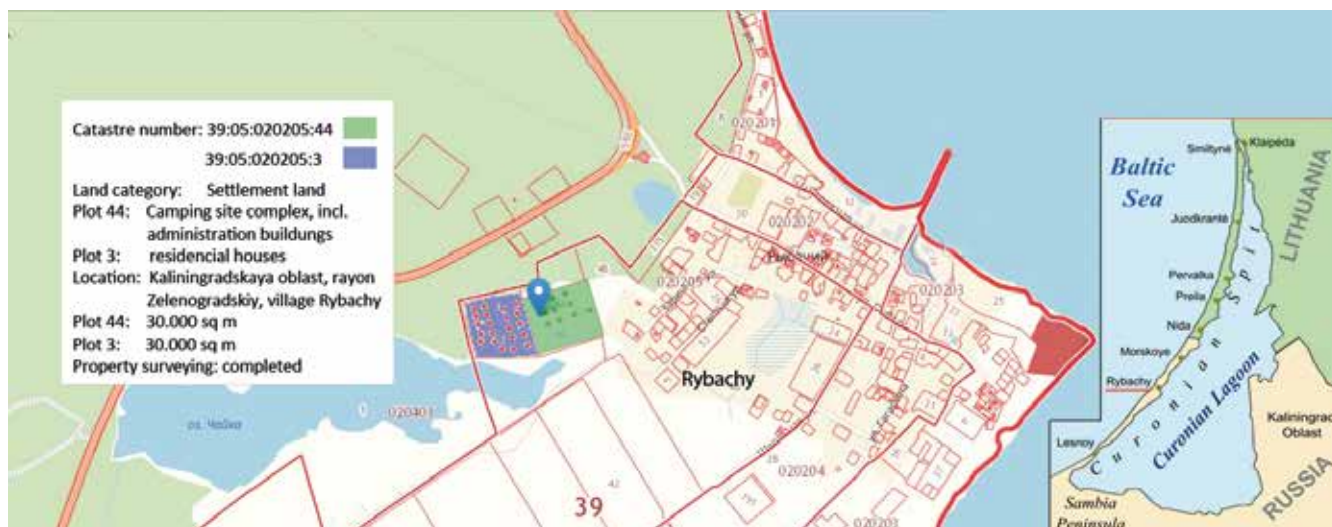


Fig. 4: in 2007 two 3 ha land plots (cadastral numbers 39-05020206:3 and 39-05020206:44) were illegally allocated for construction of 31 cottages at the territory of the Park (Rybachy settlement).
Map: Aleksandra Koroleva / M. Lenk

aries of the Curonian Spit National Park was cancelled as not corresponding to the legal requirements. This has once again ensured the exclusive proprietary right of the Russian Federation to lands within the National Park, and applied additional encumbrance to execute nature protection legislation for the existing real estates.



Fig. 5: 31 illegal future cottages are marked with concrete slabs imitating foundations (Rybachy settlement)
Photo: Aleksandra Koroleva

These objects include numerous holiday camps and guest houses that are the National Park's landholders. Unauthorized construction, trampling down of soil, littering up of forest, pollution of the Curonian Lagoon with sewage waters have been frequently registered at their territories. Now over 40 of such landholders automatically became forest users, their rental payment increased significantly, and essential encumbrance appeared in the form of obligation to develop a forest management project and report on its annual implementation, to apply to nature protection authorities for approval of any economic

activities, to identify the borders of their land spots and register them in the state inventory. More than thirty of the landholders have already developed their projects of forest management.

In 2017, resulting from a refusal to execute the new conditions for landholders, the court obliged an owner of a holiday camp to dismantle an illegally constructed building and bring the land back to its initial state at his own expense.

This work is ongoing as the situation remains far from ideal. However, it is the first time over the whole period of the National Park's existence that there is a positive dynamic toward solving the problem of illegal construction.

As we see, in 2015-17, the foundations to solve the major problems threatening sustainability and the very existence of the Curonian Spit have been established. The most important question is whether this positive tendency remains in effect, and if the efforts taken are sufficient to overcome the critical situation.

It also needs to be stressed that the 2016 Update Report on the State of Conservation of the UNESCO World Heritage Property Curonian Spit (Russian Federation) (No. 994) as well as the Report of the ICOMOS Reactive Monitoring Mission to Curonian Spit (C 994), from 19–22 January 2015, has left outside its attention a number of other problems such as

- insufficient capacity of wastewater treatment facilities in the settlements leading to eutrophication of the Curonian Lagoon;
- extremely high recreational pressure onto the ecosystems of the Curonian Spit (in summer time 1800 visitor cars per day are registered while having 600 parking lots available);



Fig. 6: A whole street of illegally constructed houses awaits demolition (Lesnoj settlement).

Photo: Aleksandra Koroleva

- investment projects are implemented on the Curonian Spit without taking into consideration its status (for example, a hydrotechnical coast protective construction project carried out in a vulnerable area where the Curonian Spit is attached to the mainland did not undergo an environmental impact assessment procedure).

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Podesennya – the Emerald Heritage of Ukraine

Irina Nikiforova, Initiative for St. Andrew's Passage

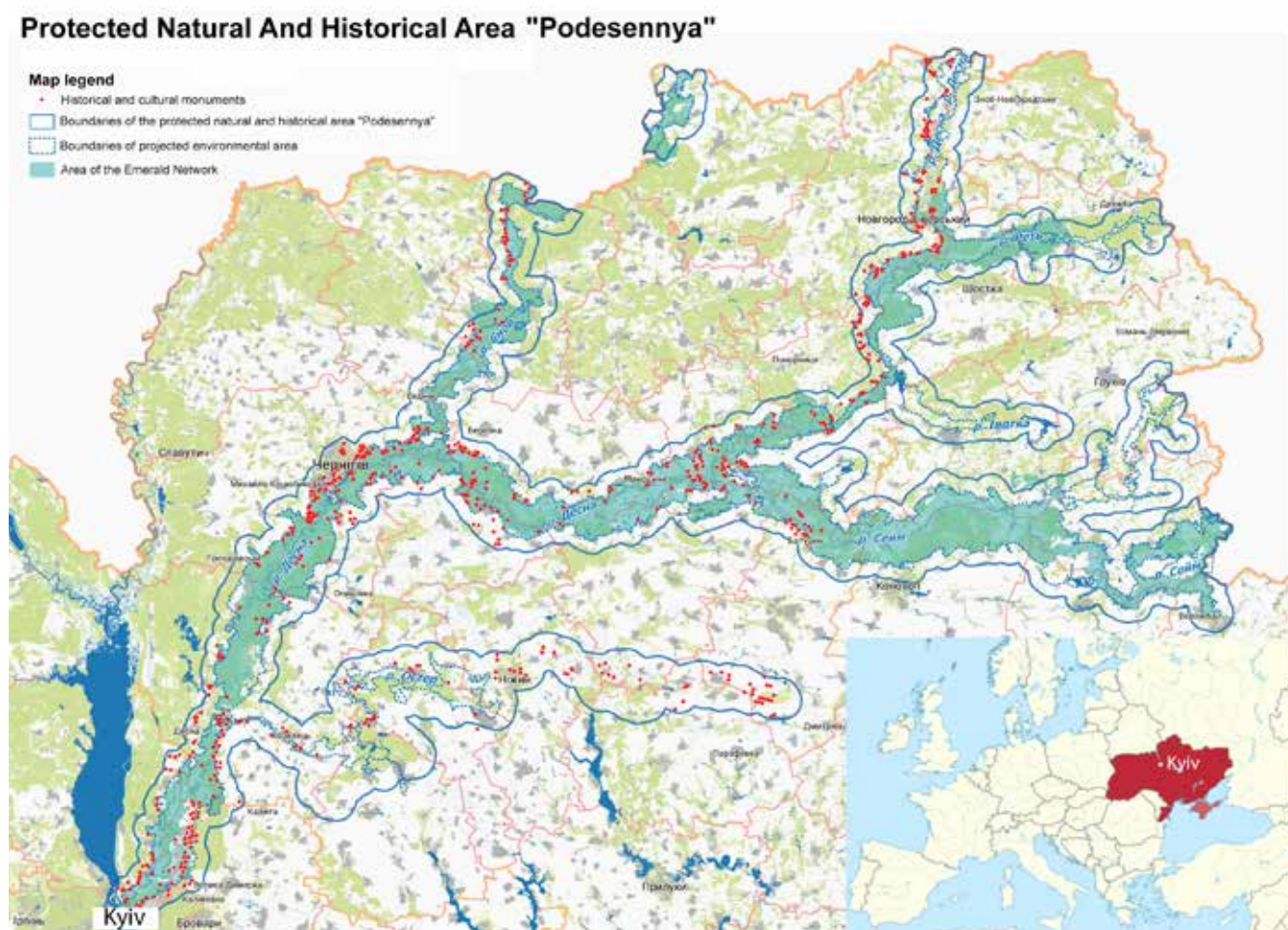


Fig. 1: Map: Initiative for St. Andrew's Passage

M. Lenk

The Emerald Network of Europe was set up by the Council of Europe in 1989 under the Bern Convention. This was made to ensure that all high biodiversity areas of European importance are identified, their ecological inventories are completed and their importance is legally recognized. In 2017, the Ukrainian site of Podesennya was officially included in the Network.

Description

Podesennya is a huge territory of more than 800,000 hectares in the North of Ukraine that covers the floodplain and the valleys of the Desna River and its confluents – the Snov and the Sych. The Desna is the largest unregulated river in Europe, the water of which possesses healing properties owing to its in-

creased content of iodine, and the river provides the purest water in Ukraine. Due to the lack of urban development and any construction activities, as well as the free flow of floodplain, numerous natural landscapes of the Eastern European type were formed there, which are almost in their original state and perfect condition.

The floods of these rivers serve as natural ecological corridors for the migration of millions of birds. The territory is under protection of four International Conventions, ratified and adopted by Ukraine: the European Landscape Convention (Florence, 2000); the Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 1979); the Convention on the Protection and Use of Transboundary Watercourses and Inter-

national Lakes (Helsinki, 1992); and the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar, 1971).

246 rare species of birds have been identified on the territory; 43 species are listed on the Red Data Book of Ukraine, 13 in the IUCN Red List and 15 in the Red List of the European Union.

Historical background

The archaeological and historical objects of *Podessennya* are of equal value and significance as its natural component. According to the Institute of Archeology of the National Academy of Sciences of Ukraine, more than 10,000 archaeological sites are currently in need of research in the floodplain terraces of the rivers. They were formed during the last glacial period of the XV–X centuries BC, and since then have been the territories of the formation, development and migration of historical communities of people: Trypillians, Cimmerians, Scythians, Sarmatians, Goths, Huns and Slavs. It is here that the Slavic civilization originated. The territory of *Podessennya* is known as the intersection of major trade routes which for thousands of years have connected East and West, North and South. It was the most famous trade route in the beginning of the first millennium, from the Varangians to the Greeks, which passed over this land.

The numerous monuments of the Neolithic period, of Trypillia culture, monuments of the Scythian and Sarmatian periods, the Kievan Rus' and of the Cossacks' times were discovered within the area but have not yet been explored.

The remaining sites of ancient man of the Paleolithic era (Puskarska and Mizensk man sites), the settlement of the early Trypillia era near Oster, the burial mounds of the Scythian period (the village of Shestovitsa, Morozovsk), fortification settlements, hillforts, burial grounds, necropoleis (Chernigiv, Sednev, Shestovitsa) are of outstanding value.

Near the village of Vypovziv, Early Russian settlements of the IX century - the days of Prince Oleg – have been investigated for ten years, and objects of the Cossacks' times are being investigated on the river Seym.

Ancient cities of centuries-old history – Chernigiv (907), Snoves'k (1068), Novgorod-Siversky (1079), Gorodets Ostersky (1098), Kozelets (1098), Moraviez (1139), Blesovit (1151), Horobor (1153), Lutava (1155), Sosnitsa (1234) – majestically rise on the rivers' slopes, representing unsurpassed historical and cultural landscapes.

The wooden and stone churches, monasteries, cathedrals and monks' caves of the area remain in their almost original form. For example, near the city of Kozelets there is a church of the pre-Mongol period – *Yuriev's Goddess*, in which XIIIth century frescoes have been preserved.

All these objects require immediate inventorying, conservation and/or restoration and simultaneous archaeological and scientific research; providing them with official protective status and giving them legal protection.

Threats

- a) Due to its vast territory and a long distance from the major industrial centers, the area is preserved in a comparatively good condition. Nevertheless, uncontrolled (and often illegal) economic activity, that is now happening in *Podessennya*, mostly without understanding the importance of preserving the river-valley landscapes, the integrity of the archaeological artifacts, threatens its state of conservation. New business projects aiming at the development of the wetlands do not take into account the negative impact on the natural environment and increase the risks of its pollution. In particular, there are projects of construction of big livestock complexes, plowing floodplains, application of unacceptable amounts of fertilizers and use of poison chemicals.



Fig. 2: Panoramic view of Novgorod-Siversky.

Photo: Initiative for St. Andrew's Passage

A further great concern, however, is caused by the plans the resumption of navigation in the area, clearing the watercourse of the rivers, hydro-aggradational works, extraction of minerals from the bottom of the rivers, and others. One of the most serious threats to *Podesennya* is an intention to build a cement plant in Novgorod-Seversky. The projected factory, in case of its construction, will become the largest cement plant in Ukraine, and one of the largest in Europe. It is intended that the plant will export its products to the European Union. For this purpose the project management plans to organize the transportation of cement by barges along the Desna River to the Dnieper and further to the Black and Mediterranean Seas. Everyone who imagines a twisting Desna channel with river bars and shoals, realizes that large-scale transportation with the use of barges here can not be set going. Therefore, in the future, it is planned to straighten the Desna waterway and to provide other works aiming at facilitating the movement of barges. This will completely destroy the nature of *Podesennya*, change its hydrological regime and spoil its floodplain. It would never be possible to restore the unique landscape again.

- b) The archaeological sites of *Podesennya* require appropriate conservation and maintenance. Not all of them are properly inventoried and officially recognized, that is why they are especially vulnerable to the activity of so-called black archaeologists (grave robbers), who carry out unauthorized excavations. As a result, a significant number of found artifacts end up in private collections and are not accessible to science and the general public. Besides, due to changeable weather conditions and relief features, soil slips often occur there. It is necessary to implement priority measures to strengthen the slopes, to carry out landslide protection works and to provide regular monitoring.
- c) The architectural monuments of *Podesennya* also suffer from lack of appropriate maintenance. Though the state of conservation of the majority of the churches is at an acceptable level, some immediate action should be taken to preserve the ancient frescoes. For example, the outstanding value of the XIIIth century frescoes of the *Yuriev's Goddess Church* (see Fig. 3) – a church of the pre-Mongol period near Kozelets – is comparable with the frescoes of Saint Sophia Cathedral and the Church of the Saviour-at-Berestovo, that are inscribed on the UNESCO World Heritage List. Unfortunately, due to the lack of financing, plans of conservation and restoration with implementation of the modern high-quality technologies, do not seem realistic in the near future.

Conclusion

The territory of *Podesennya* requires not only recognition and identification, but also careful protection. The river valleys are genetically and dynamically integrated in a landscape of unique aesthetic beauty and need to be preserved as one interconnected and integrated complex. Besides, unexplored monuments of human history that are in need to be studied are concentrated in the area. Granting this territory official protec-

tive status of a National Reserve will help to preserve the historical and natural monuments of mankind. Negotiations on the issue have already started with the Ministry of Culture and the Ministry of Ecology of Ukraine.

Moreover, the protection of the natural, historical and cultural landscape of *Podesennya* should be organized both at the national and international level. The site is unique and especially valuable not only for Ukraine itself but also for the whole of Europe. It meets at least four UNESCO's criteria (III, IV, IX, X) and is worth being added to the number of the Ukrainian objects in the World Heritage List.



Fig. 3: Yuriev's Goddess, Oster.

Photo: Initiative for St. Andrew's Passage

The introduction of the Site to the Ukraine's Tentative List will provide the following advantages:

- better protection and conservation of the territory;
- greater funding, attracting additional resources for the archaeological excavations and scientific researches;
- popularization and world-wide recognition of the Property;
- raising the touristic potential of the region: creating new touristic routes (river rafting, horse and bicycle routes), development of eco-tourism;
- sustainable tourism in the region will contribute to the development of small and medium-sized businesses: it will create new jobs and workplaces, promote the involvement of the local community, thus improving their welfare, and will give new life to the territory.

I want to believe that this treasure of the Ukrainian people will become the heritage of all mankind.

Roșia Montana – A Unique Mining Landscape

Adrian Crăciunescu, ICOMOS-Romania,
and Sergiu Musteață, ICOMOS-Moldova

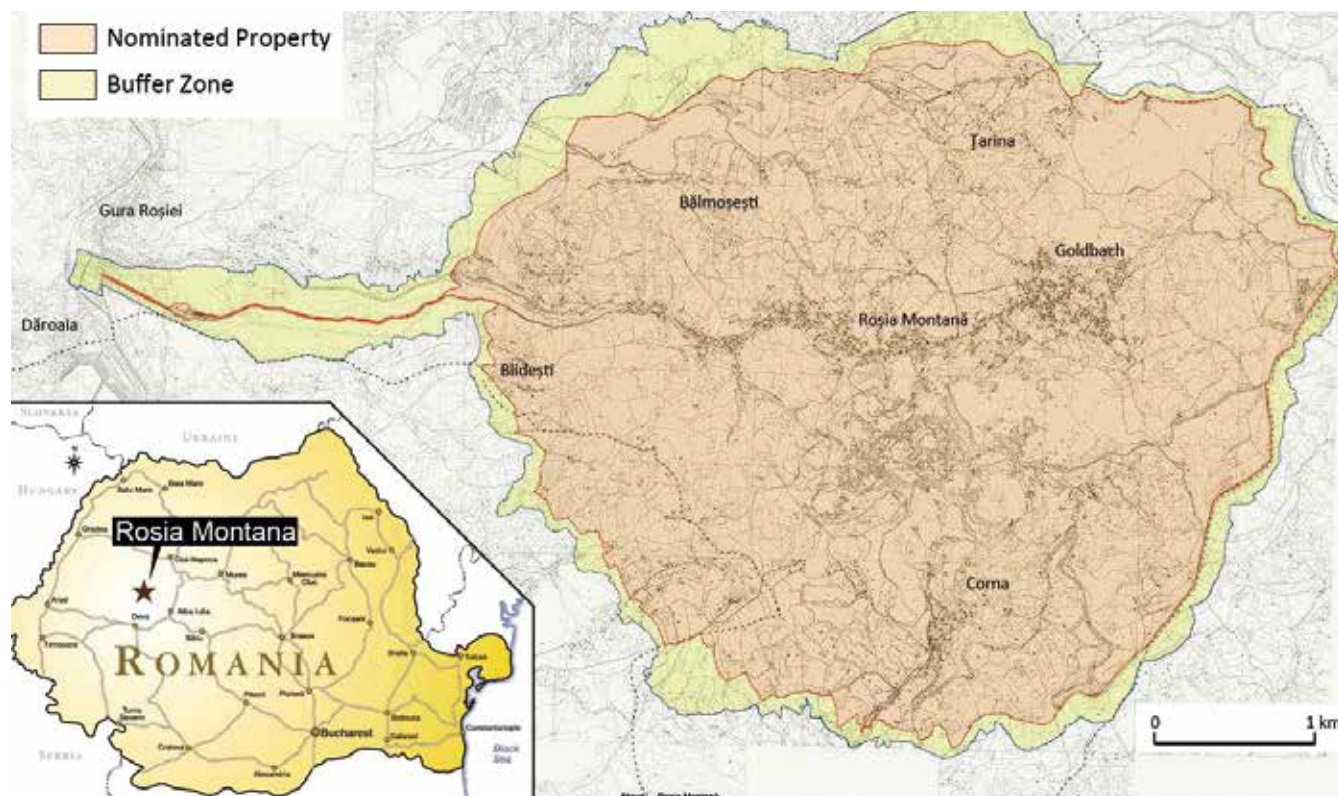


Fig. 1: Map of the Roșia Montana Cultural Landscape.

Sources: ICOMOS Romania / Gabriel Resources Ltd.

Roșia Montana has been the most active gold mining center of the Apuseni Mountains (the western part of Romania's Carpathians), from the earliest works in the Bronze Age to Antiquity, through the Middle Ages, all the way into modern times

and up to the recent past. Traditional, family, or small group-operated mining ended in 1948 with nationalization, and the subsequent industrial state-run mining ended in 2006. With that long history, in 2016, the National Institute of Heritage and



Fig. 2a-c: The mining heritage of Roșia Montana.

Photos: ICOMOS Romania

Ministry of Culture from Romania nominated the site on the UNESCO Tentative List and in 2017 presented a dossier for inscription in the World Heritage List.

Over the years, many Romanian NGOs, scholars and citizens supported actions aiming for the protection of Roşia Montană from destruction by improper economic and social measures planned, or already partly carried on, by local and central administration, and by a private mining company on site. Considering the high importance of its cultural heritage, ICOMOS Romania advocated for its inscription on the World Heritage List.

Following the recent submission to the World Heritage Centre, by the Romanian state, of the nomination dossier of the Roşia Montană Mining Landscape, ICOMOS Romania expresses its satisfaction for this measure that, whilst so late, is yet still in time to protect what we consider to be a most relevant heritage for the international community under the World Heritage Convention.

On behalf of ICOMOS Romania and ICOMOS Moldova we strongly support this nomination and argue for it from several considerations:

1. Considering risks linked to former and current support from various political and administrative groups of influence for a vast open pit mining project, involving immense risks to en-

vironmental safety and taking into account the accelerated rate of decay of the state of conservation of the site, noticing that all archaeological research carried on till now was of a rescue nature, observing that the population decreased drastically in recent years due to a private mining company policy of displacing people in order to have clear path for mining and processing four mountains where ancient roman mining galleries are located, we are convinced of the necessity of inscribing Roşia Montană cultural landscape directly in the List of World Heritage in Danger.

2. We consider that the boundaries proposed within the nomination dossier would serve the property well since we see Roşia Montană as a complex of cultural and landscape values that qualify it for inscription as a “cultural landscape”, having in its center the most valuable core which is the complex of roman mining galleries. We value the way the landscape was used over the centuries, likely since Roman times, in order to create a complex system of water management with the purpose of using the hydraulic power to run the mills processing the ore, long before the industrial revolution. It comes with the mix of populations, beliefs and other varieties of cultural exchanges over the time, reflected in the layout of the villages within the site boundaries and in their special vernacular architecture still standing.

3. Over the years we have recognized the fact that there are many gaps in scientific and historical knowledge about the site regarding periods such as the pre-Roman era or for the



Fig. 3: The cultural landscape of Roşia Montana.

Photos: ICOMOS Romania

early and late medieval times. Therefore, we consider that an interdisciplinary scientific community should be established without delay with the scope of further research of the site.

4. There is also the need to develop priority economic and social strategies for the site, beyond what can be provided in a management plan. We consider that the site is in need of a heritage-led “business plan”, an economically viable plan for sustainable development, as a realistic and achievable alternative for the constant pressure of the destructive model proposed for this place, the open pit mining.
5. Taking into account the previous points, we encourage the Romanian authorities and the international community to accept, respectively to provide assistance as an assistance package, following inscription within the list of endangered World Heritage. We believe that this help should not consist in funds but rather in the continued support of the ICOMOS Europe working group, and of ICCROM, so that by using Roşia Montană as a base and pretext for organizing various training courses by ICCROM, based on this real threatened landscape, we would be able to attract further interest from the international scientific community, thus in attracting future investments based on the undoubted exceptional scientific interest carried by this site.
6. We are expressing our belief that social and economic regeneration of the area around Roşia Montană can be achieved through a step by step process that has to be heritage-led, conducted in a flexible way, in order to achieve the goal of preserving local tradition as much as providing modern conditions for a prosperous life for the local community. We are convinced that a start-up process can commence with relatively modest financial and administrative means so that it would trigger a cautious yet steady process in the proper development of the site, this being a preferable situation as opposed to major and concentrated investments implemented in a very short time.

Conclusions

After years in which various scholars, organizations, civil society, along with much of the cultural elite of Romania, supported the universal value of Roşia Montana, non-inscription would have a devastating effect on our pro-heritage positions in general, by rejecting/minimizing the message of those who are lawyers of heritage against the continue assault of those promoting unsustainable development plans based on destruction of the site.

Non-inscription of Roşia Montana in the World Heritage List would give an impulse to promoters of surface exploitation of all cultural and landscape resources, with a heavy environmental impact including cyanide-based technologies. It could be an encouragement to further promote annulment of the scheduling as national monument in order to have the legal option to continue with the open pit mining, leading to **rapid and irreversible destruction of heritage**. At the same time, a possible lack of inscription would decrease the confidence of the Romanian society in this idea and diminish the chances of international cooperation for the conservation of the site.

We welcome the recommendation of ICOMOS to inscribe the Rosia Montana site in the World Heritage List and World Heritage List in Danger. The main argument of the recommendation is that “the good is threatened by a proven, precise and imminent danger, likely to lead to a significant loss of historical authenticity and cultural significance.”

We strongly hope and recommend that the World Heritage Committee will take these recommendations into account and will include Roşia Montana in the World Heritage List. This decision will contribute to a better international recognition of the value of the site. and will represent a crucial means to ultimately protect and promote this cultural landscape for the benefit of its future sustainable and its community.

The Alarming State of the Natural and Culturo-Historical Region of Kotor, Montenegro

Aleksandra Kapetanovic, EXPEDITIO Center for Sustainable Spatial Development, and Marija Nikolić, Friends of Boka Kotorska Heritage Society



The Natural and Culturo-Historical Region of Kotor

The Natural and Culturo-Historical Region of Kotor (hereinafter referred as Kotor Region) is located in the Boka Kotorska Bay, a unique fjord-like bay on the Adriatic coast of Montenegro. The property was inscribed on the UNESCO World Heritage List in 1979, encompassing the best preserved part of the bay, covering its inner portion with the area of around 12,000 ha, while in 2011, its buffer zone was defined as encompassing the whole Bay of Boka Kotorska. The Outstanding Universal Value of the Kotor Region *"is embodied in the quality of the architecture in its fortified and open cities, settlements, palaces and monastic ensembles, and their harmonious integration to the cultivated terraced landscape on the slopes of high rocky hills."*¹ Kotor Region is inscribed as a cultural property, and in 2008, the World Heritage Committee invited the State Party to *"consider re-nominating an enlarged area around the bay as a cultural landscape"*².

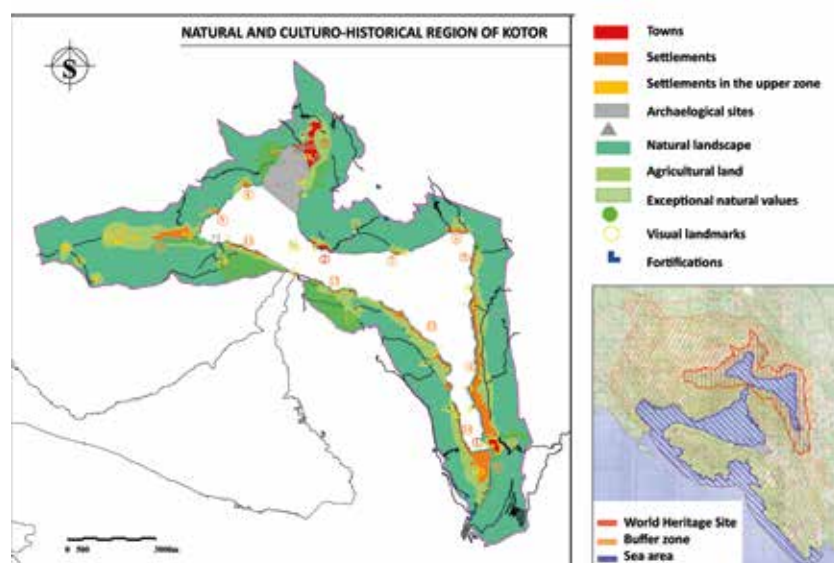


Fig. 1: The Natural and Culturo-Historical Region of Kotor.

Map: Management Plan of the Natural and Culturo-Historical Region of Kotor, Ministry for Culture of Montenegro, Cetinje 2011

The threat of uncontrolled urbanisation to the property's OUV

For the last 15 years, the Kotor Region has been under great pressure from excessive urbanisation, which is currently threatening to seriously impair its OUV. As early as in 2003 serious threats were identified for the first time, i.e. the risks that excessive and uncontrolled urbanisation has posed to the exceptional universal value of the property³. As the process of accelerated urbanization was not possible to control and halt, it has led to worsening of situation over the last few years.

The seriousness of situation was confirmed by the decision adopted at the 38th session of the WH Committee in Doha in 2014 which included the article stating: *"Halt any building or infrastructure development projects within the property until such time as the necessary planning and management tools have been finalized and put into practice"*. However, despite the advisory bodies' clear recommendations this article was

re-formulated into: *"Encourages controlled implementation of developments ...and requests the State Party to undertake Heritage Impact Assessment to ensure that no impact occurs on the Outstanding Universal Value."*⁴

Given that the negative trends in Kotor Region have not been halted, the WH Committee adopted, at its session held in Istanbul in 2016, Decision 40 COM 7B.54 regarding the management, planning and protection of Kotor Region, and conducting the necessary Heritage Impact Assessments.

The current situation

Despite formal attempts of Montenegro to abide by the decisions of the World Heritage Committee, which have been reflected in the adoption of an *Action plan for the implementation of Decisions relating to Kotor Region adopted in Istanbul*

1 Retrospective Statement of Outstanding Universal Value, 38COM 8E - Adoption of Retrospective Statements of Outstanding Universal Value

2 32 COM 7B.101, Natural and Culturo-Historical Region of Kotor (Montenegro) (C 125)

3 Decision: 27 COM 7A.27, <http://whc.unesco.org/en/decisions/580>

4 Decision: 38 COM 7B.29, <http://whc.unesco.org/en/decisions/6016>

in July 2016, the overall situation related to Kotor Region's protection and planning is still very alarming.

The Government of Montenegro, at its session held on 30 March 2017, and based on the Action Plan adopted in February 2017, adopted the Decision on construction moratorium in the Kotor Region valid until the adoption of Spatial Plan of the Municipality of Kotor. Despite this decision, in reality, the construction has not been stopped, which is evidenced by numerous active building sites. Although it is justified as only construction of buildings that obtained building permits before the Government's Decision on construction moratorium is approved, these interventions are substantial and have a profound impact on the OUV of Kotor Region.



Fig. 2: Urbanization of the settlement of Dobrota, which has completely covered the elements of traditional architecture and transformed cultural landscape.

Photos: Expeditio

Following Decision 40 COM 7B.54, Montenegro has submitted the State of Conservation Report for the Kotor Region for 2017, but the data provided in the document are given in a way that does not reflect the real state of the Kotor Region.

Decision 40 COM 7B.54 strongly requested the State Party to "proceed with promptly finalizing the appointment and enforcement of the Management Council with a clear mandate to ensure effective coordination in management". The Government of Montenegro appointed a new Council for the Management of Kotor Region in September 2017. Although this new Council is more active than the previous one, it has proved that the existing management system is not functional and suf-



Fig. 3: Construction of a new residential and touristic-apartment settlement at Kamp site in Dobrota.

Photos: Expeditio

ficient, and at its session held on 16 January 2017 the Council agreed that *"it is necessary to make changes to the legal and institutional framework that defines the mechanisms and bodies for the management of Kotor Region, in accordance with the Management Plan of the Region"*.

Decision 40 COM 7B.54 also requested the State Party to *"review and harmonize all planning instruments through a comprehensive Heritage Impact Assessment (HIA)"*. The Comprehensive HIA was carried out and adopted on 10 November 2017 by the Government of Montenegro. The question is: How is it possible that the Government of Montenegro adopted this document before submitting it to the World Heritage Centre for a

review by its advisory bodies when Decision No. 40 COM 7B.54 clearly stated so? In spite of that, the newly adopted amendments to the Law on Protection of the Natural and Culturo-Historic Region of Kotor state that the HIA should be adopted by the Government of Montenegro “for a period of five years”. In addition, it is important to note that the HIA was adopted even before the Study on the Protection of Cultural Properties in the Municipality of Kotor (SPMK) has been adopted.

The **Study on the Protection of Cultural Properties in the Municipality of Kotor (SPMK)** is the main document for the protection of the Kotor Region in which the Region’s OUV attributes have been mapped for the first time and the measures for their protection proposed. The Study was completed in May 2015 but it was not officially adopted before 28 November 2017. Meanwhile, from 2015 to 2017, activities were realized that contradict the measures defined by the Study. A planning document was adopted enabling construction in the Glavati area (Local Study of the Location Glavati-Prčanj), a new building was built at the Verige site and the construction of a touristic settlement in the Kamp area began, all of which is contrary to the measures defined by the Study.

Decision 40 COM 7B.54 further requested the State Party to finalize the Study of Protection of Cultural Properties for the Special Purpose Spatial Plan for the Coastal Area (SPSPCA). SPSPCA, which encompasses the area of six coastal municipalities in Montenegro, was finished in July 2017. However, neither has it been harmonized with the SPMK as the main document for the protection of Kotor Region, nor does it treat the Region in an adequate methodological way. The annex of the State of Conservation Report contains a summary of the SPSPCA. In the graph showing the *Area/percentage of cultural assets and recorded objects with potential cultural values* it is stated that the Study encompassed the area of six municipalities with a total surface area of 150.457 ha, and that the “*area of scope of cultural assets*” is 2.370,69 ha.⁵ This shows that the Kotor Region included on the World Heritage List, with an area of 12.000 ha and its buffer zone of 36.491 ha has not been treated as a whole within the plan.

Decision 40 COM 7B.54 strongly requested the State Party to “finalize the **HIAs for the Verige Bridge** and for any alternative options to it as a basis for developing the Regional Transport Strategy”. As far as the bridge over the Verige strait is concerned, a HIA has not been developed, and on 2 February 2017 one of the topics in the agenda of Government of Montenegro was “Oral information about negotiations with the Republic of Azerbaijan related to the construction of the Verige bridge”⁶.

Decision 40 COM 7B.54 requested the State Party to “*undertake an independent HIA for the tourist facility at Glavati – Prčanj for which a Local Study of Location has been adopted.*” A HIA for the tourist facility at Glavati – Prčanj has not been undertaken. Despite Decision No. 40 COM 7B.54, on 27 March 2017 the Municipality of Kotor launched an International anonymous competition for a preliminary urban and architectural

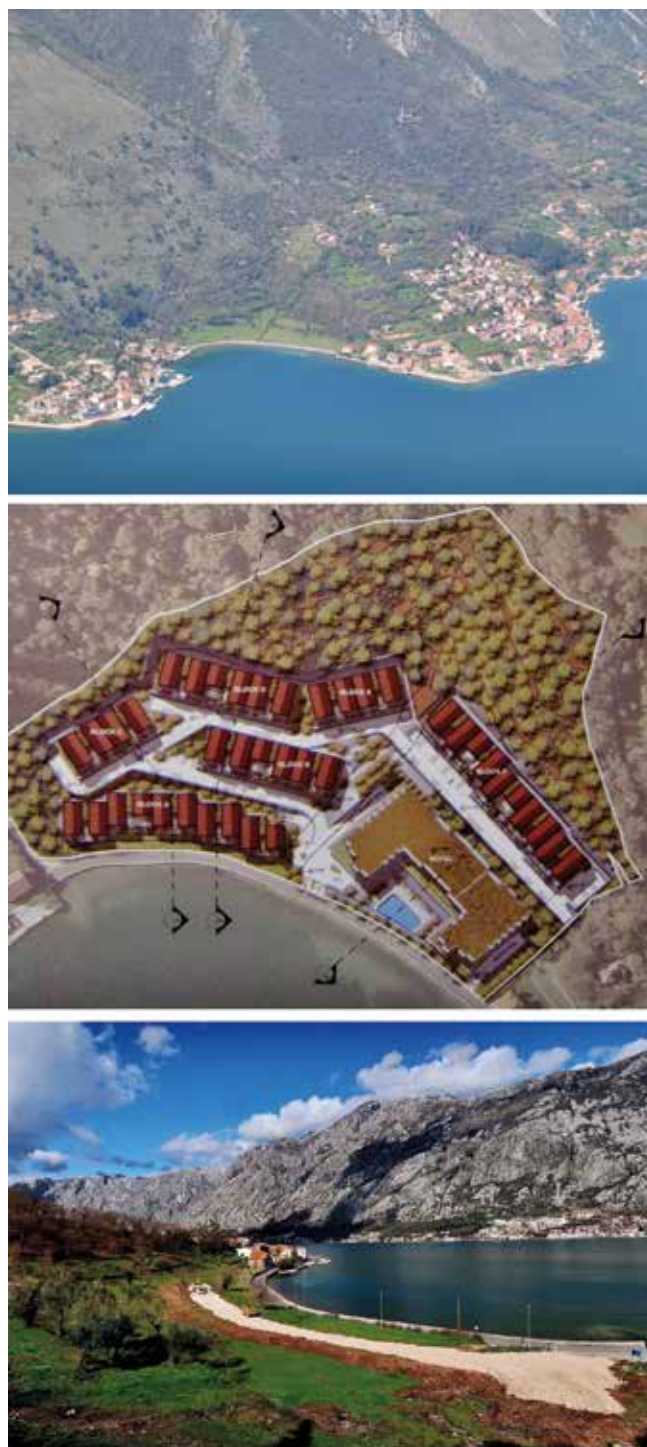


Fig. 4: The Glavati Cove: A - The View of the Glavati Cove, B – First-awarded design at the International Competition for the preliminary urban and architectural design for a 5-star tourism complex; C - Preparation works for the displacement of high voltage electrical cable in April 2018.

Photo: Expeditio

⁵ State of Conservation Report, page 149

⁶ Information can be found at the website of the Government of Montenegro http://www.gov.me/sjednice_vlade_2016/11

design for a five-star tourist facility on urban plot UP6, block 2, within the framework of the Local Study of Location “Glavati – Prčanj”. Although the competition announcement cited: *“If the investor decides to develop technical documentation in accordance with the provided guidelines, the documentation will have to be used with the previously stated Assessments (a comprehensive independent HIA and an independent HIA for the planned touristic complex) even in the case that these Assessments do not allow construction on the said location.”* we consider it alarming that the competition was announced before a HIA has been undertaken and that the jury considered the entries and selected winning designs, the realization of which would obviously impair the attributes of the OUV of the Kotor Region (the planned touristic complex will have a total surface area of 40.000 m²).

In the meantime, on 25 January 2018, the company Hexagon Investments Ltd., which is the current owner of the land in Glavati, submitted a request to the Ministry of Sustainable Development and Tourism for issuance of urban and technical conditions for the removal of the existing power cable lines. This request states: *“On the said land our company intends to build a five-star hotel-resort. The project is worth EUR 150 million. Before we begin with the planned investment on this site it is necessary to remove the existing 10kV power line cables that go through our privately owned cadastral plots....”*. At the end of March 2018, preparation works for the removal of cable lines already began, although a HIA for this site has not been carried out.

Conclusions

Despite the formal attempts of Montenegro to improve the system of protection, planning and management of the Kotor Re-

gion, the situation in the area is alarming, and everything that is happening there shows that the mechanisms necessary for the protection of Kotor Region’s OUV have not been established. This text states only some key problems out of many of them that exist in the area.

Legislative and institutional changes that happened have completely weakened the system of protection of the Kotor Region, primarily because the institution that was formed in the Region following its inscription on the World Heritage List has now been transformed and left bereft of its competences and authority. The state of planning is best described by the conclusions of the HIA which say that *“the attributes of the OUV will change and that the OUV will be extremely endangered, if not fully devastated, if all spatial planning documents which are adopted for Kotor Region and buffer zone are fully implemented.”* Unfortunately, the new Law on Spatial Planning and Construction of Structures, adopted in September 2017 despite the opposition of the whole professional and layman public in Montenegro, brings changes that make the system of planning even more non-transparent, chaotic and inadequate, especially when it comes to complex cultural properties, such as Kotor Region.

Furthermore, it has become evident that the existing management system is not functional and adequate for a complex area, such as Kotor Region, and that it is necessary to establish new management mechanisms and bodies.

If Montenegro does not start seriously and truthfully, rather than just formally, addressing the issues related to protection, planning and management of the Kotor Region, we seriously risk losing the OUV of Kotor Region and threaten its status on the World Heritage List.

Lake Ohrid: Post-Reactive Monitoring, Progress and Stagnation

Sonja Dimoska and Daniel Scarry (Ohrid SOS)



Lake Ohrid, straddling the border of Macedonia and Albania, is thought to be the most species-rich inland water on Earth by surface area¹. As one of the oldest lakes on the planet, Ohrid has existed for enough time both to safeguard relict species from the tertiary period and evolve entirely new ones of its own². To the east is Lake Prespa which is connected to Lake Ohrid via numerous underground channels emerging at the latter in highly unusual coastal and sublacustrine springs, supplying over 50% of its water³. Named Mount Galichica, this karstic massif is itself a 5000-species national park, Key Biodiversity Area, Important Plant Area and Prime Butterfly Area.

Unsurprisingly, these extensive natural resources also exhibit some of the oldest human settlements in all Europe. With uninterrupted development stretching back to prehistoric times, there are 244 archaeological sites most notably in the city of Ohrid's urban core⁴. In accord with their exceptional natural value, Lake Ohrid and 72% of National Park Galichica achieved designation as a UNESCO World Heritage Site in 1979 under Criterion (vii). One year later, the area's cultural values were also inscribed on the World Heritage List under Criteria (i), (iii) and (iv), which now manifests an 83,350 ha mixed property under the title Natural and Cultural Heritage of the Ohrid Region². Alongside the World Heritage Site, in 2014, Lake Prespa was designated with Lake Ohrid and Mount Galichica as the UNESCO Ohrid-Prespa Transboundary Biosphere Reserve.

Threats

Recent years have witnessed steady deterioration of Ohrid region World Heritage. Uncontrolled urbanization, both legal and illegal, has combined with overfishing, a failing sewerage system, wetland degradation, eutrophication, mismanagement of hydroelectric dams, non-native species, pollution, wildfires



Fig. 1: Map of Lake Ohrid. Map:

© macedonia.org

and inadequate solid waste disposal to push Lake Ohrid towards a biodiversity crisis⁵. Emerging from a context of institutional incapacity, poverty, unemployment, a lack budgetary resources, poorly coordinated strategic and legal frameworks, politicization, intransparency, and low decision-maker aware-

1 Albrecht, C. & Wilke, T. (2008) Ancient Lake Ohrid: biodiversity and evolution, *Hydrobiologia* 615: 103-240.

2 UNESCO World Heritage List, Natural and Cultural Heritage of the Ohrid region (available 9/3/2018)

3 Lorenschat et al (2014) Recent anthropogenic impact in ancient Lake Ohrid (Macedonia/Albania): a palaeolimnological approach, *J Paleolimnology*, 52:139.

4 Natural and Cultural Heritage of the Ohrid Region World Heritage Site Management Plan: 188-194.

5 Kostoski, G. et al (2010) A freshwater biodiversity hotspot under pressure – assessing threats and identifying conservation needs for ancient Lake Ohrid, *Biogeosciences*, 7, 3999–4015.

ness⁶⁷, these threats reached unprecedented heights in plans for a series of mega-projects aimed predominantly at the tourism industry, which sought to drain and concrete Studenchishte Marsh, the last of Lake Ohrid's shoreline wetlands, construct a full-scale ski-resort in National Park Galichica, and expand transport infrastructure via two roads (A3 express and A2 highway), a railway and even a sports airport.

Consequently, in April 2017, a Joint Reactive Monitoring Mission from IUCN, ICOMOS and the World Heritage Centre took place to ascertain whether the property should be placed on the List of World Heritage in Danger. With a progress report requested for February 1 2018, it provided 19 recommendations to avoid this fate⁸, including cancellation of the ski-resort and abandonment of two proposed A3 express road sections. These recommendations were further underlined by the World Heritage Committee in Krakow 2017, which requested complete compliance⁹. The following is a summary of the current situation.

Progress Report: Joy, Hope and Stagnation

The Macedonian government belatedly adopted the aforementioned progress report at its 54th session on 13 February 2018. Two days later, the report was submitted to the World Heritage Committee, being available to the Macedonian people in the Macedonian language only on February 23 after pressure from Ohrid SOS, a local environmental citizens' initiative.

Contents reveal general, though incomplete, alignment with the Reactive Monitoring Mission's requests. Most positively, the A3 express road has been cancelled and a proposal to reduce the level of protection in certain areas of National Park Galichica, which would have facilitated the ski-resort project, has been quashed¹⁰. This was confirmed by the 57th Session of the Macedonian government in March 2018, which halted a process to change the management plan for the national park.

On the other hand, the railway route Kicevo–Radozhda–Lin (Albania), part of pan-European Corridor 8, will most likely not be amended despite World Heritage Committee advice to analyse other routes¹⁰. In regard to the A2 highway (Trebenishte–Struga–Albanian border), the government has undertaken responsibility for planning passage routes for animals and people but does not provide a direct response to the committee's advice to refrain from building a new dual-carriageway Struga–Albanian border and upgrade the existing road to expressway standard instead¹¹.

The exact route for this section is yet unknown. Surprisingly, the State Party seems to have completely neglected the request for an assessment of the cumulative impact of the railway and the A2 highway with regard to OUV⁹. In consequence, the potential negative effects of the two projects on Lake Ohrid's north-west shore needs close examination and monitoring.

Some recommendations are delayed and others are just at the beginning stage. One example is SEA which currently awaits revision of the Ohrid Region Management Plan. It should be com-

6 European Commission (2016) Former Yugoslav Republic of Macedonia 2016 Report

7 Ministry of Environment and Physical Planning (2014) Fifth National Report to the Convention on Biological Diversity.

8 Report of the Joint World Heritage Centre/ICOMOS/IUCN Reactive Monitoring Mission Report to the World Natural and Cultural Heritage of the Ohrid Region (2017).

9 World Heritage Committee Decision 41 COM 7B.34

10 Progress Report on the Implementation of the Recommendations of the Decision 41 COM 7B.34 on the Status of the Natural and Cultural Heritage of the Ohrid Region (2018)

11 IUCN (2017) World Heritage Outlook, Natural and Cultural Heritage of the Ohrid Region



Fig. 2: Aerial view of the plot of the new hotel before and after construction.

Photo: SOS Ohrid

pleted by October 2018¹¹. Another important unresolved issue is the UNESCO mission recommendation for the “exploration of an idea to re-divert Sateska back into the Crn Drim River.”⁹ Currently, the river flows directly into Lake Ohrid and represents the biggest source of eutrophication-causing phosphates, yet there are few indications of State Party intentions to resolve the issue with the urgency required¹¹.

Of further concern is the complete omission of any reference to the Reactive Monitoring Mission’s Recommendation to “put in place a moratorium on any coastal and urban transformation within the World Heritage property, at least until all relevant planning documents (....), and effective control mechanisms are established”⁹. This oversight displays ignorance of IUCN’s conclusion that legal and illegal constructions are one of the main current threats to the property’s integrity, especially in combination with the failing wastewater and solid waste systems¹¹.

The 2018 Progress Report merely outlines the procedure by which illegal buildings can be legalized¹¹. As such, it either wilfully sidesteps the need to strengthen the effectiveness of the legal system or demonstrates a dangerous lack of awareness of its failures, despite IUCN stating that enforcement of law is “weak”¹² and the Joint Reactive Monitoring Mission emphasizing that an overhaul is necessary⁹. Such misgivings are underlined by the State Party’s one-year extension to the deadline for making illegal buildings lawful¹ and its lack of action to reconsider amendments to the Law on Management of Illegal Buildings (Official Gazette of RM No. 124/15), which were enacted by the previous government in 2015 to enable the legalization of objects constructed within the strictly protected coastal zone of natural and artificial lakes and rivers without the need for an opinion from the Ministry of Environment and Spatial Planning. (Incidentally, the present ruling party opposed these amendments when in opposition¹³, yet has not sought to reverse them now it is in office.)

Lagadin

The danger posed by uncontrolled and illegal building on the sensitive Lake Ohrid shore is aptly demonstrated by the current situation in the village of Lagadin. Based on the new General Act for Villages without Urban Plan, a permit for construction of a 5-storey hotel within the strictly protected 50-meter green belt of the lake shore was issued in 2016¹⁴.

Construction started in December 2016, but was halted by the State Inspectorate for Construction and Urbanization after Ohrid SOS notified that the hotel was in conflict with 12 laws



Fig. 3: Civil Society protest in front of the new hotel construction in Lagadin.

Photo: SOS Ohrid

and 1 bylaw. The investor then resumed construction activities without a valid permit several times in 2017 and briefly in February 2018, enabling the building to advance significantly. Of note, the hotel project is linked to TUI Netherlands, a Dutch tour operator which has confirmed an arrangement to supply customers once the building is complete¹⁵. Despite having been informed of the situation with the hotel and the Joint Reactive Monitoring Mission Report, TUI has been unresponsive to communication on the topic.

Commission for Management of the Natural and Cultural Heritage of the Ohrid Region

A Commission for Management of the Natural and Cultural Heritage of the Ohrid Region was finally established on February 1 2018. Unfortunately, serious shortcomings are evident in

- (1) the composition of the commission;
- (2) the constitution process; and
- (3) the selection of civil sector representatives.

Namely, the commission seems to contain individuals either linked to the decision-makers that supported proposals for mega-projects that would have threatened the Ohrid region’s OUV or who expressed little opposition to these projects. Considering that the committee’s purpose is to “control development pressures and interventions at the property”, these shortcomings are highly relevant. With no transparency, the public and other interested parties received no information about the election and constitution until the day the commission was

12 25th Session of the Government of the Republic of Macedonia 29/8/2017.

13 SDSM statement reported by Telma 27/8/2015.

14 Prof. Miroslav Grcev, Expertise on General Act for Lagadin Village. (Grcev is a Head of the Department of Urbanization at the Faculty of Architecture, Uni St. Cyril & Methodius, Skopje.)

15 Letter addressed to Ohrid SOS dated/received 2017/2/10 from Mr P. A. Rijnfeld, Attorney-at-Law for TUI.



Fig. 4: View of the Studenchishte Marsh.

Photo: K. Amaudov

established. Members of the civil sector were selected by recommendation instead of open application, all of which is undemocratic, in violation of rights to equal participation and the continuation of an underlying culture of unaccountability from which substandard management of the World Heritage Site emerges.



Proposed zoning of Studenchishte Marsh according to the Integrated study
 Light green – Zone of active management
 Darker green – Zone of sustainable use
 Darkest green – Zone of strict protection

Fig. 5: Proposed zoning of the Studenchishte Marsh.

Map: SOS Ohrid

Studenchishte Marsh

Moves to establish Studenchishte Marsh, the last remaining shoreline wetland, as a Monument of Nature under national law and include it within a Lake Ohrid Ramsar site have stalled. Ohrid Municipality is holding out for another valorization of the wetland to be conducted before moving forward with protection, even though a 2012 report by an expert team has already recommended that 63.97 hectares should receive Monument of Nature designation¹⁶ and existing data is more than sufficient to trigger several Ramsar criteria for Lake Ohrid. This both delays the nomination process and raises fears that ways to avoid protection

of the full wetland area are being sought as in other Macedonian ecological management that are still awaiting protected status after 15 years or longer⁸.

Conclusions

1. Clear positive steps have been made with cancellation of the A3 express road and ski-resort. However, significant threats remain.
2. Studenchishte Marsh, a vital wetland habitat and natural filter for Lake Ohrid, still has not secured an appropriate level of protection despite the IUCN's identification of wetland revitalization as a key site need¹².
3. Ohrid Municipality continues to display inability and unwillingness to deal with illegal construction. Strong business interests, corruption and the same cadre of individuals holding positions almost for life inhibit meaningful change. An overhaul of power structures and the legal framework is therefore required. In the meantime, Reactive Monitoring Mission Recommendation 6 for a moratorium on construction should be implemented immediately.
4. A deficit in understanding of environmental issues and the importance of ecosystem services, particularly their functions for the tourism industry, is evident among both decision-makers and the business community. Greater awareness must be secured to prevent future ill-conceived plans for the Ohrid-Prespa region.
5. The information flow to and fair involvement of civil society still requires an upgrade, even though some progress has been made.

16 Spirovska, M. et al (2012) Integrated Study on the State of the Remains of Studenchishte Marsh and Measures for its Revitalization, Dekons-Ema Environmental Management Associates, Skopje, Macedonia.

Brave Heart

Tamar Gelashvili

At 2,200 meters above sea level, the community of Ushguli in Georgia's region of Upper Svanetia is the highest settlement in Europe. With its medieval churches and murals, unique architecture of defensive towerhouses, harmonious complexes of buildings, historical cultural landscapes, interesting customs, traditions and cuisine, it is not only Georgia's but also the world's property.



MOUNTAIN FORTRESS: Georgia is in Asia but sees itself as part of Europe. Upper Svaneti, where this story is set, was never conquered by outsiders. Its population, now perhaps 11,000, slightly more than that of Lower Svaneti, has fallen as people have left for better jobs. Yet more tourists are coming, mainly trekkers, climbers, and skiers who are spreading the word about its wild terrain.



Fig. 1: Map of the Upper Svaneti World Heritage Site and its location in Georgia. Other than the name and its categorization as a cultural landscape would indicate, the WHS constitutes only a small fraction of the region. The Google Earth image shows the location of the WHS within the Ushguli basin.

Maps:
National Geographic, UNESCO, M. Lenk



Fig. 2: The village of Chazhashi.

Photo: Stephan Doempke

The small village of Chazhashi makes up the core of the World Heritage Site. It is surrounded by a buffer zone consisting of the villages of Chvibiani and Murkmeli and their hillside pastures (see Fig. 1). The site is becoming more and more attractive for tourists. But what are UNESCO's or Georgia's levers to protect it, and is it on the agenda to protect it from various threats?

The traditional Svanetian vernacular structures, which date from the 9th-11th century, have different purposes. In the living house - *machubi* – still live the descendants of that family who originally built those buildings. The towers were used for defense during armed conflicts. These are the towers that are decorating the most beautiful views of Svaneti. Today they need relevant maintenance, which requires finances and knowledge from the population and government. The lack of these resources has led to a chain of complex problems over years, and not only for the towers. Only 12 of the original 35 towers have survived.

According to legend, the name Ushguli means "brave heart". Perhaps it would not be exaggerated to say that the local population needs a brave heart today to deal with the problems of everyday needs. The population in Ushguli, as locals say, has been shrinking due to severe socio-economic conditions in an extremely harsh natural environment and remote location.

With the eyes of an Ushgulian

Gia Nijharadze, an inhabitant of Chazhashi, gives a close account of Ushguli's tribulation and reality:

"There are seven families living here in Chazhashi nowadays. In 1980 we probably were twenty families. It is a hard economic situation. There is a lack of teachers in the school. Agriculture is laborious. Our subsistence basically are breeding and potatoes. The market is far from us, and it is a problem to get there to sell our products; it is getting much more expensive. Roads are closed during heavy snowfall. It was closed in December [2017] for a week. It was said that they were going to construct a sewer in Chazhashi, but nothing has been done in this regard yet, it's a terrible situation! Drinking water and electricity are a problem, especially in winter. The electric cable poles were erected in 1976. Accidents are frequent due to heavy snowfall.

We have blackouts even in cloudy weather. In bad weather either in winter or in spring Ushguli is cut off from the rest of the world. In September it's already freezing here.

There are about 12 towers in Chazhashi village and a few more *machubi* [living buildings]. Some of the towers have cracks, some are tilted, but mostly they have roof problems. My tower is three floors, it is crashing, and the rain is dripping down. For now somehow, we have wintered over, but ... this year I think it will fall apart ... The roof of the tower standing next to it has already collapsed. Because the [wooden roof construction] material was rotten, it could not endure the weight of either snow or shale. This is the third tower in this condition. These towers got new roofs in 2001, and then they were not touched by a human being. The same situation prevails in the village of Murkmeli."



Fig. 3: This inhabitant of Chazhashi explained that he saw his *machubi* collapse in front of his eyes because ICOMOS Georgia did not allow him to intervene, but didn't do anything about it either.

Photo: Stephan Doempke

From 2014 to 2017, the National Agency for Cultural Heritage Protection has restored 29 buildings in Chazhashi, including towers and *machubis*. Nevertheless most of the towers in the community of Ushguli, and *machubis* are damaged or on the edge of ruin. Their owners have been demanding reinforcement and rehabilitation for years.

Inactivity vs Activity

Restoration of the damaged tower is often a dilemma. The local population can not restore their damaged buildings on their own because according to the law, they need a restoration project. The project can not be written without help of specialists because it requires specific knowledge. Specialists need financial support. Further, it is necessary to obtain a permission from the government for the implementation of the project.

In all this, the owner is often limited by poor financial possibilities. These were the unfortunate reasons for many collapsed towers in Ushguli. For example, the owners of a tower in the village of Chvibiani – Charkviani's family, alerted the local and central governments about the critical state of their tower a few years ago, but the tower received attention only just after it collapsed in June 2017.

The other side of the dilemma coin is inappropriate intervention without permission from the government, depriving the monuments of their values. This is mainly because of poverty and lack of awareness of the local population, as well as a weak monitoring system. The head of the German organisation “World Heritage Watch”, Stephan Doempke, visited Ushguli last year and observed that “other people don’t wait for officials but start helping themselves. Then they put in new modern windows which don’t fit with the historic style. They simply don’t know better, or they cannot obtain other windows.”

The government response

“The local population has been increasingly applying for new constructions. On the territory of the monument, the status of agricultural land plots is changing into non-agricultural plots. This circumstance creates a prerequisite for new construction, which in itself is a dangerous precedent and increases the unfortunate danger of the loss of integrity and authenticity of the Zemo Svaneti World Heritage Monument and therefore its removal from the World Heritage List. For example, new constructions near the territory of Chazhashi, the new settlement “Lamjurishi”, where in recent years many buildings have been built that are inappropriate for the Ushguli landscape and historically established environment.”

This is a quote of the National Agency for Cultural Heritage Protection from the explanatory note on why a construction moratorium had to be declared in the Ushguli community.

The Government of Georgia shared the above arguments and on May 19, 2017, a special regime of urban and land-use regulation was launched in the Ushguli community. Except planned rehabilitation works on the monuments, new construction permissions will not be issued and all new constructions are banned till 2020. The Ministry of Economy and Sustainable Development has been tasked to elaborate plans for urban regulation and land use regulation of the Ushguli community. It informs that the draft document should be completed until November this year. The local municipality must approve it before December 1, 2019.

Merab Bochoidze, head of Georgia’s ICOMOS National Committee, explains that ICOMOS Georgia works on a rehabilitation project of houses and infrastructure in Chazhashi village: “Some of the houses are abandoned, some of them have lost their face because of inappropriate intervention. ... And the infrastructure! Just in rainy weather you will fall into the mud and manure.”

Nikoloz Antidze, head of the Agency for Cultural Heritage Protection, says that the Chazhashi rehabilitation project will probably be completed in 2021. The project encompasses infrastructural works, including the improvement of water supply, sewage systems, internal paths, etc. A Management and

Conservation Plan of Chazhashi was prepared in 2001 by ICOMOS Georgia but was not implemented. The Cultural Heritage National Agency cannot explain why. They claim, however, that after rehabilitation has been completed those old documents will be updated based on a new reality.

Mr. Antinidze explains that 7, 8 or 10 objects will be rehabilitated in Chazhashi per year, depending on climatic conditions and the severity of damage of the buildings. The infrastructural part of the project is ready, and has been sent to UNESCO, but the final option is yet to be agreed.

As for the other three villages, general development and land use plans are presently being worked out. Work on a full rehabilitation project and management plan will start after 2021. Rehabilitation works are planned from June. According to the Agency, this year the Charkviani family’s demolished tower in Chvibiani village will also be reconstructed, which will cost about 150,000 to 200,000 GEL. Asked why the Agency could not find these funds before the collapse of the tower, the head of the National Agency of Cultural Heritage Protection, Nikoloz Antidze, responded: “In Zemo Svaneti we have identified 160 to 170 objects that require immediate and urgent rehabilitation. Here, partially also the population is not ready to contribute to day to day maintenance, they lack responsibility. If this was in place, we would not need to rehabilitate these towers so much.”

Lack of responsibility or lack of information?

According to Stephan Doempke, “not only many houses must be restored and saved from collapse, but also their owners must be taught how to repair them in a traditional way, and they must receive financial support to buy the more expensive traditional material instead of the cheap modern one. Furthermore, they should be rewarded for maintaining their houses in historic style by providing for them the most urgent necessities: running water, toilets, and heating.”

In 2016 the Ministry of Culture approved a “Cultural Strategy 2025” in which education and awareness-raising are among the leading directions. However, since 2016 the Ministry has not taken any action in Ushguli to raise the awareness of the local population.

Local resident Gia Nijharadze explains that after the number of tourists increased in Ushguli, people were more interested in tourism than in agriculture. Local residents need more information and assistance in order to maximize the benefit of tourism for each fellow citizen and not to damage the heritage values.

Weak administration on each level

The work of the state agencies is not coordinated at the local and central level. It means that not only the population, but the professional circles also need more information and cap-

acity-building, especially at the local level. Recent experience by NGOs in Zemo Svaneti showed that local residents, including municipal service and museum staff, do not understand properly what the world heritage status involves, and no public map exists showing the boundaries of the World Heritage property.

Who will help the locals to raise awareness levels, why not even a single event had been held with this purpose in Ushguli or why has the state not taken into consideration creating a management system as stipulated in the UNESCO report of 2014? The director of the Cultural Heritage Agency responds to this question:

“In early 2018 we created the Chazhashi Museum-Reserve, where we have already a head of this service, local inhabitant Giorgi Nijharadze, who has the task to be the intermediate link between the local population and the central government. We are going to take three more staff there. ... They inspect and give instructions to the local population to take preventive measures in time.”

But according to the law the Agency should have had agreements with the owners of the monuments for a long time.

As for UNESCO’s monitoring, since 1996 no World Heritage Monitoring Mission has arrived in Ushguli. The last report was published in 2014. What information does UNESCO have on how its recommendations are taken into consideration and what is the situation now in Ushguli, 22 years later?

In fact, since 1996, it has not been possible in the Ushguli community (of about 230 people) to know what the World Heritage Status means for their residents, how to get more benefit from tourism, to host tourists in a way that the authenticity of the monument would not be damaged by new buildings, to restore damaged towers in time and in the right way, that the municipality deny construction permits for the monumental historical-cultural landscape in order to prevent it from losing its authenticity, that the monitoring system works properly, that local professional circles of authorities and the population know where the site’s buffer and core zone start and end, for everyone to have taken their responsibility in the site’s management, to have identified and written an annual budget that could have been allocated to avoid problems which have led to the collapse of a number of medieval towers like a water drop principle over the years.

Photographic Documentation

Chazhashi (Core Zone)

All Photos by Stephan Doempke, taken on 27 October 2017.



The old bridge to Chazhashi and the entrance of the village.



The village front towards the creek, and a view of its roofscape.





Views of the village from the East.



Two of Chazhashi's towers.





Murkmeli (Buffer Zone)



General views of the village from West and North

Chvibiani (Buffer Zone)



Views of the buffer zone to the North and East of Chazhashi. Note the many new constructions between Chazhashi and Chvibiani.



Due to tourism development, many old buildings were modernized and new ones constructed. As a result, the village of Chvibiani has almost totally lost its visual integrity. The museum is about to collapse.



The Ahwar of Iraq: World Heritage in Peril

Toon Bijnen, Save the Tigris and Iraqi Marshes Campaign

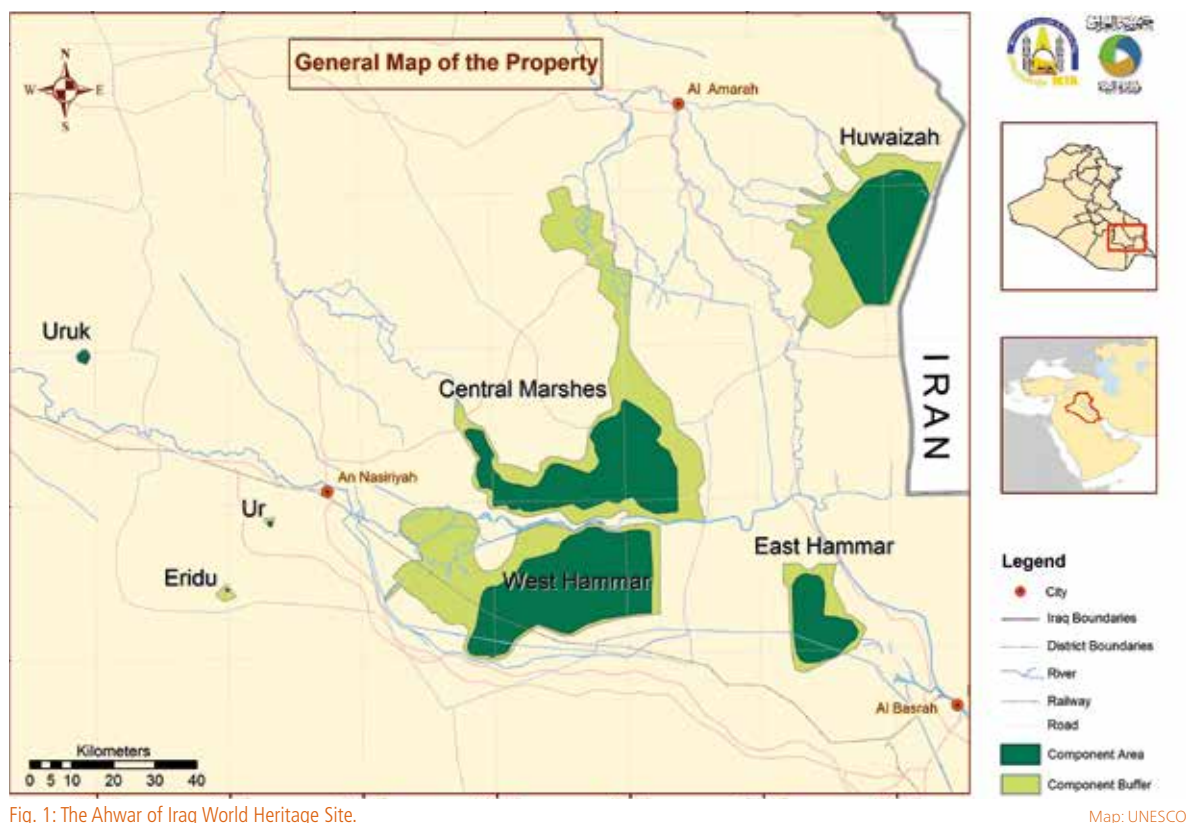


Fig. 1: The Ahwar of Iraq World Heritage Site.

Map: UNESCO

The World Heritage of the Ahwar of Iraq consists of three cultural sites and four wetland areas which are natural sites. The archaeological cities are Uruk, Ur and Tell Eridu, dating from 3000 B.C. while the wetlands of the Mesopotamian Marshes are one of the world's largest inland delta systems. In the 1980s, Saddam Hussein drained the Marshes for political reasons, in order to drive out the indigenous Shia population. At the beginning of the 2003 Iraq War, the Marshes were only 10% of their original size. After the war, they were partly restored with the help of environmental organizations. In 2016 the Ahwar were included in the UNESCO World Heritage List by Decision 40COM 8B.16.¹

Upon its inscription in 2016, UNESCO set forth a series of requests to the State Party of Iraq, in order to permanently secure the preservation of the Ahwar, based on 2016 ICOMOS² (cul-

tural heritage) and IUCN³ (natural heritage) recommendations. In November 2017 the State Party of Iraq submitted its first State of Conservation Report to UNESCO, to follow-up on the implementation of the UNESCO requests.⁴ In response to that report, this paper provides an overview of the concerns of civil society that remain and which need to be addressed both by the Iraqi authorities and UNESCO. The main concerns regard the natural heritage of the Ahwar, a complex natural site consisting of several locations over which civil society in the past year voiced its concern that it might be removed from the World Heritage List due to lack of comprehensive management.⁵

¹ <http://whc.unesco.org/en/decisions/6794>.

² whc.unesco.org/document/152768.

³ whc.unesco.org/document/152770.

⁴ whc.unesco.org/document/164963.

⁵ www.al-monitor.com/pulse/originals/2017/05/unesco-iraq-marshes-ahwar-world-heritage-list.html.

Water flows

After the deliberate draining in the second half of the 20th century, the wetlands of the Marshes now again face a myriad of threats. The main challenge is to ensure the minimum amount of water flows needed to sustain the Marshes, mostly from the Tigris River. UNESCO requested the Iraqi government to “conduct further studies regarding minimum of water flows needed”.⁶ Two main issues arise here: first, how to share the water resources within Iraq and second, how to deal with decreasing water flows from neighboring countries, mostly due to upstream dam construction. The report of the government is problematic as it names the issues but does not offer any road-map to deal with these.



Fig. 2: Dams in the Tigris-Euphrates River Basin.

Map: Keith Holmes <https://dspace.library.uvic.ca/handle/1828/2400>

Balancing the environment and agriculture needs within Iraq is a challenge,⁷ but there is no concrete plan how to address these issues. Within Iraq, in previous years water of the Tigris River has been used for agriculture at the expense of the Marshes. Authorities should offer concrete solutions to modernize irrigation methods and share water resources between different governorates and areas. Instead the government is looking towards the private sector for assistance to design long-term strategies and reforms in the management of water resources.⁸ It is doubtful whether neo-liberal reforms such as water tariffs⁹ can provide sustainability to the Marshes.

In Turkey, the Ilisu Dam is scheduled to start operating this year. Baghdad acknowledges that an agreement is needed with Turkey in order to sustain the water flows to Iraq and in particular the Marshes. At this moment, the government of Iraq has only received oral confirmation that Turkey will not disrupt water flows to Iraq, but no written agreement.¹⁰

On the eastern side of the World Heritage site, the Hawiza Marsh stretches across the Iraq-Iran border. UNESCO requested an agreement on the border crossing the Marshes, jointly signed by Iraq and Iran.¹¹ Iran unilaterally built an embankment on their side of the Marshes in 2009. This blockage has had a great negative impact on the habitat of the marsh as a whole as water cannot enter or exit freely anymore. There is hardly

any water discharge to Iraq due to water shortages on the Iranian side. Water close to the dyke is believed to be polluted due to oil industry installations and waste water on the Iranian side, raising more concerns in Iraq.¹²

Even though Iraqi authorities have reached out to Tehran in multiple visits, and dialogue has been further fostered with the help of the Ramsar Convention,¹³ there is no agreement yet on the border and water shares in order to sustain these marshlands. The Iraqi government will have to establish water agreements and transboundary agreements with Turkey and Iran in order not to jeopardize the water flows to the natural heritage of the wetlands.

Oil extraction

Oil and gas concessions require stricter regulation. UNESCO requested the authorities of Iraq to “ensure effective legal protection to regulate oil and gas concessions, and other potentially impacting activities in the buffer zones of the property”.¹⁴ A committee consisting of several Iraqi ministries is monitoring oil extraction. The Majnoon oil field in particular is critical since it partially overlaps with the Hawiza Marshes in the east of the country. Until recently, this oil field was exploited by Royal Dutch Shell. It developed a “biodiversity action plan” and an agreement “to support environmental conservation and management in Southern

⁶ <http://whc.unesco.org/en/decisions/6794>.

⁷ whc.unesco.org/document/164963.

⁸ <http://hydronova.tech/work/national-strategy-water-land-resources>.

⁹ <http://hydronova.tech/work/national-strategy-water-land-resources>.

¹⁰ <http://www.iraqicivilsociety.org/archives/8394>.

¹¹ <http://whc.unesco.org/en/decisions/6794>.

¹² <http://www.iraqicivilsociety.org/archives/7330>.

¹³ <https://www.unenvironment.org/news-and-stories/story/conserving-iran-and-iraqs-wetlands>.

¹⁴ <http://whc.unesco.org/en/decisions/6794>.



Fig. 3: Parts of the marshlands dry up seasonally such as on this picture. Hawiza Marshes, 27 March 2018. The delicate water regime of the marshes might be seriously disturbed by hydroelectric dams. Photo: Toon Bijlens

Iraq”.¹⁵ However, no impact assessment of oil extraction activities in this part of the Marshes is mentioned in the State of Conservation Report of the government.¹⁶ In September 2017, Shell announced it would leave the oil field,¹⁷ handing over the operations to the state-owned Basra Oil Company.¹⁸ The State of Conservation Report of the Iraqi government mentions several environmental impact assessment reports from oil companies “working in the vicinity of Southern Ahwar” but Majnoon is omitted.¹⁹ It is imperative that either Shell or Basra Oil Company commission a thorough assessment of the oil extraction activities on the marshlands.

Biodiversity and indigenous culture

In their report the Iraqi authorities acknowledge that preserving the traditional way of life and ecological knowledge of the Marsh Arabs while at the same time sustaining the biological and ecological diversity is a difficult balance.²⁰ However, illegal bird hunting and overhunting and -fishing need to be addressed. Currently, studies have confirmed the diversity within the heritage property – as requested by UNESCO²¹ – but no concrete measurements have been taken or have been proposed.²² It remains a challenge for local communities to make a living and to have access to local markets. Other challenges for the natural heritage that remain unaddressed are the impact of climate change (reduced rainfall), overconsumption of water,

and increasing natural pollutants such as eichhornia and agricultural pollutants in the water. The Iraqi government mentions pollution and over-extraction as challenges in its State of Conservation Report.²³

Road map for cultural heritage

Generally the preservation of the archeological sites of the Ahwar is developing well, with the assistance of Italian and German missions to develop conservation programs. The current focus now is mostly on mapping and studying the sites. Additional surveys still have to be completed, as requested by UNESCO.²⁴ However, there are already concrete plans for tourism infrastructure, which would be too soon without a long-term vision on a sustainable basis. First comprehensive conservation plans are necessary, including various options for intervention, for the monuments at risk. Permanent staff need more capacity-building and training, especially on site-level management.

The role of Iraqi authorities

Hampering the preservation process is the lack of ability of the Iraqi authorities to adopt and implement legislation, the lack of transparency and lack of involvement of civil society and indigenous communities. The Ahwar sites are legally protected, but in its State of Conservation Report the Iraqi government concludes that new laws need to be passed and existing ones need to be strengthened in order to protect the heritage from over-extraction or pollution. A draft, revised water law is currently still stuck in the Iraqi parliament,²⁵ and institutional power-sharing competencies between federal and regional authorities are not clearly distinguished in the constitution, especially with regards to Iraq’s internal water resources management and protection of heritage and environment. Implementation of the law remains a big challenge in Iraq.

Indigenous communities and civil society are not regarded as key partners in the development of a concrete long-term strategy. Various workshops and trainings have taken place in 2017,²⁶ but involvement of indigenous communities, civil society and other key stakeholders in the creation of a consolidated management plan is currently lacking. Activists, academics and civil society have on various occasions strengthened their collaboration in order to ensure better representation. An example of such collaboration is the “Our Marshes” civil society coalition which was established in May 2017 and presented its own recommendations to Iraqi authorities to preserve the marshlands (see documentation below).²⁷

15 <https://www.shell.com/about-us/major-projects/majnoon.html>

16 whc.unesco.org/document/164963.

17 <https://www.reuters.com/article/us-iraq-oil-shell/exclusive-shell-to-withdraw-from-iraqs-majnoon-oilfield-iraqi-oil-officials-idUSKCN1BN2XW>

18 <https://www.reuters.com/article/us-iraq-oil-shell/shell-to-hand-over-iraqs-majnoon-oilfield-by-end-june-2018-iraqi-oil-officials-idUSKBN1D817D>

19 whc.unesco.org/document/164963.

20 whc.unesco.org/document/164963.

21 <http://whc.unesco.org/en/decisions/6794>.

22 whc.unesco.org/document/164963.

23 whc.unesco.org/document/164963.

24 <http://whc.unesco.org/en/decisions/6794>.

25 whc.unesco.org/document/164963.

26 whc.unesco.org/document/164963.

27 <http://www.iraqicivilsociety.org/archives/7032>.

A budget is allocated specifically for the Ahwar, but the exact amount is not transparent. In its State of Conservation Report, the government notes that rehabilitation projects of the Ahwar depend on the Iraqi budget: “such projects shall be implemented if they receive the sums needed from the operational budget of the Republic of Iraq”,²⁸ remaining clear of any concrete budget allocation at all for the World Heritage site. At the same time, consider that authorities have not been able yet to complete a simple task as creating a site-specific logo, requested by UNESCO, due to “lack of financial resources”. This confirms that financial support for the Ahwar is insecure.²⁹ The Iraqi government remains highly dependent upon foreign donors to rehabilitate the Ahwar.

Recommendations

The World Heritage site of the Ahwar needs greater involvement of civil society and indigenous communities in order to propose concrete solutions for its preservation. Several issues need further scrutiny from UNESCO, such as containment of oil exploration, overhunting and -fishing. This is why UNESCO must meet with civil society and indigenous communities during field missions and support the formation of an Iraqi civil society coalition that includes all stakeholders. Iraqi authorities in their turn should appoint a liaison officer for civil society. This will require greater transparency from the authorities, as they must give public access to all relevant information and communication with UNESCO. Skills of indigenous communities need to be developed through training, for them to advocate directly with the relevant bodies. To ensure the water flows for the natural heritage of the marshlands, transboundary water-sharing agreements between Iraq and neighbouring countries are necessary. UNESCO can play a mediating role on the international level. Together with all Iraqi stakeholders UNESCO can push for a long-awaited, long-term sustainable vision for the Ahwar of Iraq.

“Our Marshes”, First Civil Society Coalition to Protect the Iraqi Marshes

Iraqi Civil Society Solidarity Initiative

The unknown fate that has prevailed the future of the Iraqi marshlands since its inclusion in the UNESCO World Heritage List has worried civil society. CSOs, activists and academics concerned about the preservation of the Ahwar met in a dialogue session organized by Humat Dijlah Association and the Iraqi Social Forum, in cooperation with the Development Center for Energy and Water, on Saturday 18 March 2017 in Baghdad. Under the title “Uniting the voice of civil society and its perceptions on the management of the Iraqi marshlands”, the session included five hours of detailed discussions on the management mechanisms of the marshlands, the reasons for delays in the implementation of UNESCO recommendations, the absence of clear plans and policies, and the lack of involvement of civil society as a key partner in the management of this file. The most important demands from this meeting can be summarized as follows:

- A comprehensive performance assessment of the authorities concerned for following up the implementation of the UNESCO recommendations after the inclusion of the Ahwar in the World Heritage List, and the identification of the causes of delay that led to Iraq’s failure to implement the initial requirements within the Marshlands file.
- The urgent and immediate formation of an independent unified committee, under the direct supervision of the Presidency of the Council of Ministers, to start the implementation of the UNESCO recommendations, and management of the Marshland file to ensure its preservation within the World Heritage List.
- To work according to the requirements of the World Heritage Committee in involving local communities and civil society organizations as a key partners in managing the Ahwar and ensuring real and effective representation of representatives from civil society in any committee responsible for this issue.
- Develop a comprehensive management plan that takes into account the international conditions of the Historical Sites and marshes listed in World Heritage List, and takes into account Iraq’s time limits for the fulfillment of these conditions, including phased timetables to be committed to avoid further delay.
- Supporting and encouraging natural and cultural tourism in the Marshes and archaeological cities, by assessing the tourism situation of these areas and starting the establishment of the infrastructure that qualify them to be a tourist destinations that benefits their local inhabitants.
- Develop policies to ensure food security and sustainable development of the marshlands population.
- Ensure the provision of equitable water proportions to maintain the required levels in order to sustain the natural,

²⁸ whc.unesco.org/document/164963.

²⁹ whc.unesco.org/document/164963.

environmental and economic life of the marshes by negotiating with the upstream countries of the Tigris and Euphrates Rivers and their tributaries to secure access to Iraq's water rights in accordance with international norms.

- Negotiate with the local governments of the marshlands governorates, in order to reach a common conviction that the marshes on the World Heritage List should be independent within a unified management of all the marshes of different geographical location and administrative divisions.
- Develop a vision to market the products of the local population of the marshes, to be a tourist, economic as well as an investment attraction.
- Secure the water future of Iraq, and invest every drop of its water imports before going to the downstream, as well as securing the future of the marshes to store water in nearby tanks to maintain equal levels of water in the marshes.
- Establish a joint research team to support scientific researches, to find the best ways to treat pollution and maintain and preserve normal life in marshlands.
- Enacting strict laws and taking firm measures to reduce the phenomenon of overfishing, encroachment on natural resources and environmental damage, while providing economic alternatives to the local population within the Marshlands Restoration Plan.
- Encourage Iraqi universities with scientific and social specialties to guide graduate students to provide more studies that constitute academic sources for the development of the reality of the marshes.
- Facilitating investment procedures and open doors to investors to work on the implementation of service, economic and tourism projects in the marshes, and enable the private sector and give it the opportunity to be an active partner in the process of revitalizing the marshlands.
- Accelerate the legislation of the Marshlands Law.
- Activate the role of the National Reserve and to initiate the establishment of other nature reserves.
- Facilitate visa procedures for foreign expatriates wishing to visit and offer international solidarity with the marshlands issue, as well as facilitating the procedures for obtaining security approvals to enter the provinces where the marshes are located within their borders. This process plays a key role in promoting the Iraqi marshlands as a tourist destination locally and internationally.
- Take a serious and firm stance in rejecting the continued construction of the Turkish Ilisu Dam without providing any respect to Iraq's water rights and without reference to the international conventions of the riparian countries.



The session concluded to the formation of an Iraqi gathering of civil society organizations, activists and academics interested in the issue of the marshes, under the title of "Our Marshlands" as the first alliance of Iraqi civilian parties interested in the issue of the marshes, to work

on the provision of protection, development and integrated management. Those who joined the gathering are: The Iraqi Social Forum, The Development Center for Energy and Water, Humat Dijlah Association, The Association for Human and Environmental Protection, The Iraqi Green Climate Organization, The Iraqi Civil Society Solidarity Initiative, Save the Tigris and Iraqi Marshes Campaign, Bilweekend Cultural Project, Dr. Jabbar Al-Saadi the Iraq representative of the International Federation of Buffalo, Dr. Ibrahim Sudanee, Dr. Durgham Ali, Dr. Maytham Abdullah, and Mr. Sadiq al-Maliki as activists and academics interested in the environment and marshes issues.

With its high aspirations, Our Marshlands gathering is emerging to represent civil society and its legitimate demands in a unified voice to ensure a better future for the Iraqi marshes, while not compromising its inclusion in the World Heritage List. The gathering also stands ready to welcome all organizations and activists who wish to join its charter.

Response to Disaster: The Case of the Sukur Cultural Landscape of Northeastern Nigeria

Musa O. Hambolu, University of Jos



Fig. 1: One of the burnt huts undergoing reconstruction. Photo © NCMM Nigeria

Sukur Cultural Landscape, an ancient hilltop settlement on the Mandara Mountains on the border of Nigeria and Cameroun was declared a World Heritage Site in 1999 under UNESCO cultural criteria (iii), (v) and (vi). On December 12th 2014 the self-proclaimed Islamic insurgents in Nigeria (Boko Haram) attacked the site, killing people, burning houses and stealing live stocks and other goods. Now, forty months after the attack, neither the World Heritage Committee nor the State Party has been able to mitigate the damages wrought on the site. If the delay in the response of The World Heritage Committee is understandable in the context of its protocols, the slow response of the State Party is not excusable. The response to the disaster that befell Sukur Cultural Landscape also brings to question the role of a plethora of stakeholders.

Introduction

The attack on Sukur Cultural Landscape in 2014 by Islamic Boko Haram (Hambolu 2016 and 2017) produced some consequences on the people and the landscape. It did not take too long for the Sukur people to return home to meet the devastations wrecked on their private homes and World Heritage Properties at both the uphill and plain dwellings. Left to their own resources, each effected repairs to his or her dwellings and resumed the pursuit of their livelihoods. The properties that belong to all have been left unattended to this date.

The lack of support from the State Party may be understood, but not excused, in the context of widespread devastations of settlements and concomitant dislocation of people. Thus far, government and NGOs have concentrated their efforts on taking care of internally displaced people. While the Nigerian Government claims that the insurgents have been defeated technically, they still wreck havoc intermittently thereby still tying down manpower and resources. The restoration of the areas destroyed at Sukur has not commanded priority in the eyes of the Nigerian Government.

The National Commission for Museums and Monuments, the agency charged with the responsibility of overseeing Nigeria's World Heritage Sites, has been handicapped by financial constraints. In happier times the commission would have been able to carry out the required repairs.

Action taken so far

On the 4th of May 2016, UNESCO Nigeria sent a mission to Sukur. At the meeting presided over by the Hidi in Council, Item 3 on the agenda dealt with security of the site. It was emphasized that the traditional security were able to withstand the Boko Haram infiltration till they were overpowered in December 2014. It is perhaps mollifying to note as contained in the report that "the cultural components that were used to enlist the site in 1999 are still actively present among the community as part of their living culture". The cultural features by which Sukur merited a world heritage status are principally, vernacular architectures, paved walkways, domesticated landscape, terraced farmlands, traditional granaries, shrines and ceramic altars and iron smelting furnaces. Only the vernacular architecture (the Palace) and World Heritage complementary buildings like interpretation centre, museum and clinic were destroyed. As attested by recent visits, the core of Sukur cultural manifestations remain intact.

To be noted as one of the major outcomes of the meeting is the understanding that funding will be required from either the State Party or the World Heritage Committee to restore all the burnt structures uphill as the community will not be capable of financing the restoration work. As I write now, nothing has been done along that line.



Fig. 2: The paved walkway to the hill settlement. Photo

© NCMM Nigeria

So far, the Commission has been able to prepare a Management Plan for 2017-22 that incorporates lessons learnt from the attack. The plan must incorporate emergency response and disaster mitigation. The leadership of the National Commission for Museums and Monuments has also prepared a budget for repairs and other actions required to bring back life to the site. There is however no concrete reasons to believe, with certainty, that there will be cash backing for the budget in the nearest future.

Observations and Recommendations

Though the attack by Boko Haram wrecked major damages, we should be mindful of many other risks and challenges to the preservation of the site. These include among others, the problem of erosion, poaching, pests, desertification etc. These must be addressed urgently, for it to continue to be attractive to the residents; the site must continue to be able to sustain the livelihood of its inhabitants.

Pre-, during and post-disaster action plans must be well articulated, and their efficacy and practicality should be constantly put to test and verified. Disaster mitigation as the name implies, cannot solve all problems, but at least enables the occu-



Fig. 3: The paved way entrance to the hill community was not destroyed.

Photo © NCMM Nigeria

pants and site managers to prevent some problems, and when they inevitably occur the problems can be addressed promptly and effectively. It is hoped that the disaster preparedness training planned, will go a long way in addressing this type of challenges.

Can we have a plan to stop or pre-empt disastrous consequences of insurgency? A two-pronged approach is hereby advocated. We need to put in place a trained local vigilante specifically for the site. The local community has been fending for their vigilante but substantial help from the State Party would go a long way in establishing a sustainable structure of internal security. We also advocate that all efforts towards peace building should be supported. It is in this light that we call for support of the Cross Border Peace Park advocated for the region.

We should seize the opportunity of reconstruction to address the issue raised by Nicolas David on the genuineness of claims of



Fig. 4: One of the burnt buildings downhill.

Photo © NCMM Nigeria



Fig. 5: A group of huts in the hilltop village reconstructed after being put on fire by Boko Haram.

Photo: Musa O. Hambolu

bottom-up participation of the upland Sukur community. Had bottom-up participation been in effective operation, the reconstruction of the destroyed buildings would have been effected. I wish to share in David's optimism and along with him hope that in spite of the Boko Haram problem "participatory integration of Sukur men and women would be harnessed into the effective conservation and management of their cultural landscape". Alienation of the less educated should be redressed.

Commitment to the implementation of management plans should be demanded. In the tricky business of maintaining a balance between demands to develop the community and to maintain the authenticity and integrity of the site, preference should tilt towards protecting the integrity and authenticity.

The State Party should be held accountable for further preservation of the cultural values and provide adequate protection for the site. Despite our respect for the procedures of the World Heritage Committee, it is recommended that a more rapid response mechanism would need to be developed in dealing with disasters like that which occurred at the Sukur Cultural Landscape.

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Management of the Cultural Landscape of Bali Province in Fits-and-Starts

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The *subak* is a traditional irrigation water management system that governs agricultural and associated cultural practices in Bali. The system was acknowledged as a UNESCO World Heritage Site in 2012 as the manifestation of the Balinese ancient philosophy of *Tri Hita Karana*, or the three foundations of prosperity and happiness. The integrity of the *subak* system however, is threatened by changing development priorities in Bali. The rapid rate of land conversion due to a growing tourism industry and expanding settlement areas has resulted in the conversion of almost 1,000 hectares of rice fields annually in recent years.

Fig. 1: Schematic view of a *subak* territorial unit including a village, mountain forests and lake, rice terraces and fields, irrigation system, and water-related temples. Graphic: <https://i.pinimg.com/originals/dc/01/b7/dc01b7f506dee695ca35db68f5e336fd.jpg>



During its inscription, the World Heritage Committee (WHC-12/36.COM/19) had foreseen these development concerns, and recommended identifying the interconnectivity of the *subak* system, with a special focus on protecting water sources. The Committee also highlighted the importance of setting buffer zones to help protect watersheds that irrigate the *subak*. Water quantity and quality concerns, such as ensuring adequate water flow, and unregulated use of agricultural chemicals were also identified as significant issues.

One approach to identifying watershed and buffer zone features of the *subak* landscape led to the initiation of a mapping process. By spatially identifying key areas, and following up

findings through targeted studies, stakeholders would be able to address broader management concerns and mitigate specific threats to the integrity of the site. The Ministry of Education and Culture therefore supported studies to map various zones, especially water resources, and further conducted collaboration initiatives to facilitate adequate regulations to improve overall site management. Such efforts intended to support the creation of a National Strategic Area, which could help streamline coordination across the complex and varied stakeholders involved in the protection and management of the site.

The site clusters are spread over five regencies, making coordination especially challenging across the numerous government agencies and other stakeholders involved in site management. Coordination must further take place between the *subak* institutions within the site, and furthermore, the numerous villages, temples, NGOs and private sector that also play an important role. The goal of the National Strategic Area would include a presidential decree that would assign specific responsibility over the management of the geographic area, further identifying buffer zones, and strengthening overall protection measures of the site.

Mapping the Subak and Watershed

A more intensive effort to map the watersheds of the site began in 2015. The Ministry of Education and Culture coordinated the effort, which was implemented by *Bukapeta*, an Indonesian organization specializing on thematic mapping. The first part of the mapping involved capturing aerial drone photography, which helped to stitch together the landscape maps. The intent of this mapping process was to take particular attention of the upstream and downstream connectivity of the watershed. Workshops were conducted with the *subak* institutions (which are led by *pekaseh*, or heads of *subaks*), to discuss important features of the landscape and raise broader awareness. *Pekaseh* were trained to read maps and develop participatory sketch maps. Drone images were printed and *pekaseh* were provided layers to include key components of the map. These participatory maps included temples, villages, and boundaries. With the help of local students, *pekaseh* also collected GPS points in the field to improve mapping accuracy.



Fig. 2: Forum Pekaseh Catur Angga Batukau creating participatory sketch maps as part of the mapping pilot project
Photo: W. Dharmiasih / Yu. Arbi

The results of these maps were then placed at each cluster of the World Heritage Site. The map display provides information to visitors and highlights the interconnectivity of water through the cluster site. The maps were also intended to act as a potential tool for monitoring and evaluating regarding the rapid land conversion threatening the integrity of the site. In other words, the maps provide an account of the location of rice fields, water sources, water distribution areas, forests, villages, buffer zones, and more. In the event of these functions change over time, there is a record to show what changes have taken place.

What's Next for Site Management?

Managing a living cultural heritage site is complex because they are dynamic sites and continue to change. People interact with these landscapes as a manifestation of culture and to fulfill their livelihoods. The proposal for an adaptive co-management approach to the site has sought to introduce new management mechanisms to increase, as the Dossier (V-15) says, “the ability to observe and interpret social and ecosystem dynamics and develop the social capacity to respond to feedback and change”. Since 2015, mapping efforts have sought to identify key elements of the landscape and furthermore, to build support among key stakeholders. In the mapping process, direct involvement of the *pekaseh* and working to imagine the landscape as an interconnected landscape has also helped to initiate efforts to strengthen the role of the *subak* institutions as managers of the site.

However, more concrete and binding commitments are still necessary to build the requisite coordination across various stakeholders. At this time, divergent and conflicting interests continue to present new challenges that undermine the integrity of *subak* institutions. In particular, the *subak* institutions are further being exploited by the expansion of the tourism indus-

try, broader development pressures, and decreased authority in managing the site. The proposed National Strategic Area could help to reorient and reposition the role of the *subak* as land and water managers. This, however, would require a renewed commitment towards convening stakeholders, instituting management plans that are based on the foundational mapping work that has been initiated, and reconsidering regulatory aspects that support local authority in site management.

In the 41st Session of the World Heritage Committee in Krakow

(2017), the Committee inquired about the progress of management efforts. The Committee requested “specific responses to ensure that the property is designated as a National Strategic Area, with special provisions that can deliver natural resource management within the protected zones and buffer zones of water catchment and cultural properties”. The Committee also inquired about progress towards the Government of Indonesia’s commitments to securing a presidential decree towards these ends.

As of the time of writing, it is unclear to what extent these commitments will be fulfilled when the Government of Indonesia is requested to submit the State of Conservation Report by the end of 2018.

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V. Historic Cities

The Destruction by Metro of Quito of the Patrimony, Tangible and Intangible, of Quito's Historic Center

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The "Square of San Francisco", the Amaru Kancha and the Temple of Illapu in Millennial Kitu

The area that we know today as Quito's Historic Center constituted the pre-Columbian ceremonial center of the ancestral habitat of societies and cultures seated longitudinally in *bulus* or residential clusters, at the foot of the volcano *Apu Pichinchay*¹. These lie upon "the high plain of Quito" (*Aña Kitu*), which includes an ancient lake bed for agriculture and aquaculture constructed according to the native system of mounds and irrigation. The present city of Quito, capital of the Ecuadorians, existed as a residential and ceremonial complex since at least 4,000 years ago. The "Historic Center" of Quito, physically and symbolically, is the hill *Panecillo*; this being the dividing node but at the same time the center or integrating point of what we know as the north and south districts of Quito.

At the beginning of the European colonization, the religious ceremonial center *Hanan Kitu* or *Aña Kitu* was partially superseded by Incan walls and platforms built upon the ancient religious mounds of the *Kitwa Kara*. These were at once supplanted by the Catholic Church and the European colonists, giving place to a valuable and very singular architectural symbiosis - urban and multicultural. Despite not having been studied with sufficient rigor, the Outstanding Universal Value of this symbiosis permitted the designation of the so-called "Historic Center" as a World Heritage site in 1978, citing the value "indigenous, baroque, and colonial of its edifices."

The area of the square and colonial church *San Francisco* is part of a whole with the other churches, convents, schools and colonial edifices—along with republican constructions over other sites—and with pre-Columbian footprints that have appeared to the South, such as the Church of Santa Clara and to the north the building of the school *La Providencia*. In this intangible sector, not only was there the single religious site of San Francisco but what had been previously the temple of *Illapu*² (thunder). This temple was then built over by an Inca palace

of the type *kallanca* from Cuzco and "a *tianguéz* or *katuk*"³: a place of interchange or indigenous market. Originally, it was part of a true *kancha* or "ceremonial plaza" of the pre-Incan Kitu cultures. This comprised a complex of diverse buildings that extended toward the volcano Pichincha and encompassed to the southwest of the great ceremonial center of pre-Columbian Quito whose limits today are difficult to divine: the temples that now correspond to the churches of San Francisco, *Santo Domingo*, *San Augustin*, and *La Merced*. The four sites form the geometrical square today considered as constituting the World Heritage site⁴.

The "Historic Center" has a unique cultural and topographical ecology being crisscrossed by natural *waykus* (or ravines), tunnels and canals created by runoff from Pichincha. After the passage of five centuries, human drainage systems of various forms, tunnels between ravines, a variety of landfills, diversions and pressure-releases have formed the "urban image" of Quito as relatively flat, apparently Colonial and Republican, that we observe today, not seeing the subterranean depths of a real but intangible multicultural palimpsest. This is a place where public and private use has conserved in a cultural continuum.

Metro of Quito Destroys Archeological Vestiges

On October 16, 2015, "Metro de Quito", the company in charge of building the local subway, published an archaeological study that established the presence of several "anomalies" identified by geo radars: 21 "anomalies" were located in the San Francisco Plaza and 15 "anomalies" on Cuenca Street (Delgado and Vásquez, 2015: 28) (fig. 1). Subsequently, on April 28, the National Institute of Cultural Heritage (INPC) authorized excavation works in the area where the anomalies were found. In anomalies 1 and 2 were found three chambers built in the volcanic tuff or "*cangahua*"⁵ (figs. 2 through 13). This archaeological work was carried out by the Metro of Quito and its re-

1 Apu Pichinchay would be a closer approximation to the native designation for the volcano Pichincha; the word apu in the kichwa language refers to a living and sacred entity.

2 Illapu means thunder in Kichwa. We know from research that there was a temple dedicated to thunder in the Square of San Francisco (Burgos Guevara, 1995).

3 Katuk means market in Kichwa (the same for tianguéz in the Nahuatl, a native language from Mexico that is often used in Quito by ignorance of the Kichwa term).

4 Peñaherrera Mateus FAU-UCE 2012, Burgos Guevara 1995

5 Cangahua: kichwa word that designates the volcanic tuff or hardpan that underlies the city due to continuous volcanic eruptions.



Fig. 1: Anomalies in San Francisco Square.

Map: Delgado y Vásquez 2015:30

ports were published on October 27, 2016 among a great political and social controversy.

In September 2016, our citizens group *Kitu Milenario* received a complaint from a citizen who happened to be at Metro de Quito's presentation of the subway project's status to the World Bank Commission that was visiting the city for this purpose. Subsequently, a presentation was made by an engineer, a Metro de Quito employee, that showed the archaeological vestiges found under San Francisco Plaza. The World Bank Commission was informed on the decision taken by Metro de Quito to continue building the subway station on the site and to destroy the archaeological heritage they had found after opening the station's pit, as they considered it "archaeological garbage" (Pérez, 2017: min. 5:56).

On the 18th of September 2016, members of *Kitu Milenario* managed to enter in the site disguised as workers and officials. They took pictures and videos of *cangahua* structures and of brick walls. Based on the testimony from several elderly inhabitants of Quito the presence of one of many subterranean tunnels and galleries was confirmed. These discoveries were funerary chambers of our past cultures: *Kitu Kara* and *Inca*. We published this material that same day on Facebook and YouTube, provoking thousands of reactions and comments, from citizens who had not previously been informed about the finds. Days later, on September the 30th, 2016, seven citizens filed a protective action to prevent the destruction of the archaeological findings, to ask for a change to the path of Line 1 of the Metro, and to solicit international support precautionary measures. It was evident that the ground was full of water and littered with garbage (fig. 14 through 17).

The legal action was denied by Judge Patricio Baño on October 3, 2016, claiming a legal incoherence between patrimonial rights and the acts of violation that the complainants presented

before the judge (UJP, 2016: 26). However, he ruled that the found vestiges must be "valued by the site" as recommended by the INPC entity responsible for the archaeological technical analysis in the protection action, which had certified that the structures were treated in an inappropriate manner. On November the 18th of 2016, the INPC issued a report called "Diagnosis of the State of Conservation of the Structures of the San Francisco Square" delivered to the "Commission of Historical Areas and Heritage" of the Municipality of Quito, where it was confirmed that the structures in *cangahua* did not receive adequate management during and after the excavations:

"*Cangahua* structures are altered mainly by runoff and the impounding of rainwater inside them, caused by the lack of preventive conservation measures during and after the excavation." (INPC, 2016a:6)

Even though *Kitu Milenario* lost the legal battle, surveillance was carried out during the following months to determine whether the Metro of Quito would comply with the INPC's suggestion of "enhancing the value of the place" (fig. 18) (INPC, 2016b: 15). In July and August of 2017, Lenin Oviedo, a communications student whose thesis topic was the treatment of San Francisco's findings, and one of the authors of this paper, recorded the destruction of the *cangahua* structures by heavy machinery (figs. 19 through 29).

Finally, on September 19, 2017, several citizen groups guided council members of the Commission of Historic Areas and Heritage through the site to verify the destruction of the *cangahua* structures (figs. 30 and 31), and that the Metro of Quito did not comply with the provisions of the INPC, and that it had committed a crime against our heritage. In this way, Quito, an Andean city of pre-Columbian origin, by actions of the authorities, has lost once again an opportunity to display to the world its millennial and multi-cultural palimpsest.

Incoherent Statements of the Authorities, in a Broad Cultural Archaeological Context

The mayor of Quito, Mauricio Rodas, and the manager of the Metro of Quito, Mauricio Anderson, have declared on several occasions that the *cangahua* structures that were found in the Square of San Francisco correspond to the Republican and later periods do not represent sufficient archaeological interest so as to require halting the construction of the Metro station. In contradiction, the INPC says that dating of the site cannot be established, since radiocarbon (carbon-14) analysis can indicate very archaic formation of the *cangahua* but cannot determine the timeframe of human action upon it. However, dating is based on the historical contexts of archaeological complexes close to the historic center. For example, the Cochasquí pyramids, located 52 km north of Quito, has 15 pyramids and 21 funerary mounds built with blocks of *cangahua* between 500 and 1500 AD.

Today, fifty-percent of the archaeological surface area of the Square of San Francisco has been destroyed, with more destruction likely by the works of the Metro de Quito. As citizens of Quito we know that there are underground structures and a network of tunnels below the entire Historic Center: some inhabitants have walked through subterranean tunnels, Ecuadorian researchers such as the anthropologist Hugo Burgos Guevara had warned of the presence of these structures before the advance of the Metro. Moreover Luis Zhunio, member of the Scientific Council of the “Pueblo Kitu” and political activist for the defense of the Square of San Francisco, explains that beneath San Francisco, at a depth of approximately 20 to 50 meters, there is a pyramid made of *cangahua*. He also notes that the historic center is made up of 13 pyramids located in the subsoil and that form a ritual circle.

A report prepared by the National Institute of Metallurgical Mining Geological Research (INIGMM) indicates that the subsoil where San Francisco is located is constituted of *cangahua*. An investigation of Dominguez and Bravo informs us of “blocks of *cangahua* found in *Panecillo* hill,” the central hill of Quito situated next to the Square of San Francisco (cited in Aguilera, 2011: 38).

Recommendations

First, we urgently recommend prohibiting the entrance of the Metro into the Historic Center while there are no serious studies, using effective technologies, of the entire subterranean area of the historic center. We consider that the site of the station in the Square of San Francisco and the tunnels under Cuenca Street, need a detailed inspection by an external archaeological group specializing in pre-Columbian Andean areas. This external group should be supervised and financed by UNESCO. In the experience of *Kitu Milenario*, national archeologists and na-

tional preservation entities have offered no sincere interest or support; we believe that they prefer to keep silent.

Moreover, in the name of transparency, we ask that existing and future studies be made public in communication medias, so that the citizenry might participate in decisions concerning the preservation of our patrimony. In addition, as our citizens groups are volunteers but their efforts require financial and technical resources, we ask for guidance regarding entities that might support our cause in scientific, legal and financial ways.

Quito is an inaugural site in the World Heritage List because it exemplifies Selection Criteria II and IV, among others. We consider that the destructive works by Metro of Quito affect directly the “interchange of human values, over a span of time... on developments in architecture or technology” and that “which illustrates significant stage(s) in human history.” We plead that Quito be added to the “List of World Heritage in Danger.” This recognition would be a powerful cultural trigger to serious action, unifying Ecuadorian society to properly treasure and manage the World Heritage that is Quito.

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Fig. 2: Steps and arches (Vargas 2016:43)



Fig. 3: Second arch (Vargas 2016:43)



Fig. 4: Third arch (Vargas 2016:43)



Fig. 5: Arch with a stone (Vargas 2016:44)



Fig. 6: East arch (Vargas 2016:44)



Fig. 7: Low wall and semicircular room (Vargas 2016:44)



Fig. 8: Eroded stands (Vargas 2016:45)



Fig. 9: Chamber two (Vargas 2016:46)



Fig. 10: Convex arch (Vargas 2016:47)



Fig. 11: Three chambers (Vargas 2016:48)



Fig. 12: Chamber three, event A (Vargas 2016:49)



Fig. 13: Chamber three, event B (Vargas 2016:50)



Fig. 14: Trash in the chambers (Velasco 2016)



Fig. 15: Trash above the floor of the niches (Velasco 2016)



Fig. 16: Water on the floor of the chambers (Velasco 2016)



Fig. 17: Water reflects the zinc roof (Velasco 2016)



Fig. 18: Proposed museum for the chambers (Vargas 2016:245)



Fig. 19: The structures were covered with dirt (Authors' archive)



Fig. 20: After that, heavy machinery made perforations through cangagua structures for building piles for the station (Authors' archive)



Fig. 21: Perforations through cangagua structures (Authors' archive)



Fig. 22: After the piles were made, machinery continue destroying the cangagua structures (Authors' archive)



Fig. 23: A brick wall destroyed (Authors' archive)



Fig. 24: Two kinds of cangagua under a concrete platform constructed for the station (Authors' archive)



Fig. 25: A brick waterway destroyed (Authors' archive)



Fig. 26: Big flat stones appeared with the destruction, they probably were for an Inca structure (Authors' archive)



Fig. 27: Foreground of the destroyed cangagua, (Authors' archive)



Fig. 28: A stone wall appeared with the destruction, they probably were for an Inca structure (Velasco 2017)



Fig. 29: Machinery removes the stone wall (Velasco 2017)



Fig. 30: Absence of Cangagua structures. Photo: Kitu Milenario



Fig. 31: Absence of Cangagua structures. Photo: Kitu Milenario

Late Baroque Towns of Val di Noto: Natural and Anthropic Risks

Elena Minchenok (Russian National Heritage Preservation Society)
and Alessandro Leonardi



The WHS «Late Baroque Towns of Val di Noto (South-Eastern Sicily)» was inscribed in the World Heritage List in 2002, under criteria (i), (ii), (iv) and (v). The Site comprises nine towns (and related areas) deeply heterogeneous in their dimension and anthropic presence, as well as in their socio-economic relevance. It also is a very complex structure that combines both tangible and intangible heritage in the same context, as well as a combination of more than one actual or potential item of cultural heritage, each having its own specific relevance, within each individual object (for instance, stuccos or paintings into the baroque churches).

As it is widely known, the particularity of the site lies mainly in its non-layered and simultaneous origin: On 9 and 11 January 1693, about three earthquakes occurred with their epicenter located in the ancient Sicilian district of the Valley of Noto, followed by a tsunami, or tidal wave, which arose off the coast of Catania, severely damaging or even destroying (as happened with Catania) more than sixty towns within the relevant area.



Fig. 1: The significant distance from the volcano Etna to the city of Catania evidences no actual threat of eruptive activities to the component of the WHS. Photo: A. Messina

Rebuilding of the entire zone devastated by the catastrophe at the same time, among other factors, gave the community a unique chance to develop a new artistic, architectural and town planning language. The particular style that was created in this area and later defined as Sicilian Baroque accompanied the new form of organic structuring of urban fabric. This was

presented both in purely planning and design terms (like, for instance, the defined proportions of width of the streets and height of the buildings, or introduction of particular anti-seismic measures) as well as in social and economic balances that demanded a ratio between various types of buildings intended for the particular social strata of the time (aristocracy, clergy and bourgeoisie).

Such a complex reality entails the coexistence of many multi-level risk factors which, taken one by one, cannot only have a significant impact on the integrity of the heritage, but faced in all complexity, can also be a serious danger to the integrity of the Site.

Natural factors of risk: undervaluation of seismic risk

Describing the present situation of the Site, the WHC Periodic report of 2014 presents a set of risk factors given in the factors summary table. Surprisingly, some very low or almost non-existent risk factors, on the one hand, are overestimated, and on the other hand, certain serious risks are mistakenly undervalued or not considered at all, and yet they have a decisive importance for the resilience and integrity of the Val di Noto.

The first category refers primarily to the so-called “volcanic eruption” risk included among the sudden ecological or geological events (3.11) and apparently relating to the proximity of the town of Catania to the volcano Etna. However, both the actual geomorphology of Mount Etna (the active craters of which are actually located at almost 3.400 meters above sea level) and environmental characteristics of areas surrounding Catania exclude such a risk, which in extremely rare cases could concern areas or small villages at high altitude, located in any case outside of the Val di Noto Site (such as the exceptional eruption of 1991, which threatened the small mountain town of Zafferana Etnea).

The Annex “R” (“volcanic risk”) to the Emergency Plan of the City of Catania (2012) substantially recognizes that there are no risk factors related to Etna’s eruptions or its lava flows for the urban area.

The negative effects of eruptions and volcanic activity (that can only refer to Catania, being only one of the eight component towns of the Site), could arise on very few occasions from extraordinary emissions of lapilli and volcanic ash (so-called pyroclastic flows) which, transported by the wind, could also settle at considerable distance, causing damage to agricultural activities, dangerous situations in vehicular traffic in inhabited areas, obstruction of the road drainages with possible difficulties in the disposal of rainwater, and disturbances to the eyes and the respiratory system. However, this presents no significant threat to the City's tangible heritage.

Instead of volcanic eruptions, a serious concern is represented by the concrete risk of damages arising from seismic activity, which in case of Sicily is not necessarily related to volcanic activity. A recent study has clearly shown that the Eastern coast of Sicily (where the majority of the Val di Noto components are located) lies in the immediate geographic proximity of a system of mantle-derived serpentinites below the Ionian Sea, which have been detected at magma-poor rifted margins and above subduction zones, where they are usually produced by fluids released from the slab to the mantle wedge (Fig. 1).

Scientists have provided evidence of a new class of serpentinite diapirs within the external subduction system of the Calabrian Arc, derived directly from the lower plate, and in which mantle serpentinites rise through lithospheric faults caused by incipient rifting and the collapse of the accretionary wedge.

Such complex system would also be considered to cause the Mount Etna volcanic processes as well as earthquakes in the whole Ionian area between Calabria and Malta. Although there is no actual evidence of the cause-effect relationship between these processes and the specific 1693 events (evidently due to the Hyblaean-Maltese fault, which is in part located within the coastal zone of Eastern Sicily), it could nevertheless be assumed that the former are in any case linked to the strong earthquakes historically recorded in Sicily and Calabria.

The most recent big earthquake, which seriously affected the area between Syracuse, Ragusa and Catania, occurred on December 13, 1990 (the so-called "Saint Lucia earthquake", from the name of the saint revered on that day, or "Carlentini earthquake" from the name of the most affected place), with an epicenter detected in the sea area a few kilometers off the coast (Fig 2-4 – a large part of the Cathedral of Noto collapsed in 1996 due to the prior earthquake whose consequences had not been adequately assessed).

On the other hand, the Italian National Institute of Geophysics and Vulcanology considers that the complex of geological events that have historically affected this area contributes to putting Eastern Sicily among the areas of the biggest seismic hazard in seismic ratings of the entire territory of Italy.

Oddly, the experts that produced the expertise seem to not have considered these significant risks, since in the section "As-

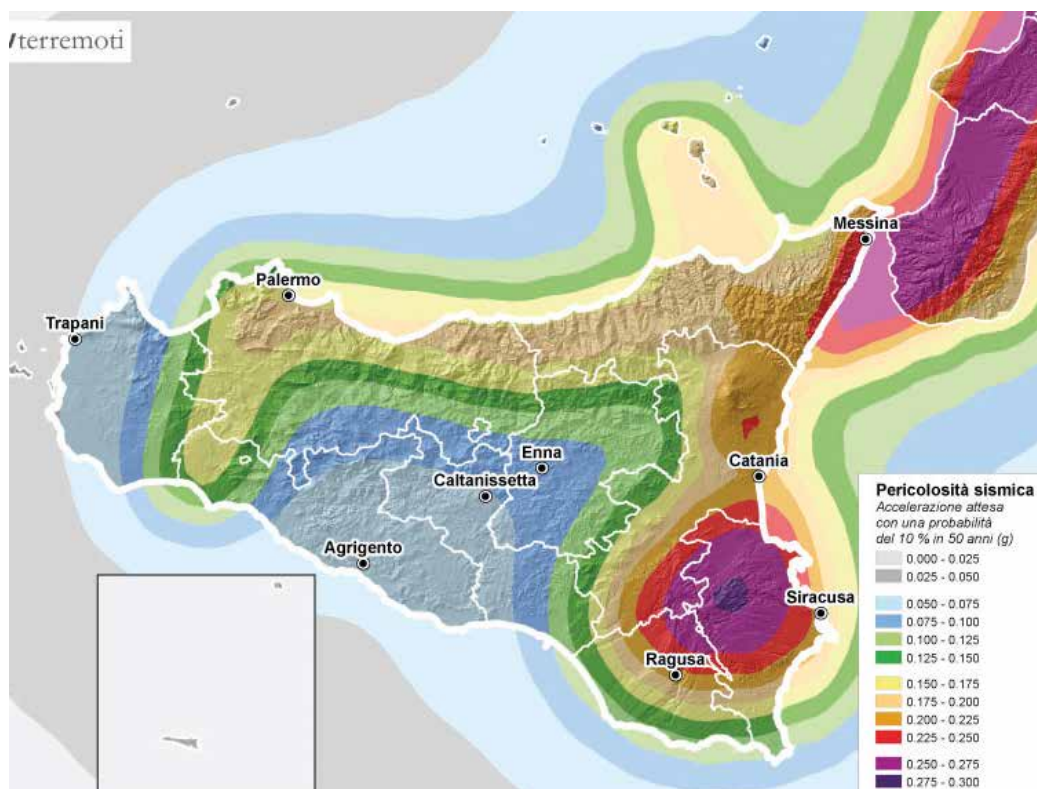


Fig. 2: Seismic risk in Sicily.

Map: INCV Terramoto



Fig. 3 and 4: Right aisle and dome of the Cathedral of Noto after the 1996 collapse.
Photo: M. Castobello / City of Noto

assessment of current negative factors” (which should also include the potential risk factors) of the Periodic Report – Section II-Late Baroque Towns of the Val di Noto (2014), dedicated to the “local condition affecting physical fabric” (point 3.7) the only mentioned data relate to the relative humidity.

For this reason, we believe that the assessment of current negative factors that affect the Site of Val di Noto should be revised, giving due consideration to the earthquake risk (and the related tidal waves phenomenon), and the corresponding World Herit-

age Committee bodies should take all the opportune measures and recommendations aimed to support and implement, both at national and local level, the application of the UN Sendai Framework for Disaster Risk Reduction 2015 – 2030.

On a broader scale, we could also suggest that the World Heritage Committee, according to article 23 of the World Heritage Convention, should reach a higher effectiveness of its policies and should promote and actively support any form of direct trans-local dialogue between cities or local and regional authorities geographically related to the WHSs that share similar critical issues or risk factors, with the aim of implementing exchanges of best practices, establishing common study centers, etc.

Gentrification and disappearing of intangible components of heritage

Another risk that is seriously underestimated is caused by the anthropic factor which operates on a multilayered level. At the first level, one can find a notable fragmentation of the estate properties which, in case of the Val di Noto component towns, are usually divided between public (at national, regional and local level), diocesan (as for some religious buildings), and private owners.

Aside from the specific regimen of real estate as provided by the Italian Law, one can easily note that, although almost all of the most important buildings are of public or diocesan property, there is nevertheless a large number of smaller private properties that surround the monumental buildings, often in direct adjacency to the latter.

The national and Sicilian regional urban laws (with regard to historic town centers) already provide powerful maintenance requirements charged to private owners, as well as effective forms of control entrusted to specific corresponding authorities. Yet, maintenance and restoration works usually require considerable investments that private owners are not always willing (or capable) to undertake. This results in the practice of abandoning these historically valuable properties that become too costly to keep.

The Site has already witnessed several cases of such depopulation of historic centers (this mainly refers to Catania, Noto and Ragusa), a process that was quickly followed by both actual architectural and technical decay and socio-economic urban degradation.

It should also be taken into account that a typical private historical building characteristic of those areas usually holds one or more small businesses in its ground level (the so-called “bottega terrana”), where originally individual artisans of the ancient traditional Sicilian crafts used to work.

The active depopulation of the Site components has by today been partially overcome. Nevertheless, the owners (or users) of both buildings and their business ground level premises have over the years been replacing the traditional businesses by a new set of actors of the urban scenario – a process of “gentrification”. This, on the one hand, is related to seasonal migratory flows of new property owners staying elsewhere the rest of the year, and on the other hand, to inorganic allocation of night-life oriented recreational and/or tourist business activities (restaurants, hotels, etc.- Fig. 4).

Although this evolution has certainly allowed the deep revitalization of historical centers of towns, it must however be considered that the overall historical and cultural context has been seriously altered, up to the point of losing its essential characteristics.

Thus, for example, it becomes particularly difficult to justify the cultural congruity of a kebab shop or a betting center in the same shop that decades ago housed a local master engraver, located in the immediate adjacency of a baroque church.

These processes lead to further negative effects such as disappearance of the few remaining artisans belonging to old Sicilian schools, particularly taking into account that their skills are still assumed as essential and urgent for the restorations of the historic monuments or elements of these that make up the components of the Site. In the end, these skills that are now being lost due to the gentrification processes are the direct heritage, passing in oral tradition, of the ancient knowledge and abilities that made possible the reconstruction of the Val di Noto towns at the end of the XVII-th century, as well as the related social, cultural and economic environments.

Although such processes are for sure set by market rules, it is clear that the correct safeguarding of the urban tangible heritage cannot be separated from adequate safeguarding and promotion of the intangible factors.

To achieve an adequate balance between market forces and the goals of preservation of the WHS, there is a need to:

1. urge the competent authorities to submit an application for nominating the traditional craftsmanship of the Val di Noto area as Intangible Cultural Heritage of Humanity;
2. promote and activate the Sustainable Tourism Program with the competent Authorities (<http://whc.unesco.org/en/tourism/>);
3. formulate appropriate recommendations to the competent tax authorities or tax incentives aimed at supporting businesses and individuals engaged in recognized traditional crafts.

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Liverpool, Maritime Mercantile City

Gerry Proctor, Engage Liverpool



Fig. 1: Map of the inscribed property and its buffer zone.

Map source: <http://www.skyscrapercity.com>

Engage Liverpool, a civil society actor and not-for-profit social enterprise, got involved last year for the first time with the World Heritage Watch Forum held in Krakow, Poland. Liverpool had been on the at-risk register since the St Petersburg, 36th Session of the World Heritage Committee (WHC) in 2012¹ and in 2016 UNESCO WHC took drastic action, rejected by the Mayor,² which called for a two-year moratorium on all planning applications in the site. Then in 2017 the city was given until 2018 to show that it really cared about WHS status or it would be deleted at the 42nd Session of the WHC in Bahrain.³

The city's public authorities had been ambivalent to say the least and it was clear that the elected Mayor and some developers⁴ wouldn't be upset to see Liverpool lose its World Heritage Site (WHS) status. It was obvious that unless civil society took an interest we were in serious danger of losing the inscription. Engage, which works with residents who live in the city centre and waterfront, decided that we would spearhead a

1 <https://www.theguardian.com/uk/the-northerner/2012/jun/20/liverpool-unesco-heritage-risk>

2 <https://www.theguardian.com/uk-news/2016/jul/17/liverpool-waterfront-world-heritage-site-status-risk-mayor-rejects-unesco-plea>

3 <https://whc.unesco.org/en/sessions/42com/>

4 <https://www.theguardian.com/uk-news/2017/jul/01/final-warning-liverpools-unesco-status-at-risk-over-docks-scheme>

Fig. 2: Computer animation of the Liverpool Waters Project which in its current format threatens to destroy large parts of Liverpool's inscribed property and its status as a World Heritage site.

Photo source:
<http://www.attractionsmanagement.com>





Fig. 3: The area of the development plan covers large parts of the inscribed property, and completely alter the historic waterfront. Photo: Engage Liverpool

campaign of education to let people know what being a UNESCO WHS involved, and to ask the question: Was WHS a status worth fighting for? The outcome was certainly not a foregone conclusion.

We had decided that the topic for our 2017 annual seminar series would be the UNESCO WHS, and it was recognised that the local and national media had only ever reflected one side of the story and that citizens had never heard UNESCO's voice, only anti-UNESCO comments mediated by leading players in the city. So after taking advice we invited three UNESCO speakers to come to the city and share their thoughts with us.

All three accepted our invitation which was incredible and so we set about inviting citizens to hear UNESCO's concerns about Liverpool. Each seminar was at capacity with over 150 people attending and the interest was intense. Every event was live-streamed and yet the local press made no mention at all of the city's illustrious guests. Engage managed to place the three seminars in prestigious buildings in the WHS. The first seminar was held in the 18th century Grade I listed Town Hall, the centre of civic life in Liverpool, and the theme was 'UNESCO WHS - What's It All About?' Isabelle Anatole-Gabriel, Chief of the Europe and North America Unit at the World Heritage Centre in Paris, was the main speaker.⁵

The second seminar a fortnight later was held in a different part of the WHS on the Waterfront, the location for much of the controversy with UNESCO, in the newly-built Museum of Liverpool, in perhaps the most sensitive part of the site. The theme was 'Development and Conservation – Why the Conflict?' and the speaker was Prof Michael Turner, UNESCO Chair in Urban Design and Conservation at the Bezalel Academy of Arts and Design in Jerusalem.⁶

The final seminar was in the Grade I Listed Civil Court at St George's Hall in the heart of Liverpool's Culture Quarter, and heard Dr Minja Yang, formerly Deputy Director and Coordinator of UNESCO World Heritage Cities programme and currently President and Professor at the Raymond Lemaire International Centre for Conservation at the Catholic University of Louvain, Belgium, address the capacity audience on the theme 'Heritage Assets - Where's the Value?'⁷ Following her address the participants were asked to vote on the original seminar question and the verdict was unanimous – yes WHS is indeed a status worth fighting for. Not one single vote against.

The impact of our seminars is hard to quantify but two days before Dr Isabelle Anatole-Gabriel arrived in the city the elected Mayor announced he was establishing a Liverpool World Heritage Board which was asked to 'reset the relationship with UNESCO'.⁸ This has now reported and though their report hasn't been released by looking at the draft Desired State of Conservation Report, that the Council agreed and which is now in the hands of the State Party (Department for Digital, Culture, Media and Sport), one can see a huge effort has been made to make sure Liverpool doesn't lose its status this year in Bahrain.

Civil society actors can do very little in the face of strong political power and overwhelming financial resources but we continued to believe in soft power and the impact of simply listening to a voice that spoke of peace, humanity and outstanding universal values. Many of our citizens were deeply moved to hear Dr Anatole-Gabriel say that: "My presence here is to tell you that we, at UNESCO, care for Liverpool. We want to keep Liverpool on the World Heritage List" and she went on to state clearly that the Liverpool Maritime Mercantile City WHS "is a jewel because it embodies one part of the history of humanity itself." Our speakers themselves reset the relationship between the city and UNESCO.

The DSOCR has recommended major improvements to protect the OUV of the site which though it has taken time to get here is a welcome change of attitude on the part of the civic authorities. It is a very honest and clear document and it is to be hoped that it will be accepted by the WHC when it meets this year.⁹ The new elements are:

- A comprehensive updated **Management Plan**¹⁰ was adopted in 2017 that integrates the attributes of the World Heritage property to guide Citywide policies and actions

⁵ <https://www.engageliverpool.com/news/videos-unesco-whs-seminar-one/>

⁶ <https://www.engageliverpool.com/news/unesco-whs-seminar-two-videos-plus/>

⁷ <https://www.engageliverpool.com/news/unesco-whs-seminar-three-videos-plus/>

⁸ <https://www.theguardian.com/uk-news/2017/oct/03/liverpool-world-heritage-site-threat-taskforce>

⁹ <https://www.engageliverpool.com/news/plan-save-whs-status-published/>

¹⁰ <http://regeneratingliverpool.com/wp-content/uploads/2017/07/PMD-486-Liverpool-WHS-Management-Plan-FINAL-VERSION-as-at-12-May-2017.pdf>

- Update of planning tool in force, by the definition and adoption of policy and regulatory measures embodied in a **Local Plan**
- Update of planning tool in force, following the adoption of the Local Plan before the end of 2018, through the revision of the **Supplementary Planning Document** that adopts the Historic Urban Landscape approach
- Review the development in progress for the **Princes Dock Neighbourhood** and, by negotiation with all parties concerned, to continue the pattern of substantially lowering the height of schemes
- Develop and finalize a **height ("skyline") policy for tall buildings** within the Property and its Buffer Zone
- the **Neighbourhood Masterplans for Central Docks** and for Northern Docks and their respective surroundings will be reviewed and finalized
- **Implement the new complementary framework** within the WHS Buffer Zone of the "Ten Streets" Spatial Regeneration Framework
- Strengthen the management system for the Property, and the consistency of approach in managing the development process, through an integrated multi-stakeholder approach, including consideration of the **creation of a Liverpool World Heritage Trust**, in which Engage Liverpool is specifically mentioned
- Develop and implement a **World Heritage interpretation and communication strategy** aimed at the community of Liverpool, and its visitors, and an awareness-raising programme aimed at developers and building professionals, of the World Heritage Property, its Outstanding Universal Value and conservation and management requirements under the World Heritage Convention
- **Review the Property boundaries and Buffer Zone**, and consider an enhancement of its integrity by **an extension of Liverpool Maritime Mercantile City World Heritage Site** to better reflect her maritime and mercantile pre-eminence as the greatest Western European seaport, from the early eighteenth to the mid -twentieth centuries.

It is to be hoped that this is sufficient progress for Liverpool to be kept as an at-risk property in 2018 but not deleted. It is completely understandable that the WHC will want to see these plans and aspirations implemented and as a local civil society actor we would want to exercise caution in any approach given the history of our unnecessarily ambiguous and confrontational relationship with UNESCO. We need time to prove our sincerity and to demonstrate our capacity for delivering what we are proposing.

It would be really good if the UNESCO WH Committee could encourage specific ways in which civil society could be more active in engaging in actions to support at-risk sites and recognise that there is great value in a multiplicity of agencies working from their own perspective and with their own ethos to protect the status of each WHS. Also it seems critical to us that should a planning application come forth for a new football stadium in the World Heritage Site at Bramley Moore Dock then the State Party has no option but to call in the application and in so doing prove to UNESCO that UK planning regulations are capable of protecting this and the many WHSs across the country. UNESCO will be rightly asking why the UK Government never called in the Liverpool Waters project in the beginning and maybe it is because the official State Party (DCMS) is not the Department of Government responsible for Planning (DCLG) and they don't work together!

Engage has decided to support both the city and UNESCO and make the theme of this year's annual seminar series inspirational WHS cities in Europe. We want to bring to Liverpool stories from other WHS to showcase what they have done to make good use of their status to deliver jobs, regeneration, quality of life for locals and an enhanced visitor experience for tourists.

We are currently inviting two people from each city, one from the WHS management team and the other either an architect or planner in the WHS to share with us how they have used their WHS status to establish a unique identity that sets them apart from other cities in their country and region. We want to know how they have increased income to the city, convinced architects that working with the OUV of the site can enhance and improve the designs of their buildings, how they have involved residents in increasing awareness of the WHS for locals, and how they have worked with politicians and developers to keep them on board? The three 'WHS Cities of Inspiration' we are inviting to participate are Strasbourg, Hamburg and Bordeaux. None are perfect but each has a story to tell that we need to hear, each has developed an approach to their WHS that we can learn from.

The final word must go to the DSOCR document set out by Liverpool City Council: *"We recognize that this is work in progress and we invite the active participation of the World Heritage Centre and ICOMOS in the masterplanning process to assist us in reaching the desired state of conservation that is set out here."*

Historic Centre of Vienna Under Increased Heavy Pressure from a Real-Estate Developer

Herbert Rasinger, Initiative Stadtbildschutz



The World Heritage site „Historic Centre of Vienna (Austria) (C 1033)“ is in danger of being destroyed by a huge real estate project of Wertinvest Company managed by Mr. Michael Tojner, and within the inscribed area of the property. The project includes the erection of two high-rise buildings in the core zone, an area where buildings erected in the second part of the 19th century have an ambient height of twenty-six meters.

Our concerns are in line with the World Heritage Centre (WHC) recommendations noting that:

- the planned **high-rise buildings have a height of 66,3 m and 47,3 m** and would dwarf the buildings in the immediate vicinity as e.g. the concert hall (Konzerthaus) or the Mönich-Larisch Palace, now the embassy of Iraq.
- one of the most important **visual axis, the visual axis from the upper Belvedere**, will be heavily disturbed. This view from the hill of the Belvedere down to the city has been praised for centuries by painters and writers and is part of Vienna's identity and its Outstanding Universal Value.

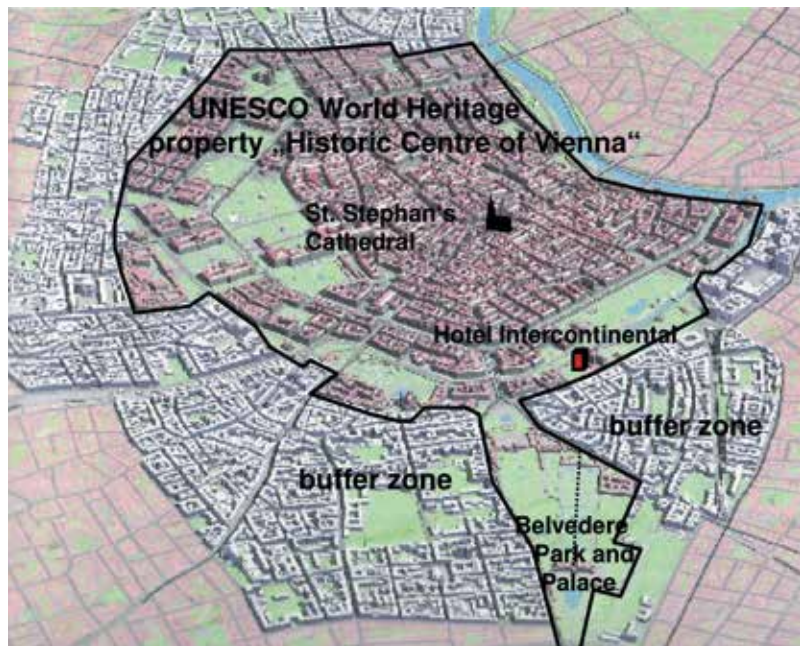


Fig. 2: Map of the Inscribed property and its buffer zone, showing the location of the planned hotel construction. The small dotted line indicates the famous Belvedere view axis. Map: Initiative Stadtbildschutz

Vienna City Council's vote on June 1st, 2017 for two high-rise buildings

The Vienna City Council voted on June 1st, 2017 for this gigantic real estate project with these two high rise buildings within the boundaries of the UNESCO World Heritage designation.

The almost 1ha of land in the core zone was sold in 2008 for the highly favorable price of 4,2 million Euro. The price was low because no construction was to be allowed on the ice skating rink, and the Ice Skating Association had a long term contract valid until 2058.

According to page 15 of the Bund 2013/4 report of the Austrian Court of Audit (ACA), the actual value of this property is approximately 30,35 million Euro under the assumptions that there is no lease agreement with the Ice Skating Association and that construction may be allowed. Mr. Michael Tojner, the manager of Wertinvest Company, which owns this property, is delighted with the sudden increase of the value of the property by the city council vote on June 1st, 2017.

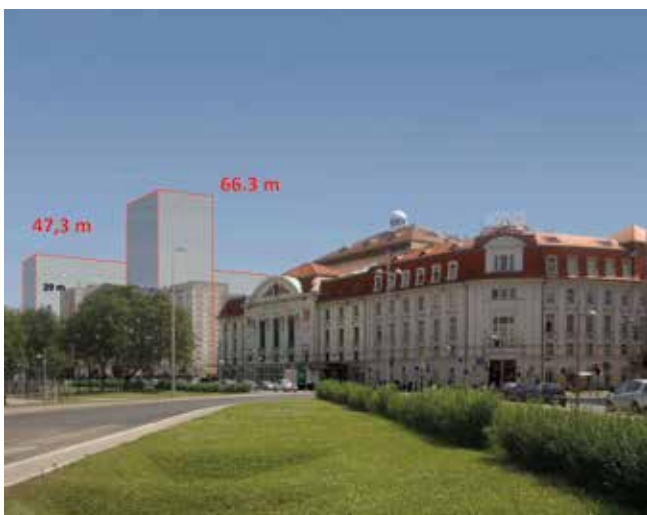


Fig. 1: View from the Schwarzenberg square with the volume of the planned construction indicated. Photo: Initiative Stadtbildschutz

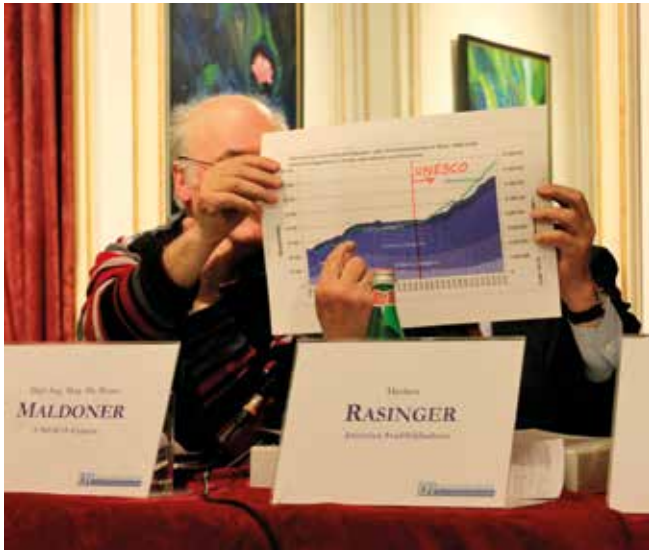


Fig. 3: On a panel discussion, I presented the statistics of the Vienna tourist association: Overnight stays in Vienna have nearly doubled from 7,6 mio. in 2001 (year of Vienna's inscription) to 14,9 mio. in 2016. Photo: Initiative Stadtbildschutz

UNESCO World Heritage Committee decision on July 6th, 2017

The World Heritage Committee convened in Kraków, Poland, opened a discussion on the situation of the World Heritage "Vienna Historical Center". The representative of the City of Vienna was allowed to speak on behalf of the Austrian Government and declared on July 6th in Kraków:

"... the city of Vienna reacted to the previous (2016) Istanbul decision of the committee. The highest political body, the Vienna City Council, decided that in the future the WHOLE area of inscription and buffer zone is an exclusion zone for high-rise buildings. This decision was taken on 1st of June of this year (2017) and is legally binding at the outmost highest legal level ..."



Fig. 4: View of the city park overshadowed by the future high rise buildings. Photo: Initiative Stadtbildschutz

This official declaration of the City of Vienna is misleading, not to say that it is deliberately wrong. It is correct that the Vienna City Council decided on May 5th, 2017 that in the future the WHOLE core and buffer zone is an exclusion zone for high rise buildings. But this decision was valid only for four weeks!

The Vienna City Council decided for the document 7984 of a Land Use and Development Plan on June 1st, 2017 which allows two (2!) new high-rise buildings (one 66,3 meters high the other 47,3 meters high) in the very core zone of the UNESCO World Heritage. This is a violation of the international UNESCO agreement which Austria concluded in 1992.

Management Plan for Vienna's World Heritage

This decision is in complete opposition to the City of Vienna's commitment in its Management Plan for the city's World Heritage sites published in 2016.¹ Areas where no high-rise buildings may be built are defined as exclusion zones and they comprise all the inscribed boundaries of the World Heritage properties in Vienna.

New government in Austria since December 2017

Since December 2017 Austria has a new government and also a new Minister for Culture who seems to care more about culture and UNESCO than his predecessor. The new Minister held a conference on February 1st, 2017 and announced the following steps:

1. Workshop with international experts on March 14th, 2018
2. "Heritage Impact Assessment Report"
3. "Advisory Mission" with UNESCO in autumn 2018.

The workshop on March 14th, 2018 produced no results. The so-called invited experts were not independent at all, with the Minister of Culture even inviting a project manager from the real-estate developer, Mr. Michael Tojner's company.

The above steps have not halted the construction processes of the Heumarkt project since the Land Use and Development Plan, approved on June 1st, remains legally in force. Mr. Tojner of Wertinvest Company has already held talks with the Vienna city government on the detailed approval of the final architectural drawings.

Constitutional Court

The correct procedure is to submit the decision of the Vienna City Council of June 1st, 2017 to the constitutional court of justice which is the only body which can cancel this Vienna City

¹ „Vienna World Heritage - The State of the Art" ISMN 3-902015-97-7 and ISBN 978-3-902015-97-6, page 95.

Council decision of June 1st, 2017. The violation of the international UNESCO agreement is evident.

So far, the government has declared that they want to keep the UNESCO World Heritage status for Vienna, but the government has not taken the right steps to abolish the Vienna City Council decision of June 1st, 2017 which clearly violates the international contract which the Austrian government concluded with UNESCO and which is in force since 1993.

Comment from Gabriele Eschig, General-Secretary of the UNESCO National Commission in Austria

Getting investors on board *before* sorting out the legal aspects and the terms of UNESCO meant getting the whole sequence the wrong way around. “Even architects and engineers criticized this process. This is a handicap for the whole industry, nobody knows what the rules are. Also, this way, not everybody has the same chances.”

Round table with the Minister for Culture

Since public opinion together with environmentalist, architects and city planners voiced strong concerns against this real estate project, the culture minister has decided to listen to the public in a round-table discussion on April 13th, 2018.

Whereas so far losses of the world heritage status were caused by wars or revolutions only, in our case the city of Vienna delib-

erately provokes the Unesco World Heritage Center to get rid of this “straight jacket” of architecture primarily because the city seems to have a desire to please real estate dealers as e.g. Michael Tojner.

The Constitution gives the Austrian government two legal options in order to rectify the heritage situation in the city of Vienna in the controversial projects Heumarkt and Karlsplatz:

The two legal options are:

- intervention in the city planning of Vienna according to article 16 of the constitution and
- appeal to the Constitutional Court in accordance with article 139 of the constitution in order to repeal the Vienna City Council’s decision of June 1st, 2017 in the case of the Heumarkt real estate project

The Minister is still hesitant to take any of these two legal measures now, but prefers to continue discussions between UNESCO and Vienna.

Our comment

This means that time will be lost. Legal action is considered necessary. We fear the danger of losing again time and prefer immediate legal action in order to save the world heritage title for the „Historic Centre of Vienna (Austria) (C 1033)“.



Fig. 5: Round table discussion on April 13th, 2018, with Minister for Culture Mr. Gernot Blümel. Photo: Initiative Stadtbildschutz

L'viv: The Abandoned Heritage

Irina Nikiforova, Initiative for the St. Andrew's Passage



Fig. 1: Panorama of L'viv

Photo: Initiative for the St. Andrew's Passage

The city of L'viv was founded in the late Middle Ages where a settlement had existed since the Vth and VIth centuries. Due to its favorable geographical position for trade and political development, it grew to be an administrative, religious and commercial center. Today, the surviving architectural and artistic heritage reflects a synthesis of Eastern European traditions influenced by those from Italy and Germany. For decades, the city has deservedly been considered to be the Cultural Capital of Ukraine. In 1998, the ensemble of the Historic Center of L'viv was inscribed on the UNESCO World Heritage List. Its area includes 120 hectares of the medieval and renaissance parts of L'viv and the territory of the Cathedral of St. Jura on Holy Mountain.

It would seem obvious that the official recognition at the highest international level should give a great impulse to further development and prosperity of the city and provide its unique heritage with an additional protective status. Unfortunately, the present situation appears so critical that in the nearest future the cultural Capital of Ukraine may turn out to be the Capital of cultural disaster.

Since 2005, the World Heritage Centre and ICOMOS have expressed their serious concern about numerous construction and major restoration projects within the historic center of the city. In 2010, a serious warning about the possible inscription of the Site on the List of World Heritage in Danger was issued at the 34th Session of the Committee. As reported by the joint World Heritage Centre/ICOMOS reactive monitoring mission of March 2010, "The World Heritage Centre and the Advisory Bodies note, with deep concern, serious changes

in the urban fabric and the considerable threat to the Outstanding Universal Value, integrity and authenticity of the property due to the inappropriate rehabilitation methods resulting in a deteriorating of living-standards, the replacement of residences by hotels, the loss of inhabitants, a substantial visual impact of some developments".

Today, on the eve of its 20th anniversary of inscribing on the World Heritage List, the city faces the following challenges:

- Lack of a Strategic Management Plan and Urban Master Plan, as well as gaps in legislation, have caused a construction chaos in the historical center and the buffer zone of the Property. Hot spots are appearing almost monthly on the city map. According to our data, about 50 new large-scale buildings and major reconstruction projects have been started and implemented in the territory of the Property, and about 200 in the buffer zone during last decade. Only some of them were mentioned in the SOC reports by the State Party, and that does not meet the requirements of Paragraph 172 of the Operative Guidelines and the Decisions of the World Heritage Committee. The *know-how* of L'viv is the superstructure of multi-level attics on the historical buildings in the very center of the city. Very often the historical rehabilitation or appropriate regeneration of the monuments are replaced by reconstruction. This has resulted in serious irreversible changes of the urban fabric and the total demolition of the existing architectural ensemble;
- Up to 80% of the authentic buildings and architectural monuments on the territory of the Site have not been restored as they should have been, but reconstructed and rebuilt without any archaeological excavations. As a result, L'viv has lost a significant part of its valuable archaeological data and aesthetic appearance;

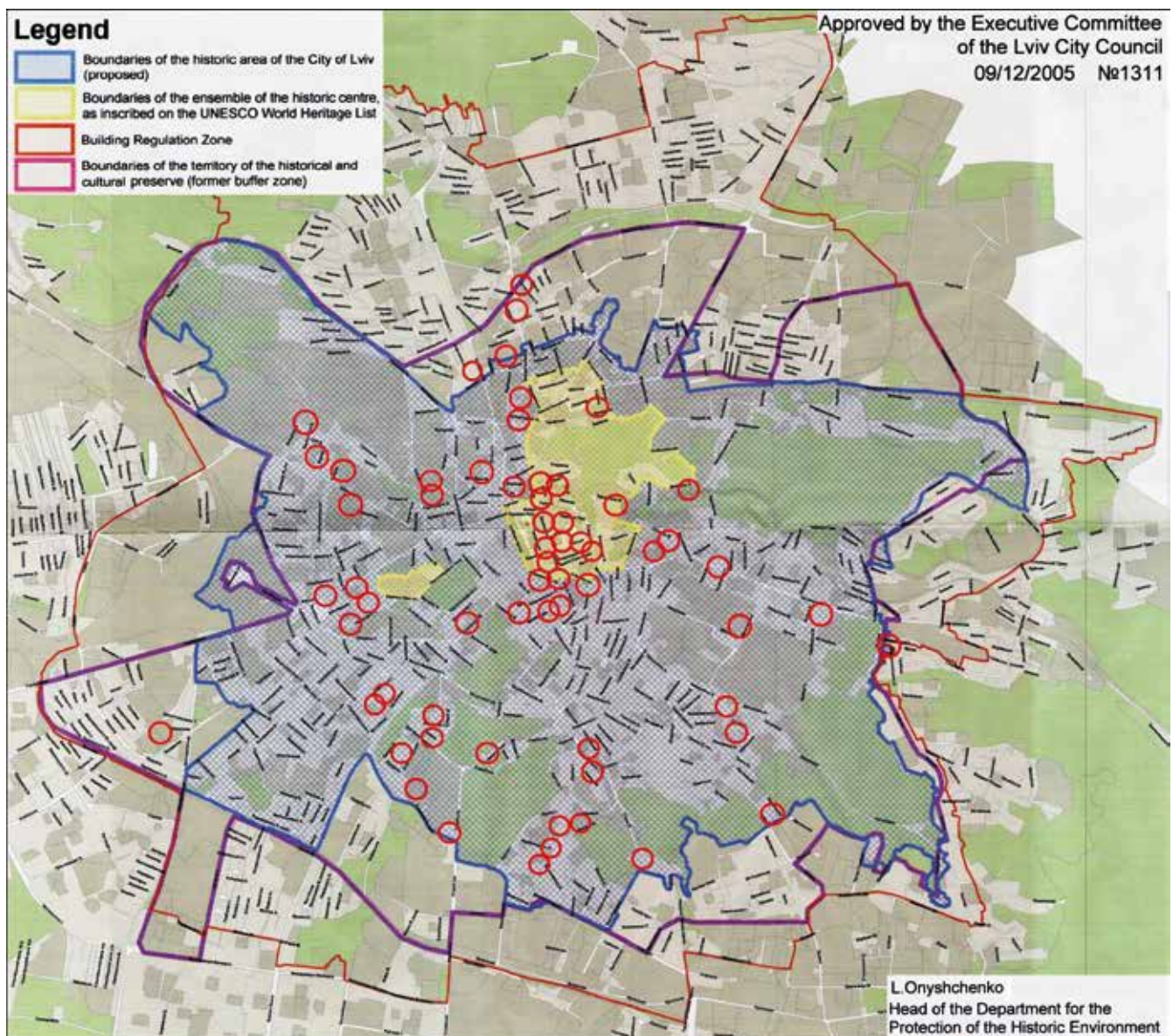


Fig. 2: Construction and major reconstruction projects in the Historic City of L'viv.

Map: L. Onyshchenko

- inadequate restoration / renovation of the old buildings. A lot of ancient buildings representing the unique appearance of L'viv are in an awful condition: leaking roofs, exfoliating plaster, flying off of elements of beautiful décor. The old buildings are expiring, losing their architectural value and former attractiveness. The State Party Reports usually look very optimistic: implemented glamorous projects; dozens of renovated roofs, façades and balconies in the center of the city; intensive social activity with a lot of seminars, conferences and festivals organized at national and international levels. In reality, this image looks far from ideal: new high-rise and dissonant buildings are being erected in the protected areas; historical buildings that are going to ruin not only because of such neighborhood but also due to the lack of financing for their appropriate renovation. Visiting L'viv, one has to be ready to experience a kind of cognitive dissonance;
- total ignoring and disregard to the opinion of the local community by the city authorities when taking decisions. So, widely advertised and supported by international funds, the *Synagogues Square* (The Golden Rose) Project turned out to be an example of an unsuccessful approach to the

national memory. The Project aimed at commemorating the history of Jews in L'viv and raising the awareness of common urban history and heritage among L'vivians and the visitors of the city. Unfortunately, it was negatively perceived and strongly criticized by some of the Jewish community because of, in their opinion, improper archaeological excavations, low-quality restoration works and the loss of the historical context of the area. In 2016, ICOMOS provided the Technical Evaluations and made some comments on the issue (see Fig. 3);

- It is often public pressure, rather than formal regulation, that prevents inappropriate development in the city. Today, the only actual and effective tool for protecting historic and cultural heritage is the civil society. They identify corrupt practices and schemes for the allocation of land lots in the protected areas, providing illegal permits and approvals, they inform the international community about the facts of these violations. They try to cancel these decisions in court, and sometimes these processes last for decades. Very often local residents are forced to block physically illegal constructions, preventing tree cutting, the traffic of construction vehicles, removal of soil from valuable archaeological sites.



Fig. 3: The Space of former Synagogues.

Photo: Franz Reschke

We can identify the following main reasons for the uncontrolled urban development and the alarming state of conservation of historical and cultural heritage in the city.

1. There are no such terms as the *UNESCO Property and its buffer zone* in the Ukrainian legislation on Cultural Heritage Protection. The nomination to the *UNESCO Property* is rather declarative and doesn't provide a real mechanism for its effective control and management. The protection and conservation of the territory were ensured by the status of „State Historical and Architectural Reserve“ which was founded in 1975 (as indicated in the nomination file). However, in 1991, the Management Body of the Reserve was eliminated, and subsequently the Reserve itself as a legal entity. Between 2009 and 2015, the President, the Ministries concerned, public figures and civic community demanded the restoration of the full-fledged activities of the Reserve, including court proceedings, but still, there were no results. Therefore, there is no officially functioning body that would perform the management of the Property „L'viv - the Ensemble of the Historic Centre“ today. The land lots on the territory of the World Heritage Site and its buffer zone are transferred to private property or long-term lease for the purpose of construction, without establishing a special legal regime of lands of historical and cultural significance. This permits potential investors to carry out economic activities on these lands that are incompatible with the regime of the Historical and Cultural Reserve and its protective zone. This has resulted in uncontrolled urban development and mass destruction of historical buildings on the territory of the Property and its buffer zone.
2. The processes of *decentralization* carried out in Ukraine have acquired a somewhat grotesque appearance in L'viv. The city authorities conduct a policy of a State in a State, having completely separated from the national bodies of executive power. In fact, all key decisions in the sphere of town-planning and urban development are taken exclusively at the local level, without any coordination or permission from the central authorities in the field of the Cultural Heritage Protection. The City Council of L'viv allows the allocation of land lots for construction purpose in the historical center, completely ignoring the requirements of the law and without any restrictions. As a result, even the territories of ancient cemeteries and places of mass graves fall under construction.
3. The major part of the monuments located on the territory of the Property and its buffer zone are not accounted for by the State in the relevant Registers of Objects of Historical and Cultural Heritage, which allows the owners to ignore their protective status. There are no legislative acts that would oblige the owners of historic buildings to sign protective contracts that should encharge them to follow the requirements for preserving their historical and cultural value and keep these buildings in a good condition. Therefore, the houses on the territory of the World Heritage Site are often bought by private individuals who deliberately bring these buildings to an emergency, destroy them with impunity, and erect new buildings that do not have any historical or architectural value, thus adversely affecting the Outstanding Universal value of the Property. We can state the absence of a unified concept of urban development, of local rules for approval of new construction and reconstruction projects, lack of systematic analysis of all major developments and conservation works within the property and its buffer zone with appropriate Heritage Impact Assessments and the systematic study of their visual influence.
4. Lack of transparency and information of the general public on the issues of the City Council's decisions, especially those concerned with land leases and the rights of private ownership for the historical and cultural monuments; information on the permits issued and the approvals adopted by the decision-makers in the sphere of cultural heritage is missing in the official resources.
5. The Law Enforcement Agencies, the local authorities, the bodies of protection of cultural heritage are ineffective and do not prevent the issue of illegal permissions and approvals for construction on the territory of the Property, as well as in its buffer zone. It is almost impossible to bring to responsibility those individuals and companies that are guilty of destroying historical and cultural monuments. The fines foreseen for such activity are minimal, and the working mechanisms for bringing them to criminal liability are not provided by law.
6. Insufficient, incomplete or delayed information of ICOMOS and UNESCO on possible changes (positive or negative) in the legislation, management, functioning of the Property and the current situation in the city: The only source of information for the World Heritage Committee and the Advisory Bodies are the monitoring missions reports, that occur quite rarely (the last one in 2012), and the State of Conservation Reports provided by the State Party. In practice, the State Party is not always interested in providing full and objective information on the State of Conservation of its Property and the most problematic issues of the Sites. As a rule, they look quite optimistic but a nice picture is sometimes far from reality.

At the same time, civil society and local activists and lawyers do not have access to the reports, recommendations, and other documents provided by the World Heritage Centre and ICOMOS regarding the most disputable questions. It is civil society that could become a reliable ally and faithful assistant for UNESCO and ICOMOS structures in the implementation of the Convention and following the Decisions of the Committee. Civil society in Ukraine is quite mature and professional, it is not subject to risks of corruption, and doesn't obtain any profit from its activity, unlike some officials or other decision-makers. Establishing a direct communication and a constructive dialogue could improve the situation and bring serious qualitative changes in the protection and preservation of the World Heritage Site.

On behalf of the community of L'viv, the NGO "Initiative for St. Andrew's Passage" addresses to the World Heritage Centre, the World Heritage Committee and the Advisory Bodies with a request:

- to take into account the information provided by the civil society of L'viv for further consideration;
- to include the *State of Conservation of L'viv – the Ensemble of the Historic Center* in the agenda of the World Heritage Committee's Session as a matter of urgency;
- to urge the State Party to submit to the World Heritage Centre, in conformity with Paragraph 172 of the *Operational Guidelines*, details of all major developments (new construction and major reconstruction projects) and conservation works within the Property and its buffer zone, with appropriate Heritage Impact Assessments (HIAs);

- to recommend the State Party to invite an ICOMOS monitoring mission for the inspection and evaluation of the State of Conservation of the Property.

References

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- State of Conservation L'viv – the Ensemble of the Historic Centre (Ukraine): <https://whc.unesco.org/en/soc/526>
- State of Conservation Report by the State Party (2016): <https://whc.unesco.org/document/155524>
- Construction of a new shopping center next to the Jakub Glanzer synagogue – video: <http://jewish-heritage-europe.eu/2012/08/21/video-of-construction-around-glanzer-synagogue-in-lviv>
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- Disputable construction in L'viv: <http://forpost.lviv.ua/txt/kultura/849-torgovtsi-l-vovom-yak-sadovij-ta-sinyutka-viganyayut-lviv-z-yunesko>
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Photographic Documentation:

Destruction of old, and constructions of inappropriate new buildings in the Historic Center of L'viv

All photos by the Initiative for the St. Andrew's Passage



Fig. 4: Villa Lucia, Svetsitskogo str., 16 (buffer zone)



Fig. 5: The Palace of Besyadsky under ruination.



Fig. 6: Vesela str., 5. New construction without permits (buffer zone)



Fig. 7: Awful condition of the Jewish Quarter ruins - Fedorova str., 23-28 (core zone)



Fig. 8: Awful condition of the Jewish Quarter ruins - Fedorova str., 23-28 (core zone)



Fig. 9: L'viv, Mitskevicha square, 9, (core zone)



Fig. 10: Non-conforming buildings in the buffer zone (Ivana Franka str., 102)



Fig. 11: New construction in Shyhevicha str., 3 (buffer zone)

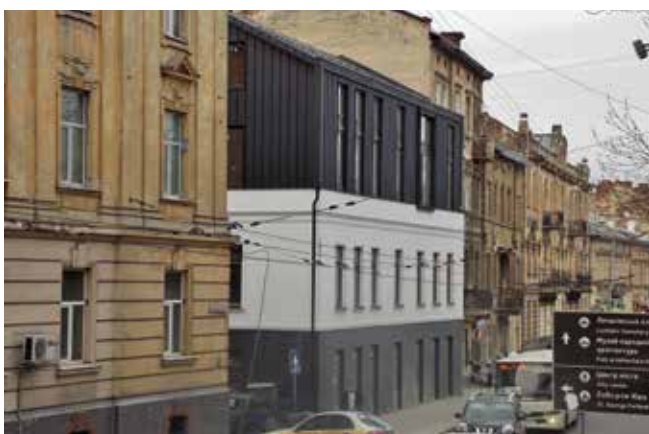


Fig. 12: Shota Rustaveli str., 12 (buffer zone). "Reconstruction" of the old building.



Fig. 13: Non-conforming building in the buffer zone (Snopkivs'ka str., 18)



Fig. 14: Arsenal'na Square (core zone)



Fig. 15: The courtyard in Staroevreys'ka str. 9 (core zone)



Fig. 16: Zvenigorodska Square, 3 (core zone). Violation of height parameters.

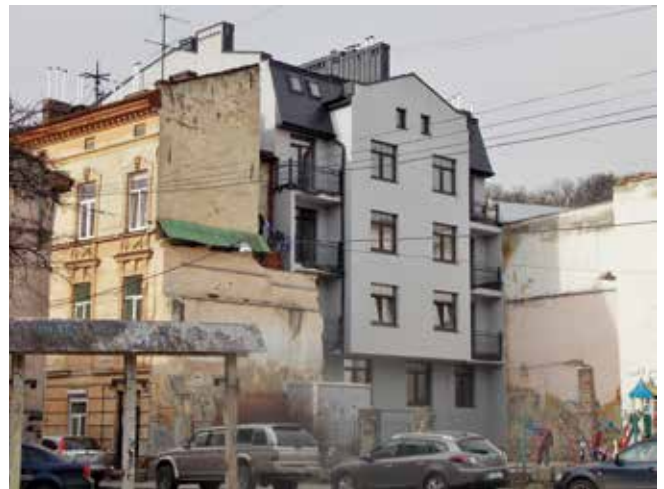


Fig. 17: New building in Knyazya L'va str. (core zone)



Fig. 18: B. Khmel'nitsky str., 27. New construction in the buffer zone



Fig. 19: The "know-how" by L'viv: the superstructure of multi-level attics

Gjirokastra's Monument Drain

Kreshnik Merxhani (Forum for the Protection of the Values of Gjirokastra) and Valmira Bozgo



Fig. 1: A 2nd category monument, the Mezini house, collapsed in 2014.

Photo: Kreshnik Merxhani

Fifty seven years ago, Gjirokastra was declared a Museum City. Since then, changes and challenges in the management of the site have been numerous. After 1990 a very different set of problems began, taking into consideration the serious political and socio-economical shifts that the whole country experienced. Abruptly, Gjirokastra saw the dissolution of the administrative and professional structures that administered the conservation of the Museum City, while just as confusing were the changes in legislation and the role of the state in this process.

In 2005 Gjirokastra was enlisted as a World Heritage Site, being in compliance with UNESCO's criteria iii and iv, emphasizing the Outstanding Universal Values of the urban and architectural ensemble of Gjirokastra¹. The World Heritage site is valued for the embodiment of the diversity of the urban societies of the Balkans, and the longstanding ways of life, which have today almost vanished. However Gjirokastra fosters a living historic centre, thus the preservation of the Outstanding Universal Values deserve constant and careful consideration. The town planning and housing of Gjirokastra are those of a citadel built by distinguished landowners that had high connections to the

government of the time. The site contains various types of monuments and vernacular urban housing of the classical Ottoman period, built in continuity with the various Medieval cultures which preceded it; demonstrating also a state of peaceful coexistence with the Christian minority, creating thus an architectural and urban ensemble that is deemed unique. The historic centre is comprised of a total of 615 monuments enlisted as 1st (56 monuments) and 2nd category (559 monuments)².

The list of cultural monuments and its link to the OUVs

The importance of the list of monuments and their protected status in the historic centre of Gjirokastra is directly linked with the paramount need for conserving the urban and architectural ensemble, as the core of the Outstanding Universal Value for this World Heritage site. Their status clearly and by law determines the types of allowed interventions, the means and methods of co-financing among state and owner, in order to ensure the preservation of these values as well as the penalties in any cases of infraction. Consequently, any omission or amendment to this list has the potential of putting the entire ensemble at risk.

A history of Gjirokastra's monuments

In 1961 Gjirokastra was declared a Museum City by Decision of the Council of Ministers no. 172 dt. 02.06.1961. This decision was then accompanied by a Regulatory Document drafted by Prof. Emin Riza and Arch. Gani Strazimiri³. The city's zoning and the monument's list first appear in 1973 by means of a public-

¹ <https://whc.unesco.org/en/list/569>

² <http://whc.unesco.org/uploads/nominations/569rev.pdf>

³ Riza, E. "Museum city, clear witness of vernacular creativity" pg. 109-113, published in "Knowing our cultural monuments" by the Institute of Cultural Monuments, Tiranë 1967.

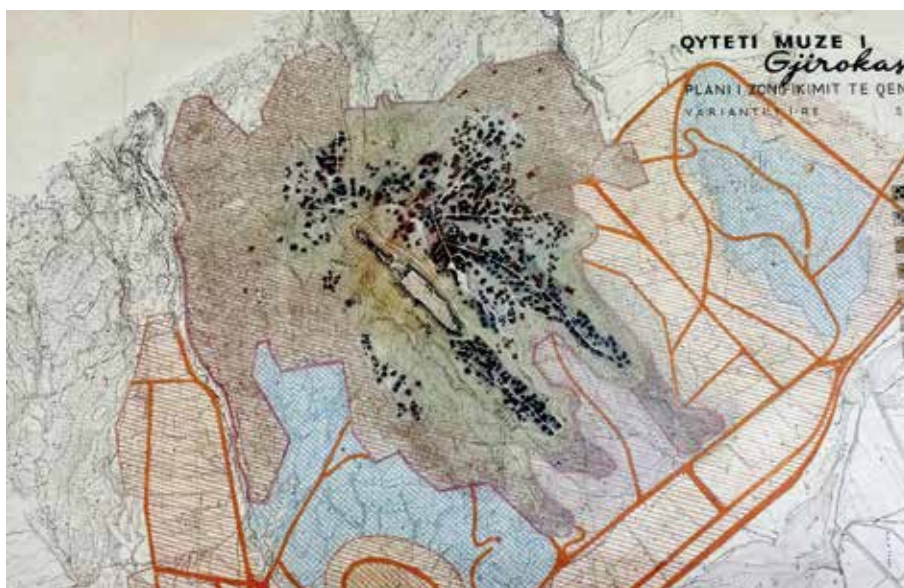


Fig. 2: Original Zoning Plan of the Museum City.

Source: 1974 Gjirokastra Regulatory Plan, now in the technical archive of the Institute for Monuments of Culture (IMC)

published the monograph “The Museum City of Gjirokastra”⁶. From 1961 until today, but more notably between 1961–1990, there is an extensive body of works depicting elevations and other documents for over 450 monuments of the IInd category. These works are now in the Technical and Scientific Archive of the Institute of Cultural Monuments of Albania.

In 2005 Gjirokastra was declared a site of World Heritage placed under the protection of UNESCO based on criteria iii and iv. In the application dossier submitted by the Albanian authorities to UNESCO, there are a total of 559 monuments of the IInd category.

ation in the Monuments Magazine No. 5-6/1973. During this year a zoning plan was drafted as an integral part of “The regulation on the protection, restoration and administration of the Museum City of Gjirokastra”. The document outlines the criteria, limitations and norms for future regulatory plans. In 1974, a Gjirokastra Regulatory Plan was approved with the same zoning set by the 1973 regulation.

The plan outlines 7 distinct zones: (1) Museum city of the historic centre, (2) Protected zone of the historic centre, (3) Free zone, (4) Zone protected from any construction, (5) Development zone of the city, (6) Development zone that takes into consideration the view of the historic centre, (7) Green zone.

According to article 8 of this regulation: “Monuments of IInd Category are all other objects⁴ conserved within the historic centre (museum city and the protected zone). These objects, with their values, play a first hand role in the integrity and wholesomeness of the urban, architectural and environmental ensemble of the historic centre”.

Article 19 states: “Attached to this regulation is the list of the cultural monuments of the Ist category and the Zoning Plan of the Museum City containing a zoning delimitation map including an annotation for each cultural monument classified as Ist and IInd category, placed under protection”.

The regulation entered into force on July 12, 1973⁵. This list of monuments and the study of vernacular architecture in Gjirokastra would later be enriched by Prof. Emin Riza, who in 1981

List reductions of 2016

In March 2016 the Albanian authorities, after a site assessment, reduced the list of monuments of the IInd category from 559 to 323 objects. This reduction according to the authorities was based on the lack of specific listing and requests from UNESCO through its Reactive Monitoring Mission of 2012. The civil society engaged in preserving the OUV of Gjirokastra have repeatedly asked for the specific criteria used in this assessment, however no further information or clarification has been issued by the authorities on this issue.

From a careful consideration of the 2016 monument listing, while taking into account the state of the monuments, we identify the following discrepancies:

1. The reduction of the number of monuments by 43%, leaving out objects that deserve the monument status.
2. Discrepancies in object names when compared to the UNESCO or previous lists of the National Institute of Monuments. In all other lists monuments are known by the family name of the property owner which in most cases is a patriarch or the grandfather of the current residents.
3. New monuments appear in the list for the first time. Some of these are illegal constructions, built during the 1990s, containing none of the characteristics of the monuments of the Historic Center and the Protected Zone, while monuments embodying the OUV have been delisted.⁷

4 Monuments of the Ist category are declared by a separate decision.

5 “Monuments Magazine”, 5-6/1973, pg 211-213, Tirane 1973.

6 Riza, E., “Museum City of Gjirokastra”, «8 Nëntori» Publishing House, Tiranë 1981

7 During the 41st session of the WHC, the State Party declared that the list is not final. In their decision WHC/17/41.COM/18, p. 117, WHC urges the state party to finalize proceedings, however no developments have taken place since, while the list remains an approved administrative decision by the IMC.

4. The listing names 35 monuments with very vague descriptions such as “2–3 floors stone building with gray walls and stone roofs, concrete slab”. This causes much confusion and a total disconnection with the archive documents.
5. The procedure followed for the new listing is unclear and does not fall in line with previous procedures (study, monument passport, other documentation, elevations, and photographic material, and a technical report)
6. Below is an example of a new listing and a listing that has been redacted, showing a complete lack of understanding of the OVU.



Fig. 3: New listing. Example (Dec. No. 60 – Dt. 11.03.2016) in Palorto Neighborhood No.60/8) of an inappropriate new building in the Historic Center damaging the integrity of the entire ensemble and the OVU
Photo taken from the 2014 State Report described as New Building within the Historic Center of Gjirokastra



Fig. 4: Delisting: A traditional House in Hazmurat neighborhood that is now deleted from the List of Cultural Monuments. The house features the traditional roof, stable, windows and stone walls and has only some minor interventions like the metallic eaves in the ground floor that can easily be removed. Photo: Kreshnik Merxhani

Lack of a management plan and the Torresi Study⁸

Many of the recent problems in the historic center of Gjirokastra come from the lack of an approved and functional management plan for the site, which has been repeatedly requested by UNESCO. However the Municipality of Gjirokastra in collaboration with a group of Italian experts (Studio Torresi), finalized a study that was almost eight years in the making. The study evaluates geological and seismic risks as one of the most important challenges of the city, and further proposes a restoration plan for the state of the cultural monuments. For this reason it is also quoted on the official site of UNESCO⁹. However the plan was not approved and Gjirokastra has now entered into a period that the local NGOs refer to as the History of Neglect.

The always deepening problems of this History of Neglect in our view are as follows:

1. Lack of capacities and unclear role of local and national institutions for the preservation of the OVUs of Gjirokastra.
2. New development projects that could do more harm than good, not being based on a proper management plan for the historical center, and neglecting the priorities of the historical center and the protected zone of Gjirokastra.
3. Degrading environmental conditions and loss of green space in the historical center which goes against the principles of landscape and geological conservation.
4. Institutional and social drain; only recently Gjirokastra's archive was moved to the city of Fier. Being the district with a 5% annual decline in population, the dislocation of institutions and loss of people seem to correspond with the degradation of monuments due to non-use, and lack of targeted investments.
5. Legalizations¹⁰ of illegal constructions, a process that introduces abusive interventions into the protected zone and historical center, damaging the site's integrity and reducing its OVUs.

Conclusions

With regards to illegal constructions, the government of Albania has recently made real progress with stabilizing the situation with a moratorium on construction in 2014 that put an end to this practice. As a result of that, in 2015 by means of Decision of the Council of Ministers (DCM) procedures were laid out for legalizing some of these constructions when deemed

⁸ <http://www.studiotorresi.it/sito/en/testi-pubblicazioni/62-piano-di-recupero-del-centro-storico-di-gjirokastra-zonizzazione-di-piano-normativa-di-attuazione.html>

⁹ <http://whc.unesco.org/uploads/nominations/569rev.pdf>

¹⁰ DCM no. 280, dt. 1.4.2015, amended by DCM no. 756 dt.26.10.2016

necessary, and where the criteria of the object built was not in disconformities with general development plans. In the case of historical and protected zones this DCM was clear. No legalization process can be undertaken in such an area. A year later this decision was amended by DCM no. 756 dt. 26.10.2016, which adds that legalization can be undertaken in protected zones for objects that have lost their protected status. This, combined with the discrepancies of the new listing in Gjirokastra creates a problem that gives way to legalizing external extensions or even floor additions to objects that are not on the list, or where the current listing is unclear, seriously endangering the OUVs of the architectural and urban ensemble of Gjirokastra.

On the 41st Session of the World Heritage Committee held in Krakow, Poland, we submitted a resolution to the Committee to stop the History of Neglect in Gjirokastra. The problem of the delisting of monuments was also stated in this resolution. We are still facing the fact that the original monument list is risking serious drainage. In the conditions of the lack of a management plan we fear more monuments will fall through the cracks of forgetfulness, while illegal interventions are being legalized and the state of the Outstanding Universal Values of Gjirokastra will decline.



Fig. 5: Illegal interventions in the Dunavat quarter ensemble. Photo: Kreshnik Merxhani 2014

Diyarbakir: a World Heritage Site Destroyed Deliberately by Turkey While UNESCO Keeps Silent

Ercan Ayboğa, Nevin Soyukaya and Necati Pirinçcioğlu, Platform
"No to the Destruction of Sur, Diyarbakir/Turkey"

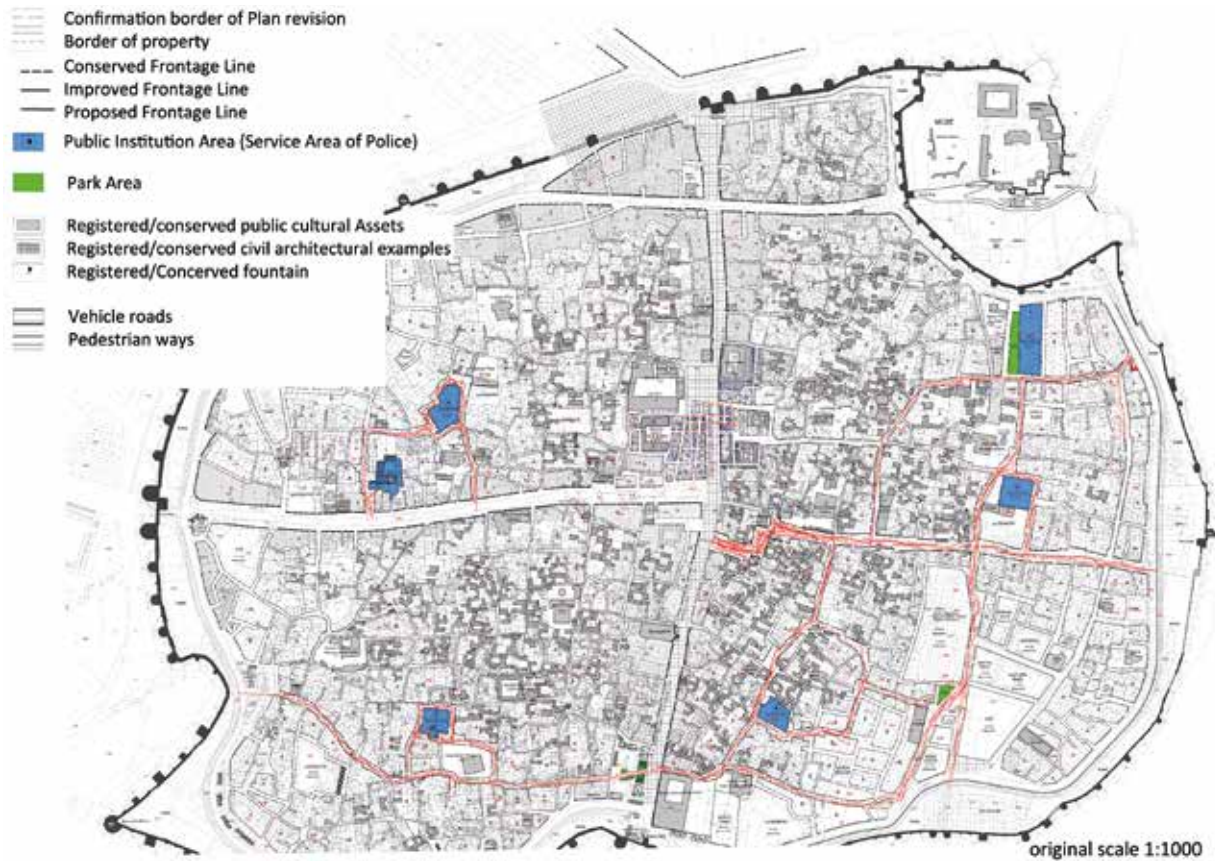


Fig. 1: Revised Sur Urban Conservation Plan.

Source: The authors

Over 4,000 years, the city of Diyarbakir, situated in the mainly Kurdish Southeast of Turkey, has housed successive civilizations of the East and West, and functioned as a political and economic center of geopolitical importance. With its multi-lingual, multi-cultural and multi-layered character the fortified old city hosts 600 cultural properties, and the antique Hevsel Gardens which lie between the fortress and the Tigris River.

In 2012, a strong coalition of civil society actors and municipalities in Diyarbakir revised the "Urban Conservation Plan" for the fortified old city, called Sur or Suriçi, based on high priority social, cultural, and ecological criteria. They convinced the Turkish Government to nominate the site for the World Heritage List, and in 2015 the "Diyarbakir Fortress and Hevsel Gardens Cultural Landscape" were inscribed as a World Heritage (WH) Site.

Sadly, since September 2015 and following the breakdown of the 2,5 years' negotiations between the Turkish government

and Kurdish opposition to solve the Kurdish question, the renewed civil war has reached Diyarbakir. Over several days police operations were carried out in Sur, and each time 24-hour blockades, called curfews, were declared by the state.

With involvement of the military and heavy weapons, including tanks, the 6th curfew started on 11.12.2015 in Sur. The armed conflict, which ended officially on March 10, 2016, led to the death of some hundred people. Today the curfews still continue in five of six affected neighborhoods of East Sur. It is estimated that during the armed conflict around 400-500 buildings have been destroyed completely or mostly (there is no official governmental information). The fortress, part of the inscribed WH property, which was used by the Turkish military for their operations; it has suffered some damages.

It is important to point out, however, that the principal physical destruction in Sur happened after the official end of state

operations. In the blockaded areas, teams of the Ministry for Environment and Urban Planning started to systematically destroy also non-damaged buildings, including monuments, using heavy equipment. The narrow roads have been broadened and entire parcels have disappeared. In East Sur the demolition continued until summer 2017. Debris has been continuously excavated, quickly and roughly, and taken to different deposit sites. During this destruction the Turkish government did not make any serious effort to rescue authentic elements of monuments among the debris. All these actions have violated existing Turkish laws and regulations.

Parallel to the destruction process, the Turkish government issued an expropriation order of Sur on March 21, 2016. This order had the objective to transfer Sur entirely to the government, and it includes also old mosques and churches. Up to now the expropriation has been implemented for a majority of the destroyed sections. Government has offered late, negligible financial support to people removed from subsequently destroyed areas.

In the meantime all local municipalities within Diyarbakir city, who had criticized the Government's policy on *Sur*, have been seized. A state appointed commissioner was installed in November 2016, based on a decree made possible under the state of emergency. The local mayors were arrested, and the Urban Conservation Plan of Sur was revised immediately giving a legal

basis for the destruction in progress. In the security oriented revision of the plan, schools for instance have been turned into police stations, but no alternative educational areas were determined. Areas around police stations and streets connecting them have been widened to allow for the passage of military vehicles.

Prior to seizing the municipalities, when the WH Site Management was situated in the Diyarbakir Metropolitan Municipality, it was never permitted access to the affected area in Sur. All calls to the Ministry for Tourism and Culture to intervene against the destruction of monuments and buildings were disregarded while so-called „scientific commissions“ were formed which justified the ongoing destruction.

In May 2017 the Turkish government started the complete destruction of the two neighborhoods of Lalebey and Ali Pasha in Southwestern Sur where no armed clashes had happened. After months of protests by inhabitants and significant parts of civil society, the houses of thousands of people were demolished, with heavy police presence. The justification was a rehabilitation project of 2011 which the responsible municipalities had nullified already in 2013 because of the Government's non-fulfillment of commitments.

Satellite images from May 2016, August 2016 and July 2017 show the progressive destruction of buildings and areas in Sur.



Fig. 2 and 3: Aerial photos of Sur (a) before June 2015, and (b) after the destruction, July 2017.

Source: The authors

While in East Sur the number of completely destroyed and subsequently erased buildings was 832 (10,7 hectares destroyed) in May 2016, the number increased to 1519 (20,3 hectares destroyed) in August 2016 and to 3569 in July 2017. This equals an erased area of 46,3 hectares. If we add 806 destroyed buildings from Southwestern Sur, there are 4376 destroyed buildings which raises the toll to 58 hectares, that is to 40 % of the old city area and home to approximately 23.000 people.

A total of 170 monuments, i.e. architecturally registered and conserved civil and public buildings, have been destroyed or

for such inappropriate new constructions. Similarly, since late 2017, hundreds of buildings are under rapid construction in the destroyed parts of Southwest Sur.

Under the new housing projects the government has built basements and installed new pipes for water, waste water, and electricity, even though Sur has had no serious challenges with water and electricity supply since 2002 when the municipalities had carefully improved infrastructures. Building pits of three or more meters were dug for this purpose. As this area has a settlement history of at least 4000 years, and as in Diyarbakir the



Fig. 4 an 5: WH property "citadel area" (a) before (with historical monument) and (b) after the park construction.

Source: The authors

damaged in Sur according to the satellite photo dated August 2016. In detail: 89 monuments of civil and public value have been destroyed completely and 40 partially; 41 monuments have been damaged. Of these 170 registered structures 76 are of civil, 13 of monumental significance and 81 marked as environmentally significant buildings. With the destruction after August 2016 the number of destroyed or damaged monuments is likely to have risen further.

One of the destroyed registered monuments was located in the citadel which is part of the inscribed WH property. After the Regional Board for the Conservation of Cultural Assets canceled its conservation status, it was destroyed in order to build a park in 2017. For the park construction, excavations of two meters have been done at several locations. Originally the inhabitants had left this area years ago to allow for excavations since underground antique monuments, including a Roman amphitheater, had been detected.

In spring 2017 the construction of new 60 buildings started in the erased East Sur. They have been built with reinforced concrete, with no typical courtyards and in big distances from each other – a deviation from the historical old city fabric and traditional Diyarbakir houses. Critics point out that the revised and extremely weakened Urban Conservation Plan opens the door

houses traditionally had no basements, it is safe to assume that these works are destroying the extensive archaeological layers underground.



Fig. 6: New buildings in Southwest Sur, April 2018. Source: The authors

The destruction of the WH site is not limited to the old city. The Ministry for Environment and Urban Planning has put in action the „Tigris Valley Project“ which had been canceled during the UNESCO application process in 2015. Since spring 2017 Gov-

ernment has constructed many buildings in parts of the unoccupied buffer zone in the Tigris Valley, and it foresees significant commercial buildings and activities – all in violation of the agreed Site Management Plan. It has also started to canalize the bed of the river, and plans an artificial pond. The whole ecosystem of the river, which was planned by earlier elected municipality administrations as a wildlife area, is in danger. Even the Hevsel Gardens, part of the inscribed WH property, are threatened by these works.

In August 2017 the Turkish government decided to do “urban transformation” in the two neighborhoods of Feritköşk and Dicle with their 9000 inhabitants situated in the buffer zone of the Tigris Valley. This transformation is justified on the basis of poor construction conditions – an argument that holds partly true. As this area is of interest for investors, the planned new buildings will be sold at a high price, making them unaffordable for the former, mostly poor inhabitants. Again, these plans violate the original Management Plan, which foresaw that nobody needs to be displaced, and that the population’s living conditions will be improved with different measures and technical-financial support.

In summary, in half of Sur, apart from the destroyed buildings, the original street fabric and the insular-parcel integrity have

Request to the UNESCO World Heritage Committee:

1. The UNESCO WHC and its Advisory Bodies should send immediately a Reactive Monitoring Mission to Diyarbakir without waiting for an invitation by the Turkish State Party. This mission should also meet displaced and local people from Sur, and from all civil society organizations working on Sur.
2. The Turkish government and the municipalities of Diyarbakir have to stop immediately all kind of actions at the WH Site, including its buffer zone, particularly the destruction of buildings and other structures, removal of debris, expropriation and displacement of local inhabitants, construction of new housing projects and the „Tigris Valley Project“.
3. The decisions to expropriate 82% of Sur, dated on March 21, 2016, and the revision of the Urban Conservation Plan, dated on December 2016, have to be canceled.
4. All further assessments, documentation and urban design plans must be done with the participation of affected people, broad civil society (chamber of architects/engineers, unions, human rights organizations, cultural associations) and independent scientists from different fields in an open and participative process. The UNESCO WHC should be consulted directly in this process.



Fig. 7: Tigris River in the buffer zone under destruction through canalization, March 2018.

Source: The authors

been irreparably lost. The forced exodus, followed by the expropriation decision of the Turkish government, has led to the eradication of ways of life, trade, and urban memory grown over thousands of years. Propriety and demographic structures have changed, disrupting cultural continuity. Adding to this, the current “Tigris Valley Project” is another big threat to the WH Site Diyarbakir outside of the fortress realm which should not be underestimated: If all plans of the Turkish government would be implemented, the WH Site of Diyarbakir could entirely lose its core values and uniqueness.

5. The destroyed parts of Sur should be reconstructed according to the former Urban Conservation Plan (approved in 2012) and the WH Site Management Plan (dated 2014) with a strong participation by civil society and inhabitants of Sur, including the displaced ones. The latter should return to their former neighborhoods without being charged.
6. If the Turkish government rejects the above mentioned points the WHC should call the UN Security Council based on the UN Security Council resolution 2347 (March 2017) on destruction and illicit removal of cultural heritage.

Historic Cairo – A Plea for World Heritage in Danger

Judith Angl, proheritage



"Note was taken of the concern expressed by ICOMOS at the problems involved in safeguarding this site" (UNESCO 1979, p.12)

This addendum in the World Heritage Committee's (WHCom) decision document marks the inscription of Islamic Cairo on the World Heritage List (WHL) in 1979. Despite numerous national and international efforts to preserve the World Heritage Site (WHS) in the past decades, the urban property has undoubtedly lost some of its site values. The reason for not designating them as Outstanding Universal Value (OUV) is that no officially recognised retrospective Statement of Outstanding Universal Value (rSOUV) exists to this day. The Advisory Bodies have repeatedly stressed how vital a rSOUV is for understanding a WHS's character and defining adequate preservation measures.

The recent UNESCO-initiated Urban Regeneration for Historic Cairo project (URHC) published a draft rSOUV in 2014 (URHC 2014b, pp.44-48) which is based on the ten-page nomination file (URHC 2012, p.20) and other project surveys. However, the ICOMOS evaluation of 1979 is the document which must be primarily consulted as it carries more weight for a rSOUV preparation (ICOMOS et al. 2010, p.8). "Credible sources that are able to provide an assessment that is contemporary with the time of inscription" (ibid.) can complement the draft. Suppos-

edly as a result of this shortcoming, the sugarcoating of realities and omission of relevant information (Angl 2016, pp.13-14), the rSOUV was rejected and a revised draft requested by the WHCom in 2015 (UNESCO 2015, p.113). In 2017, the WHCom did not touch on the issue but instead pressed again for the submission of a management plan (UNESCO 2017, pp.155-156). **However, there are a number of factors why the WHS's OUV should be reconsidered altogether before further steps are taken.**

Since nomination and inscription processes had not been well established in the 1970s and 1980s, the property's boundaries and attributes were only "roughly" (EAO 1979, p.2) defined in the nomination. Moreover, the file was prepared with cartographic material and literature published in the 1940s and 1950s and based on surveys that had been carried out at the beginning of the 20th century (EAO 1979, p.2). However, major urban and demographic changes have taken place since the middle of the 20th century (Raymond 2007, pp.342-349). Therefore, it is little surprise that instead of "600 buildings of historic and artistic value" (EAO 1979, p.8), which were praised in the dossier, only 400 were actually left in 1979 (Sykora et al. 1993, p.4-1). After inscription, the loss of structures was compensated by listing 19th century buildings, and the WHS counted 520 monuments in 2007 (Mayer and Speiser 2007 p.9). **Therefore, there are discrepancies regarding the site's physical attributes and values.**

Adding to the confusion, the URHC clarified boundaries a second time in the site's history (UNESCO 2008, p.224), supposedly complementing the draft rSOUV. However, these new boundaries completely differ from the areas that were identified in the nomination and evaluation document, or the boundary clarification of 2008. **Entire districts and new attributes that do not support the OUV were arbitrarily added to the serial site.** In summary, the property now encompasses all historic eras, ranging from the earliest Roman structure to early 19th century buildings, and developments that are not considered European-inspired Cairo. A map (see Fig. 1) puts the past and present boundaries in contrast: the brown and beige areas represent the WHS and buffer zone in the URHC's understanding, the red and blue lines indicate the boundary and buffer zone clarification of 2008. Surprisingly, the WHCom adopted these new boundaries in 2015 (UNESCO 2015, p.113) when in fact a renomination was necessary since

1. the site was subject to major boundary modifications and
2. the site obtained new attributes that do not reflect the initial values. (ICOMOS et al. 2010, pp.11, 15)

For more than 20 years the WHCom has urged the State Party to "use appropriate techniques" (UNESCO 1998, p.16) for monument conservation. In the 1990s, the WHCom noted tremendous violations on monument authenticity, affecting major historic mosques which were renovated or partly torn down and reconstructed in concrete (UNESCO 1995, pp.26-27; 1997, p.26). ICOMOS mission reports of 2001 and 2005 harshly criticise the installation of spotlights in pavements and monuments, transforming the place into a "stage set" or "amusement park" and historic water basins into "modern jacuzzi[s]" (ICOMOS 2001, p.6; 2005, p.6). In recent years ICOMOS mission experts got to see or were shown selected monuments and areas by the Egyptian authorities, resulting in "spectacular" (ICOMOS 2008, p.14) or no restoration assessments (ICOMOS 2014, p.10). However, there are innumerable documented

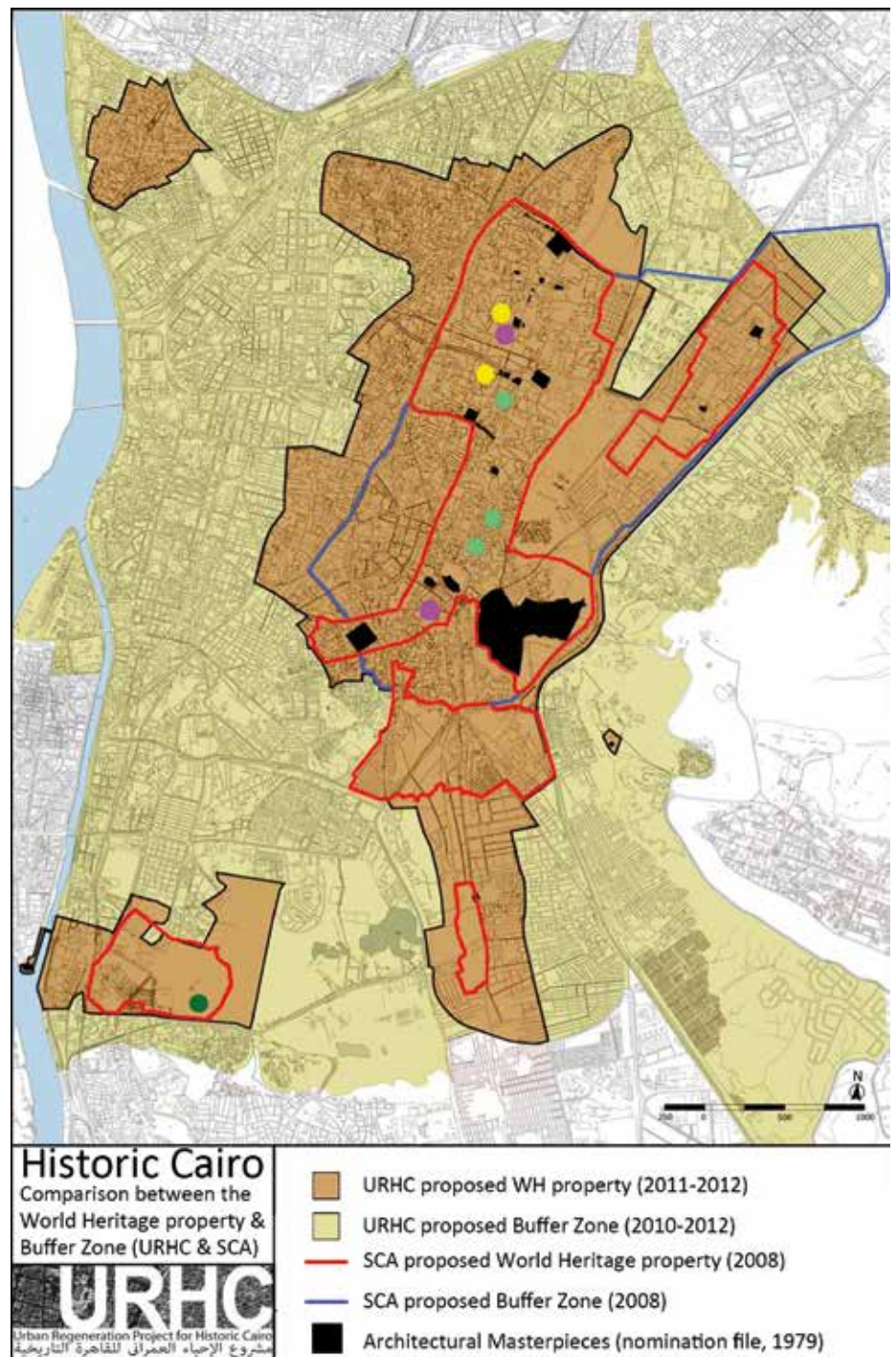


Fig. 1

and observable conservation attempts and presentation techniques which do not meet adequate standards (see Fig. 2-5).

Historic Cairo accommodates residents who cannot meet basic human needs (URHC 2012, p.79), but monuments are re-used as libraries, souvenir shops, museums and upscale event venues. The grandest mosques serve as sightseeing attractions instead of being used for purposes benefitting the local population. As a consequence of generally being excluded from decision-making processes, some residents have developed resentment against several reused buildings and the managing authorities. Luckily, there has been an initiative (*Athar Lina*) which introduced community-oriented services in historic



Fig. 2



Fig. 3



Fig. 4



Fig. 5 Photos: Judith Angl 2014 - 2016



Fig. 9 Photo: Hassan, et al., 2012



Fig. 6



Fig. 7



Fig. 8 Photos: Judith Angl 2014 - 2016



Fig. 10 Photo: ICOMOS 2008, p. 16

buildings, tried to tackle negative emotions and foster positive associations through a number of activities. (al-Ibrashy 2014, p.9; Bakhoun 2014, p.26; El Ansary and al-Ibrashy 2014, pp.21-22, 28-29, 43; URHC 2014b, pp.33, 35; al-Ibrashy 2016, pp.48-50)

Authorities often cancel and modify religious processions and local festivities citing security concerns and the prevention of traffic congestion. However, the festivities involve many other forms of intangible heritage, e.g. oral recitations, decorations and traditional dishes, and are actively celebrated by the local population (Schielke 2009, pp. 85-88, 91-92; El Ansary and al-Ibrashy 2014, p.41). The area's traditional commercial division, the differentiation of activities and traditional crafts and building techniques are severely threatened by the economic and physical deterioration in the districts, product substitution through mass-produced and imported commodities, lack of awareness, absence or insufficiency of legal regulations, and environmental issues. (ICOMOS 2014, p.10; Waked 2014, pp.25-26)

In this regard, the top-down management approach needs to be mentioned which can be found in the URHC's final report (URHC, 2014a, p.20). Even though it may signify the matter being a top state priority, the actual professionals are located at the end of the food chain with no obvious decision-making power. Civil society is not even considered part of the hierarchy though the recent SOC report mentions "the importance of local community participation and the engagement of Egyptian and foreign visitors" (UNESCO WHC 1992-2018, p.1).

Another harm to the area's authenticity and integrity are the legally defined aesthetic boundaries and monument buffer/antiquity zones. They are occasionally identified for monu-

ments and follow no clear identification criteria (URHC, 2014b, pp.20-21, 39). Aesthetic boundaries are often set up around monuments and push out services that have been connected to the buildings for centuries, or deprive residents of leisure space, e.g. street cafes and open areas (El Ansary and al-Ibrashy 2014, pp.16-18, 21). Monument buffer zones prohibit interventions and modifications of any kind. Some zones are extremely large and can include entire neighbourhoods. As a result, the urban fabric in these areas is in extremely poor condition (see Fig. 6-8), forcing some residents to improve housing stock by themselves which is then considered a violation of policies. In many cases, dilapidation was cited to justify the demolition of historic buildings all over the property (El Ansary and al-Ibrashy 2014, pp.24-26; ICOMOS 2014, p.10; URHC 2014c, pp.4, 41, 43-44). The State Party has only recently addressed this problem by issuing a decree on demolition permits (UNESCO WHC 1992-2018, p.1), which requires monitoring.

Whether driven out by authorities or inhumane living conditions, many local residents are forced to look for shelter elsewhere, and urbanisation adds to the pressure: more and more appropriation of spaces and historic buildings occurs, illegal/informal constructions and settlements spring up in and around the property (ICOMOS 2014, p.10; GOPP 2012, p.38; n.d., p.3). The situation is especially critical in the historic cemeteries where increasing parts of the population have taken refuge in and around historic mausolea in the last decades. Illegal high-rise buildings impact the site's visual integrity while the sepulchres were impacted by sewage or ground water. Many are in ruin and surrounded by waste or were partly demolished in the 1990s for the sake of *more significant* monuments. (El Kadi and Bonnamy, 2007, pp.7, 9-10; al-Ibrashy, 2013, pp.61, 64, 67)

Cairo's first Arab settlement of al-Fustāt has faced another tragic development. Only one seventh of the archaeological site had survived in 2008 when ICOMOS (2008, p.13) published a statement: "[...]his area [...] is in the very last moments of retaining some of its OUV[...] and we are now confronting the very last chance to preserve this part of the WH property." However, further negative development has contributed to the site's ruin which is not even governed by the Ministry of Antiquities anymore. In 2014, a civil society campaign provided images of the archaeological remains being nearly completely eroded, and garbage piling up in the vicinity (Save Cairo 2014; Zeinobia, 2014a-b). "Swamps" (Hassan, et al., 2012) or moist soil, resulting from risen groundwater, cover the entire space (see Fig. 9 and 10). (ICOMOS 2008, pp.12-13; Hassan, et al. 2012; El-Gundy 2014)

In conclusion, both *the property as defined in 1979 or in the rejected rSOUV cannot demonstrate proper OUV*. The inclusion of different areas in the recently adopted boundaries does not only disregard administrative guidelines but also lessens the site's eligibility of being inscribed. In fact, it should have been listed as World Heritage in Danger long ago. This magnificent,

very much outstanding universal heritage doubtlessly belongs on the WHL. However, its *OUV requires major modifications, namely the attributes/Cultural Criteria and boundaries*. These changes can only be made within a renomination and should be prepared alongside a coherent management plan that provides sustainable strategies, addressing the site's challenges. Both documents should respect tangible and intangible cultural expressions, recognising the area as a dynamic urban entity that serves its residents and not as a cluster of monuments or an open-air museum.

On the basis of the author's previous 70-page study (Angl, 2016) and present paper, the recommendations are:

1. Enable access to *all* documents on the WHL (whc.unesco.org/en/list/89/documents) as the website's access level regulation prevents proper scholarly research and signifies a lack of transparency.
2. Clarify the OUV as there is *no* rSOUV, following the ICOMOS evaluation, or *preferably*:
3. List the site as World Heritage in Danger and
4. Consider a renomination with a newly defined OUV after effective protection and strategic management has been developed.
 - 4.1. Encourage studies on and development of effective legal protection mechanisms as the present heritage law and regulations insufficiently protect tangible and intangible values.
 - 4.2. Encourage studies on social dynamics, intangible heritage, heritage use and values and link their results to the OUV.
 - 4.3. Encourage and support training programmes for professionals in the concerned institutions, skilled workers etc.
 - 4.4. Encourage and support awareness programmes and participation schemes for the local community.
 - 4.5. Request monument reuse schemes that benefit the local neighbourhood residents and satisfy basic human needs, e.g. health care, education etc.
 - 4.6. Consider, initiate and/or support broadly scoped development programmes to tackle the cause of problems.

Preserving Historic Cairo as an entity is one thing, managing Historic Cairo under the WHCon is another. Both approaches have to be linked, yet, it is worth a study which of the two is more suitable to act as a role model for future urban conservation. Finally, one should bear in mind to use and benefit from the WHCon's instruments and regulations as supportive tools and to not regard them as a burden.

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Lamu Old Town: Water Scarcity Threatens Preservation and Livelihoods



Mohamed Athman, Save Lamu

Lamu Town, with its origins in the 10th century (i), is the oldest and best preserved Swahili settlement in East Africa. The town lies on an island with the same name and within a nestling of other islands known as the Lamu Archipelago.

Due to availability of water along the catchment area, Lamu is the only remaining Swahili settlement in East Africa, while other settlements such as Bagamoyo in Tanzania, Gede in Malindi and Manda Kingdom disappeared due to the lack of fresh water.

The water catchments of Lamu are the Shela Sand Dunes running through the island. They stretch about 12 km and cover 958 hectares. The dunes rise to about 60 metres above sea level forming a continuous ridge along Lamu Bay. Since the 1950s the sand dunes have been a source of groundwater, leading to their gazettement as a water catchment area in March 2002.

The availability of groundwater in Lamu Island is currently facing challenges from human developments, and especially from population growth, industrialization, and urbanization (ii). The decision by the state to develop two projects in these areas, LAPSET and the Amu Coal power generation plant, will aggravate the situation because the amount of water available in both the mainland and the islands cannot meet the combined demands of these two projects in addition to demands associated with wildlife and human habitation.

The Lamu Culture and Heritage resources

Cultural resources as collective evidence of past activities and accomplishments of the people are evident in Lamu County. The evidence includes pre-historic and historic archaeological sites, historic standing structures and buildings, bridges, cemeteries, and monuments of scientific and cultural value. For the survival of these cultural resources, continuous availability of water is essential. (iii)

The two above mentioned megaprojects will draw significantly upon existing water resources and infrastructure, putting the Swahili people's access to water in jeopardy, and thus their very lives and cultural heritage sites. (iii)

Current Water Availability

Lamu town has a total human population of 22,366 (source: census 2009) which translates into a current water demand of 3.000 m³/day. Other competing water uses are associated with agriculture, commercial activities, and environment. The current water production from available water sources stands at 1.700 m³ - in other words there is already a shortage of 1.300 m³ which leads to water rationing. (iv) At the same time, a total of an extra 700.000 m³ will be needed to meet the demands of the LAPSET and Amu Coals Power Plant projects.

In Lamu we do not have the capacity nor other alternatives to mitigate these competing water demands. This is a big water crises facing the only living Swahili settlement (v):

Fresh water needs of the LAPSET and Amu coal power plant
Projected water demands for consumption by Amu coal power plant is 207.188 m³/day

Item	Demand	Amount
Domestic demands of at least 2000 staff	100 liters / day is	200,000 liters / day
2 No. plant generators	2 pumps @ 4.260 m ³ /hr	2.023,680,000 liters / day
Construction	2 pump @ 1.000 m ³ /hr	48.000,000 liters / day

Projected water demands for consumption by LAPSET infrastructure is 407.188 m³/day

Item	Demand	Amount
Domestic demands of at least 2000 staff	100 liters / day is	200,000 liters/ day
4 No. plant generator	2 pumps @ 4.260 m ³ /hr	4.023.680,000 liters / day
Construction	2 pumps @ 1.000 m ³ /hr	48.000,000 liters / day

Sensitivity of Water Resources to Development Interventions

In a geologically fragile environment like Lamu, any development undertaking must mitigate against aquifer pollution to avoid disease outbreaks (Nkhuwa 2003). Due to the very low

elevations in Lamu in relation to the sea level, sea water intrusion poses problems to water sources such as boreholes. (vi)

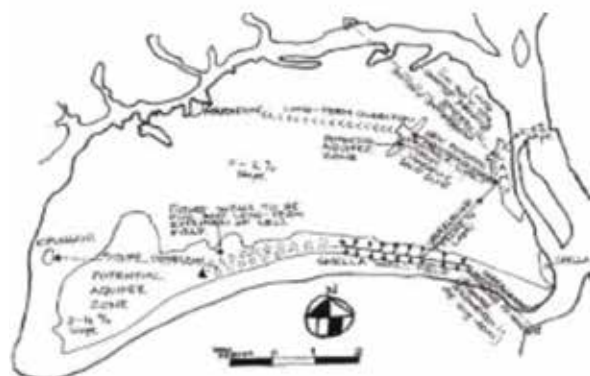
A range of threats, ecological and sociological impacts, is associated with the proposed coal power plant and the LAPSET project. They will have immediate impact on the river biodiversity and water quality. The pollutants may also get transferred through active transport to ecosystems within the sub-basin - the estuaries, lakes, swamps, and creeks. Localized impacts in-

clude loss of species, introduction of invasive species, shifts in estuarine and marine water quality. The dynamics will change the sediment distribution pattern with possible sea-floor erosion from ocean currents affecting ocean biodiversity and habitats.

The accumulation of various sources of pollution is of great concern. Among others pollution sources include pollution from ships, effluent release from factories, and farm chemicals



Above are Wells along the water catchment areas of Lamu

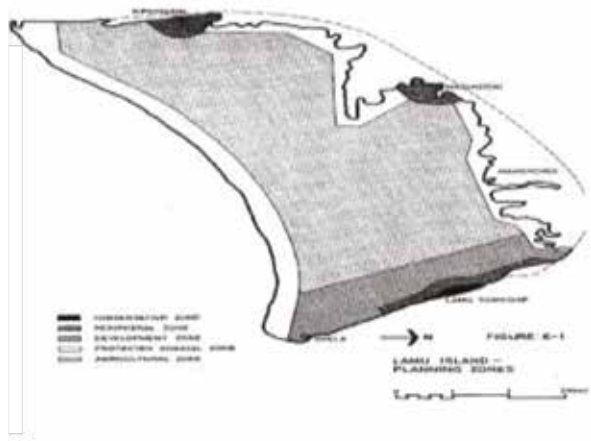


Potential aquifer for alternative site of water harvesting

Source: Kamal Khan 1992



Shella village adjacent to water catchment area of Lamu



Proposed land use plan suggesting the protection of the sand dune that is constructed on by private developers

Source: Ghaidan 19



The water catchment areas of Lamu

Source: Lamu Museum 2000

Fig. 1: Water catchment around Lamu.

runoff. Boreholes and water wells are sensitive to development interventions. And, due to expanding human population, untreated domestic sewage effluent seeping into boreholes poses a major threat to public health.

Hydrology Assessment in the ESIA Report for the Coal Power Plant and LAPSSET

We lack an adequate assessment for the ESIA historical sites in the area of the old town. There has as yet not been an adequate audit to understand the impact of the LAPSSET coal plant infrastructure on water sources which are key in the conservation of all historic monuments. Also, no expert study was done regarding the Lamu water catchment areas; such a study is needed to assess the impacts of these projects on the water aquifers along the sand dunes of Amu Island. (vii)

Furthermore the geological set up of the project site areas has not been studied in advance, and no previous literature is available. This lack of data hinders efforts to collect comprehensive hydrological data. (A report of a hydrology study by Mr. Bernard C. Muhangu, a registered geologist hired by Amu power plant in 2016.)

Both projects are to be located near the sensitive natural resources area of Kwasasi which has surface ocean water, shallow groundwater, and proximity to human settlements. Near a World Heritage site all of these imply risks for human and wildlife habitation.

The proposed projects' experts reports did not fully comply with existing state legislation, that is not with the Constitution of Kenya 2010 and Environmental Management and Coordination Act (EMCA) 1999, and NEMA regulations, nor with international natural resource conventions / treaties.

Suggestions for action

1. Place Lamu on the World Heritage "List of Danger."
2. Through a global initiative, identification and mapping of cultural resources in Lamu County can be established. This will provide a quick reference on their spatial location against emerging developments, and will promote their preservation by ensuring that developers identify and mitigate impacts to cultural resources in project areas before construction activities.
3. Civil society organizations are advocating preventing the coal plant from being built in Lamu. We welcome the formation of a global initiative and approach in stopping this killer project. We are also requesting support in terms of experience, experts, and strategies.
4. The national and county government through the UNESCO World Heritage Committee must undertake a vulnerability analysis and prepare a response plan to avoid water crises to affect Amu old town.
5. Additional global support is needed for the water sector in Lamu to enhance sustainability of quality water provision to protect the heritage sites which contribute to the Outstanding Universal Value.

Conclusion

The Environmental / Social Impact Assessment on the coal power plant project, which has been prepared by experts, is not seriously highlighting the threats of hydrology in relation to the heritage, culture and social fabrics. The report's focus was limited to the project site and did not extend to the adjacent neighborhood, where water, environment, culture and heritage values are threatened.

Cultural resources are finite and non-renewable. Once destroyed, they cannot be returned to their original state. Impacts to resources that are eligible for featuring in the National Register of Historic Places must be mitigated through protection, avoidance of encroachment, and preservation. World Heritage Watch must discuss best ways of how to stop the threats from escalating. The Swahili way of life, historical architecture, and natural environment must be protected. The threats here relate to water, environment, culture and heritage values.

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Concerns for the Potala Palace Historic Ensemble, Lhasa

Kate Saunders, International Campaign for Tibet



On February 17 (2018), a major fire swept through the seventh-century Jokhang Temple in Lhasa, part of the UNESCO World Heritage Potala Palace Historic Ensemble (Fig. 1). The extent of the damage to this building of exceptional and unique architectural and religious significance is still not known, largely due to the lack of concrete information from Chinese authorities, and there are concerns that inappropriate repair work may be undertaken on its historic structure. This development highlights the importance of an evaluation of the status of conservation in Tibet's historic and cultural capital, Lhasa, and raises further urgent questions in advance of the 42nd session of the World Heritage Committee.



Fig. 1: The burning Jokhang Temple, February 17, 2018. }

Photo:anonymus

The current dangers to Lhasa's remaining cultural heritage including the Potala Palace Historic Ensemble are acute due to a number of factors, including a dramatic increase in Chinese domestic tourism and a rapidly expanding infrastructure in which Lhasa is a center of a new network of roads, railways and airports with dual military and civilian use, reflecting the region's strategic significance to the Chinese Communist Party. This context is underlined in the Urban Plan for Lhasa (2007-2020), in which development and tourism are the key priorities, with conservation scarcely mentioned. The June 2008 urban plan, a copy of which has been obtained by the International Campaign for Tibet, states that the planning priority in the short-term is "to practice the leap-forward development" while in the long-term the main objective is a "new Lhasa will be built under harmonious and prosperous socialism." In the section about renovation of the city for tourism, there is no mention of preservation of historic buildings.¹



Fig. 2 and 3: The visual and spiritual integrity of the Potala Palace continues to be disrupted by the phenomena of modern urbanization. Photos: (2) KB, (3) Carlos Mel Bruno

Historic Tibetan architecture in Lhasa's old town and the buildings in the UNESCO World Heritage site buffer zone have not been successfully protected, despite the Chinese authorities' apparent focus on their importance. Only around 50 of Lhasa's historic buildings remain standing today, from 700 in 1948.² In the 1980s and early '90s, most of old Lhasa's traditional buildings were demolished and replaced with three to four storey 'neo-Tibetan' cement houses. Many of these buildings were replaced after the Potala Palace Ensemble was nominated for UNESCO World Heritage status (it was inscribed in 1994) and the historic old town had been approved by the Chinese authorities as a "National Historically and Culturally Famous City" with listed historic buildings in the vicinity of the Jokhang Temple designated as "Priority Protected Sites".³ Just after the nomi-

nation of the Potala Palace for UNESCO status, in early 1995, two-thirds of the historic buildings comprising the historic Tibetan government district of Shol at the foot of the Palace were demolished.



Fig. 4: In 2000, only about 50 traditional houses were left in the center of Lhasa.

or protect Tibetan culture, calling this a “reactionary and narrow nationalistic idea”.⁶

In this political climate, Tibetans are likely to be fearful of speaking out in favor of heritage issues, and it may explain why some early reports from Lhasa on the night of the Jokhang fire denied that the blaze had affected the Jokhang at all, despite video evidence circulating online.

This is also likely to affect local Tibetan involvement in heritage issues in Lhasa. Chinese authorities refer to a number of government departments involved in conservation but omits to mention the involvement of Tibetan experts, artisans or local people in reviewing the plans; an issue that the Committee should raise. Compounding the issue, restrictions on NGOs in China and Tibet make it almost impossible to have independent evaluation of conservation, and highly difficult for UNESCO delegations to gain access to Lhasa.

The Historic Ensemble under question in Lhasa consists of the Potala Palace, winter home of the Dalai Lama since the 7th century until the current Dalai Lama’s escape into exile in 1959, the Jokhang Temple, and the Norbulingka, the Dalai Lama’s former summer palace.⁷ The three buildings were in-

scribed as UNESCO World Heritage in 1994, 2000 and 2001 respectively. In the Urban Plan for Lhasa, the Ensemble area is designated as one of the main areas for “improvement” in the “short-term construction plan”, raising concerns over possible demolitions to create tourist infrastructure.

The surrounding area is also of immense significance; the late expert on Lhasa architecture Andre Alexander wrote: “Lhasa’s prestige and influence as both cradle and center of Tibetan Buddhism gave it a pivotal role within Tibetan civilization.” It is of concern that neither UNESCO World Heritage nor the state party refer to the preservation of the historic buildings of the Barkhor or the buffer zones; clarity is needed on which buildings remain in addition to details on the plans to preserve these buildings.

Recommendations

- It is of urgent importance to protect both the Potala Palace Ensemble and the Barkhor area. We recommend that the UNESCO World Heritage Committee should provide guidelines on protecting the historic Barkhor area and buildings in the buffer zone of the Potala Palace Historic Ensemble based on a clear definition of buffer zones and detailed plan for protection of the few remaining traditional build-

The UNESCO World Heritage ‘brand’ is used as part of the Chinese government’s ambitious plans to boost high-end tourism in Lhasa and beyond, part of China’s strategic and economic objectives in Tibet. In just three days alone during the Tibetan and Chinese New Year period from February 15-18, 2018, 216,400 tourists visited the Tibet Autonomous Region, up 30.7% compared to the same period last year, with tourism revenue reaching \$25 million.⁴ The ‘commodification’ of Tibetan culture – while the authentic culture is being undermined by Chinese policies targeting Tibetan religious identity – was evident during a recent Tourism Expo in Lhasa, which included a ‘re-imagining’ of the deeply symbolic former home of the Dalai Lama, the Potala Palace, in the InterContinental Hotel lobby.⁵ Tibetans are increasingly marginalised by the use of Chinese as the language of tourism in Tibet, providing employment for large numbers of Chinese immigrants in a labor-intensive industry.

The boom in tourism coincides with a trend of intensifying repression and hardline policies targeting Tibetan cultural identity. An official circular distributed in Lhasa and the Tibetan Autonomous Region in February urged the public to report on those suspected of being loyal to the “evil forces” of the Dalai Lama, and in referring to “22 illegal activities” effectively criminalizes those who seek to encourage the use of the Tibetan language



Fig. 5: The original Shasarzur building in inner Lhasa in 1995. Photo: Andre Alexander



Fig. 6: The Shasarzur building replaced by a building in pseudo-Tibetan style, 2013. Photo: Tibet Heritage Fund

ings and temples. Authentic cultural heritage is also a tourism asset, as long as it does not exclude and marginalize local Tibetan people.

- The Committee should press for the answers to questions about the damage from the Jokhang fire of February 17 as a matter of urgency, and seek access for a UNESCO delegation to Lhasa for independent verification of the status of the unique and precious architecture, and its statues and murals, particularly the Jowo Rinpoche statue.⁸



Fig. 7: The ruins of a traditional Tibetan home pictured against the backdrop of new construction. The demolition of traditional Tibetan houses for the construction of socialist building blocks happens on a daily basis.

Image supplied to the International Campaign for Tibet

- The Committee should press for the active engagement of Tibetan craftsman, artisans and experts in their cultural heritage, seeking to revitalize rather than museumize private and public Tibetan spaces.
- The Committee should hold the Chinese authorities to account over its apparent exclusion of Tibetan civil society in conservation issues and its top-down management of Tibetan historic and cultural sites, which are not consistent with UNESCO tenets of cultural diversity and rights. (UNESCO Universal Declaration on Cultural Diversity, 2001: "The defence of cultural diversity is an ethical imperative, inseparable from respect for human dignity. It implies a commitment to human rights and fundamental freedoms, in particular the rights of persons belonging to minorities and those of indigenous peoples.")⁹
- In the Urban Plan for Lhasa (2007-2020), the Ensemble area is designated as one of the main areas for "improvement" in the "short-term construction plan". The Committee should press for answers about what this involves and ensure that preservation of historic buildings are a focus of the plans.

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VI. Monuments and Sites

Stonehenge, Avebury & Associated Sites WHS under Threat of Road Construction



Kate Fielden, Stonehenge Alliance



Fig. 1: Stonehenge is one of the most iconic monuments in the world.

Photo: UNILAD

“Stonehenge, Avebury and Associated Sites” in the county of Wiltshire, was designated a cultural World Heritage Site (WHS) in 1986 for its remarkable remains of the Neolithic and for its large henges with stone settings, and other monuments including avenues and burial mounds as well as settlement remains, the WHS is described in the Statement of Outstanding Universal Value as a “landscape without parallel”. Geophysical surveys in recent years show that there is still an astonishing amount to be learned about the WHS and its archaeology.

The threat to the WHS: proposals for widening the A303 Trunk road past Stonehenge

The A303 strategic road from London and the South East to the South West of England crosses the c. 5.4 km-wide WHS close to the Stones with only two traffic lanes. In December 2014, the Government announced widening of the A303 at Stonehenge, including a 2.9 km bored tunnel. The 4-lane “Expressway” would include c.2 km of new dual carriageway in deep cuttings to twin tunnel portals well within the WHS, and major grade-separated junctions on its boundaries.

There would be irreparable damage to archaeological remains and the interrelationships between monuments and sites in the landscape. There would be adverse impacts on the setting of the WHS and on the settings of key archaeological monuments, such as the ancient Avenue and groups of burial mounds. A massive flyover could damage the integrity of the newly-discovered Mesolithic site of Blick Mead at Amesbury. Drivers would lose the valued free view of the Stones from the road and most people would have to pay to see Stonehenge in future.

At the time of writing (March 2018), Highways England is consulting on the “preferred route” for the Expressway, prior to making a formal application for construction works later this year. The scheme is in direct conflict with advice given to the UK Government by UNESCO’s World Heritage Committee in July 2017 to explore options that would not damage the WHS.

The A303 Expressway project: a troubled history

In 1998 the Government planned to widen the A303, including a 2km cut-and-fill tunnel, to improve the setting of the henge

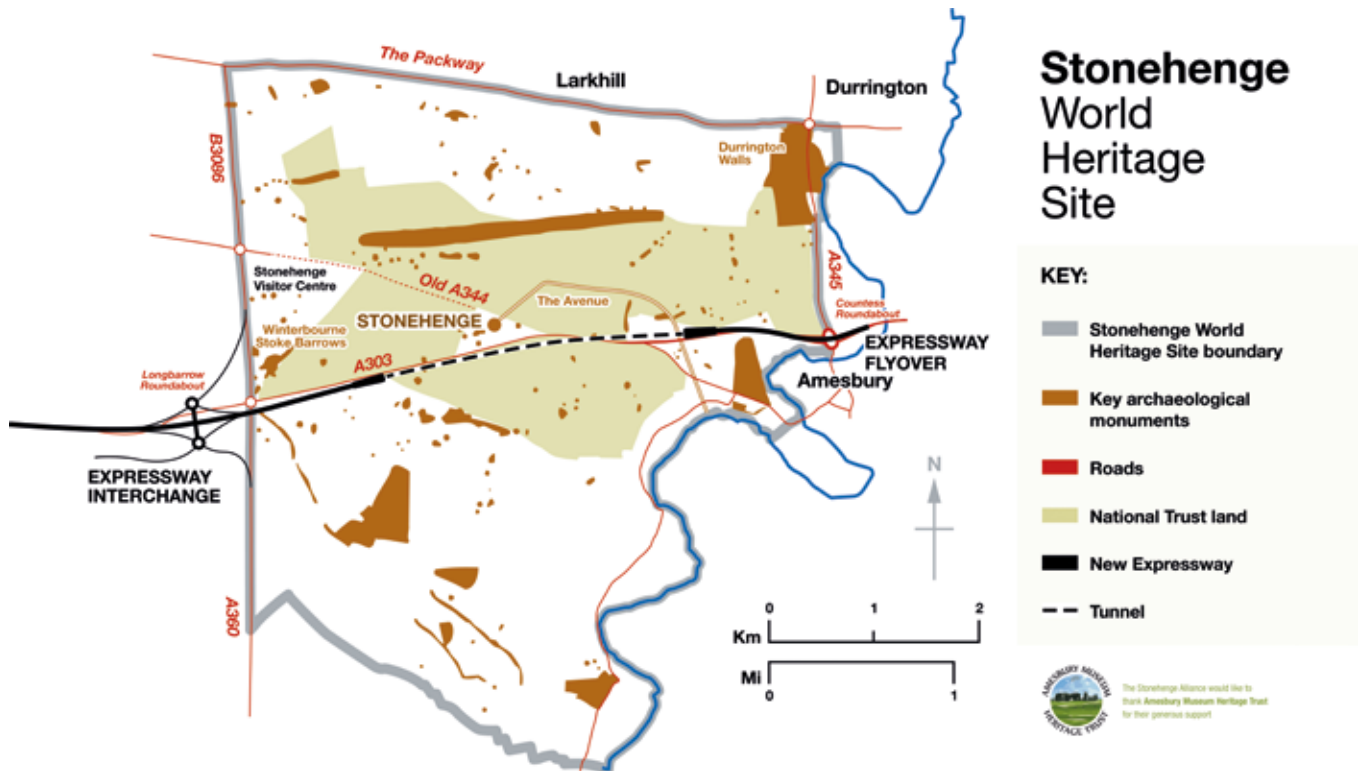


Fig. 2: Map of Stonehenge WHS showing the proposed new Expressway, tunnel and junctions.

Map: The Stonehenge Alliance

monument at the centre of the WHS. The World Heritage Bureau was wrongly informed that no damage to archaeology would result. Objectors' letters to Government Ministers and the World Heritage Centre apparently fell on deaf ears.

The proposed scheme, subsequently modified to a 2.1km bored tunnel, was subject of a Public Inquiry in 2004. Government obligations under the World Heritage Convention, planning policy safeguards and agreed protective policies in the first Stonehenge WHS Management Plan (2000) were disregarded. The road scheme was supported by the UK National Commission for UNESCO. English Heritage, the Government's heritage watchdog now known as Historic England, asserted that Outstanding Universal Value (OUV) related only to certain legal-

ly-protected monuments, not the WHS property itself. Despite wide objections from archaeological and environmental bodies, including ICOMOS-UK, the project was recommended for approval by the Inquiry Inspector. The poorly-informed World Heritage Committee expressed disappointment when the project was abandoned in 2007 owing to escalating costs.

The present situation

The road scheme now proposed is based on Government demands for "feasibility, deliverability and value for money" rather than on protection of the WHS and its setting. The tunnel is seen as a contribution towards heritage considerations within a scheme driven by road transport and economic development



Fig. 3: Stonehenge from the A303.

Photo: spirefm

aims. It is claimed that improved journey times would stimulate economic and housing growth in the South West of England, though recent research indicates road widening rarely achieves these outcomes. [1]

The A303 project is welcomed by many people living nearby who are affected by traffic congestion and 'rat-running' through villages at weekends and holiday periods. Their voices are used to justify a scheme which is mainly being consulted upon locally: Only one consultation venue was held outside Wiltshire: for an afternoon in London. Local concerns are reasonable but could have been dealt with long ago with measures to stop rat-running and ease traffic flow.



Fig. 4: Proposed approach to west tunnel portals. Note the lacking indication of heavy traffic, signage and lighting.

Image: Highways England

Historic England (formerly English Heritage) and the newly-formed English Heritage Trust both come under Government regulation or influence and inevitably support the Government's road plans. English Heritage Trust, manager of the Stonehenge visitor centre, and the National Trust, which owns land surrounding the Stones, also support the project for the benefits of the tunnel to the central part of the WHS, along with enhanced income from tourism. The Local Planning Authority, Wiltshire Council, is largely compliant, despite its strong protective policy for the WHS and its setting. The support of these powerful bodies allows the Government and Highways England to proceed with impunity. Once more the safeguards are being ignored at a time when Government policy and advice on protection of WHSs and their settings is stronger than ever. The situation is not helped by misleading press and social media statements by promoters of the scheme which give the impression to the public that the scheme would protect the WHS.

The role of civil society in raising awareness

The Stonehenge Alliance,[2] a group of five national non-governmental organisations and individuals, was formed in 2001

to campaign against the earlier A303 widening project. Strong opposition at that time also came from others, including the Avebury Civic Society, concerned about the implications of the scheme for the other half of the WHS. Many objectors, including the Alliance, brought specialist evidence to the Public Inquiry in 2004. Since then, Alliance supporter-organisations have taken part in the production of the WHS Management Plan and Wiltshire Council's Core Strategy (both published in 2015), ensuring a sound local framework of planning protection for the WHS.

The Alliance moved back into action in 2014 to oppose the present scheme. Over the past three years we have lobbied the authorities, and kept the World Heritage Centre informed. We have distributed thousands of leaflets by post and at events where our banners are displayed.



Fig. 5: Stonehenge, autumn equinox 2016.

Photo: Kate Fielden

This time around, our campaign has been transformed by the daily use of social media, managed by Kate Freeman, our Friends of the Earth South West representative. We have built a strong community of individual supporters through our national and international petitions available in a number of languages, with over 32,000 signatures of people of all ages and walks of life and from more than 40 countries. Our website is a point of reference with news, videos, articles, and copies of our correspondence.

Pro forma responses to consultations on our website allow a wider community, who would not otherwise know about threat to the WHS, to voice its opinions. Thus, an informal consultation on scheme proposals last January raised some 9,000 responses, over half of which were made via our website. Of these 9,000 responses, some 77% were objections to the scheme but they were set aside by Highways England, since they were not helpful in developing the road scheme.

Although we continue to receive dismissive answers to our letters of concern to UK Government Ministers and Highways England, our efforts have proved effective.

- In August 2015, the World Heritage Centre reported on its website receipt of numerous messages of concern and that the A303 project is being monitored.
- Alliance representatives were invited to meet the WHC/ICOMOS Advisory Mission to Stonehenge in October 2015, allowing us to raise concerns directly and send more information to the WH Centre after our meeting.
- Unfortunately, the UK Government took the Mission's carefully-worded advice in its 2016 Report as support for the 2.9km tunnel.
- The Alliance was not formally invited to meet the second Advisory Mission in January 2017, but sent follow-up information.
- Our representatives spoke at the World Heritage Watch Forum in June 2017 and stayed on as observers at the meeting of the World Heritage Committee in June–July 2017.
- A report to the 2017 WH Committee meeting based on the advice of a second Advisory Mission earlier that year, gave rise to the Committee's Decision which urged the UK Government to explore an A303 bypass or longer tunnel options that did not involve dual carriageway cuttings within the WHS.[3] The State Party has ignored this advice.
- WHS Steering Committees charged with implementation of the WHS Management Plan are, unfortunately, crowded with representatives of A303 scheme promoters and supporters. It appears there has been no objective debate of the A303 scheme by these Committees. Some individual Avebury Steering Committee members have expressed their disquiet to the Department for Transport (copied to the World Heritage Centre).
- We met the March 2018 Advisory Mission to Stonehenge and outlined our concerns about the A303 scheme now under consultation. We underlined the irreversible adverse impacts of the scheme on the WHS, about which there is global, not simply local, concern; and asked them to endorse previous UNESCO advice to the Government.

The UK Government's State of Conservation Report on the WHS to UNESCO in March 2017 inferred that the road scheme was progressing satisfactorily. It also showed confusion about

the concept of OUV and what needs to be protected in a WHS. It appears that ICOMOS' Guidance on HIA for Cultural WH Properties (2011) has been used to argue that the 2.9km tunnel would bring overall benefit to the WHS. In writing to the WH Centre, and at meetings with Advisory Missions, the Stonehenge Alliance gave particular emphasis to problems concerning the proper interpretation of OUV and the misunderstandings that have arisen in respect of ICOMOS' Guidance on Heritage Impact Assessment. There is a widespread tendency in current statements and guidance to concentrate on "protection of OUV" when the WH Convention actually demands protection of the designated WH property.

What happens next?

We very much hope that the third (2018) Advisory Mission will reiterate the advice of the second Advisory Mission and World Heritage Committee in 2017.

Should the UK Government continue to press ahead with the A303 'preferred route', we hope that the Mission will be minded to recommend to the 2018 meeting of the WH Committee that the WHS should be placed on the List of WH in Danger. Such an action might help to achieve a better outcome for the WHS and its proper enjoyment by future generations.

It would also be helpful if the critically important issue of OUV were to be clarified by UNESCO and ICOMOS as soon as possible.

In the opinion of the Stonehenge Alliance, the current problem with the A303 crossing the WHS is not the road itself but the traffic which needs to be dealt with sensibly. If road widening is insisted upon, a longer tunnel or an alternative route should be considered.

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Assessment of the Archaeological Site of Carthage

Oumaïma Gannouni, BTU Cottbus-Senftenberg

Tunisia's rich heritage - a legacy of its tolerance and openness - is in urgent need of safeguarding, innovative presentation and proper integration in the tourism sector and in the national educational curricula. As per Article 4 under Section II of the 1972 World Heritage Convention which the State Party signed on the 10 of March 1975, Tunisia is responsible to "ensure the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage". If there is no detailed assessment of the damages currently visible

in the heritage sites inscribed on the World Heritage List, the property will continue to be threatened. Any management plan needs to make an objective assessment of the 13 component parts of the property and can only have a real impact if all the bodies responsible for the heritage inscribed under the World Heritage List work in close and continuous cooperation.

The reasons for the site's inscription, and its universal and local significance, need to be fully grasped by the responsible bodies. Similarly, they need to be highlighted at all of the component parts of the ensemble and explained to the local population as well as to the visitors.

In the case of the Carthage ensemble inscribed to the World Heritage List in 1979 under criteria (ii), (iii) and (vi), much urgent work needs to take place in the near future, for fear of further rapid organic and man-made degradation to the sites. These recommendations reflect a three-years-long communication and close site assessment and supervision with residents and local NGOs along with consultation with all relevant governmental bodies working directly with the Archaeological Site of Carthage.

The communication and clarity of tasks and missions between the two main bodies responsible for the Archaeological Site of Carthage is crucial for the successful management of the property. It is advisable that the National Heritage Institute (INP) and the Agency of Heritage Enhancement and Cultural Promotion (AMVPPC) establish a joint task force or physical space where regular exchanges can be made.



Fig. 1: The area of the 13 components of the inscribed World Heritage property, laid over a satellite image, reveals that parts of the site have been encroached and built over.
Map: Martin Lenk

The AMVPPC needs to develop capacity in tourism and work closer with the Ministry of Tourism. These two governmental bodies need to have more cooperation which can allow for controlled site activities rather than intermittent commercial events disturbing the integrity of the property. The capacity to generate monetary gain is not fully utilized with the main earnings coming from entrance fees to some of the sites in the ensemble. This should be connected to the provision of parking facilities and be a main concern for the Agency at the moment.

Security on the sites needs to be reinforced. The security guards must assert their presence on the visitors and be physically able to patrol the sites, meaning an age limit must be set for retirement. The workers and especially the cleaners need to follow a code appropriate to the property and be trained in damage prevention. Instructions need to be given to tour guides and their groups regarding the prohibitions of touching or climbing certain fragile structures. A lot of the structures are in urgent need of conservation. Signage and fencing are lacking in many places while the existing signs in the ensemble need to be replaced and updated.

As far as the State of Conservation report is concerned, we request that the State Party spends more time and resources in the preparation process while consulting all stakeholders. The State Party is requested to submit a well-studied and reliable assessment of the sites in question. The content, body and format of the report must reflect a collective effort and eventually be available to the working bodies overseeing the property. The State Party's representatives to the World Heritage Committee and the UNESCO field office in Tunis also need to be involved in this process. The author of the report must be noted and an official seal accompany the report to be able to trace its source. Finding the source of the author of the 2015 State Party's State of Conservation report was a challenge.

In this report, the State Party names two organizations with whom it is engaged. The first was a scuba diving association which initiated a cleaning day event around the Punic Ports. The other, and the only heritage-related, association mentioned was the "Les Amis de Carthage", and where the State Party noted that it is composed of retired INP members and residents of the area. While these engagements are very important they seem to be very modest at this moment. Full engagement, transparency and the establishing of suitable channels of communication with other local active associations and an extended network of residents neighboring the sites is highly recommended.

Points of reference to the 2015 State Party's State of Conservation report:

- *La colline de Byrsa* needs regular cleaning missions and supervision of the activities taking place in the vicinity of the site.

- *L'amphitheatre* is used as a venue for a summer festival. The cement work on the site is not up to standards. The status and importance of the site need to be explained to the visitors so they do not cause further damage.
- *Ibn Chabbat et le Quartier Magon* need regular cleaning missions. The nearby sites that have been excavated by previous missions and closed previously for political reasons need to be accounted for today.
- *Le port Punique* is still used by boats that are not meant to be in the area. The port needs regular cleaning and supervision of the activities taking place in the vicinity. A local guard is present but protects the boats rather than the site. The embankments of the small island are visibly deteriorating and need urgent conservation.
- *Les fouilles archéologiques*, especially in Byrsa, showcase the urgent need for a clear buffer zone due to the proximity of findings on privately owned land. The lack of such zoning prevents the verification of the actual size of the site and its value. Special attention needs to be given to fenced areas in Byrsa and Salamambo, as this usually means that construction is under way hiding archaeological findings.

Local legislation needs to be urgently reviewed to provide archaeologists enough time to process their work on privately owned land. Legislation also needs to be very clear on establishing the "value" of findings which determines whether a site remains the property of its private owners or transferred to the government. Building plans of affluent individuals on plots which contain archaeological findings need to be challenged legally. For this the INP needs more judicial backing and power.

The two main bodies responsible for the management of the site do not lack the personnel nor the financing needed for the successful implementation of their mission. The management of the site is jeopardized by unclear job descriptions of the employees, the lack of communication between the relevant heritage bodies and an inclusive and shared annual management plan. The 2015 State of Conservation report, previously unknown to most of the persons responsible for the site, could be the key to its successful management. If the report is drafted with the cooperation of all those directly responsible it could highlight the actual issues being confronted, which can be dealt with in the following year's management plan.

The current drafting of the protection plan for the site (PPMV) is a great first step that the State Party is taking, and the hope is that its implementation takes into account the recommendations made here. It is important to highlight that appointments in the Archaeological Site of Carthage made by the Ministry of Culture such as the position of the Conservator of Carthage, need to be made in consultation with and agreement of the INP and the AMVPPC. This can facilitate cooperation and the implementation of projects between all stakeholders.

Photographic Documentation

All photos by Oumaima Gannouni



Fig. 2: Entrance of the Antonine Baths



Fig. 3: Antonine Baths



Fig. 4: Antonine Baths



Fig. 5: Roman Villas



Fig. 6: Roman Villas



Fig. 7: Roman Circus

Ancient Thebes with its Necropolis and Luxor City: Threats, Impacts and Possible Solutions

Eman Shokry Hesham, BTU Cottbus-Senftenberg

The World Heritage Site *Ancient Thebes with its Necropolis* is located in the modern city of Luxor on the east bank of the River Nile, Egypt. This part of the WHS contains Luxor and Karnak Temples and the Processional Way that connects both (also known as the Avenue of the Sphinx). These monuments were built in a long range of time starting from the Ancient Egyptian Kingdoms until the Ptolemaic and Early Christian Periods. Unlike *Historic Cairo* which was inscribed as a “City”, *Ancient Thebes with its Necropolis* was inscribed (also in 1979) as an “Archaeological Zone”. This status has affected Luxor City on many levels. Many national and international master, structural and development plans have been made since 1979 which have dealt with Luxor – with its heritage site in the center of attention – using a tourism-based approach which has formed the management strategy, hence, impacting both the heritage property and the community lifestyle.

The World Heritage property in Luxor City

The World Heritage (WH) property in Luxor consists of three components which form the sacred zone of the Ancient Egyptian Gods (Amun, Khonso, and Mut). The three components are Luxor and Karnak temples and the Processional Way. However, the adopted core zone or the boundary of the WH property of the *Ancient Thebes with its Necropolis* (Fig. 1) on the east bank surrounds the Luxor and Karnak temples in two separated zones. Despite that the WHS was inscribed in 1979, the then partially-unearthed ancient Processional Way that connected both zones has never been a part of the designated WH property. Perhaps that was due to its condition, being under layers of more recent structures and debris, and consequently under continuous excavations.

Recently, as part of the execution of the *Comprehensive Development Plan for the City of Luxor* (CDCL), most parts of the Processional Way have been unearthed due to several evacuations and demolishing the modern residential and commercial structures that occupied its surface and used to form parts of the modern city. Hence, the site management must pay the same attention to the Processional Way, and it must be treated with the same high priority of protection, as the Karnak complex and Luxor Temple. The management plan as well must set immediate conservation and protection mechanisms for the Pro-



Fig. 1: Map of Luxor City with Core and Buffer Zones of the WHS.

Map: Hesham, adapted from Egyptian Antiquities Information System 2008, Egyptian Survey Authority 2012

cessional Way, especially for the newly unearthed parts, taking into account that it is now an inseparable part of the WH Property even if it is not recognized officially as such. On the other hand, the urban and social networks of the city have been seriously harmed after the unearthing of the Processional Way.

Being almost 2.7 kilometers long (in total) in the city center, the Processional Way - which is several meters below the level of the city - has caused an archaeological ditch in the heart of Luxor and has divided it to an eastern and western part (Fig. 2 and 3), therefore has affected the integrity of the city and its urban and social networks. To solve the resulting mobility problem, two bridges for vehicles have been constructed over the ancient Processional Way; the necessary procedure that adds to the complexity of the situation.



Fig. 2: Airport Bridge (Looking West), Constructed Over the Archaeological Site of the Processional Way. Photo: Hesham 2015



Fig. 3: Mathan Bridge (Looking North Towards Karnak Temples), Constructed Over the Archaeological Site. In the Foreground to the West are Remains of Roman Wine Installations. Photo: Hesham 2017

The statement of OUV and the management plan

There is yet neither an available (retrospective) statement of its Outstanding Universal Value nor an official unified management plan. While Egypt, as a State Party, indicated in its Periodic Report in 2000 Cycle 1 Section II that there was a "functional management plan [existing]", and there is an "annual plan prepared by the Supreme Council of Antiquities", there is a continuous demand by the World Heritage Committee for a management plan according to their Decisions 37 COM 7B.48 in 2013, 39 COM 7B.49 in 2015 and 41 COM 7B.76 in 2017. The lack of a Statement of OUV and a comprehensive management plan were noted twice in the WHC's latest Decision, 41 COM 7B.76.

Civil society activities and empowerment obstacles

Among the 132 registered NGO's in Luxor, there is none that is concerned about its cultural heritage affairs. 30% of them concern charity, an equal percentage of 20% are for religious, community development and typological societies' aspects, while the remaining 10% concern other causes (luxor.gov.eg 2018). The farmers, who make today about 20% of the labor force in Luxor, are represented by six NGOs, and tourist guides are represented by three. On the one hand, these statistics show that there is no real representation of the community sectors of Luxor by collective civic activities (only 20%). On the other hand, with regard to the *Strategic Action Plan for the Implementation of the World Heritage Convention 2012–2022*, this shows the lack of a sense of collective responsibility, ownership, and attachment between the local community and their built heritage. It also demonstrates the lack of awareness about its importance, its value, its actual involvement in their daily livelihood, and likewise, lack of public services and adequate infrastructure.

Environmental concerns

Luxor city undergoes a chronic threat of the rising water table which affects directly the foundations of the WH property. Luxor also suffers the lack of adequate, effective and independent waste management system. According to 2010 statistics, Luxor City¹ has had neither a dumpsite, a landfill for solid waste, nor a waste recycling factory.² Fig. 4 manifests both this huge problem of the lack of adequate waste management and lack of awareness. The scheduled development projects in the CDCL, albeit not completely executed, need to be revisited in terms of their impact to realize responsible tourism and also a sustainable lifestyle for the local community.



Fig. 4: The Processional Way is used as a garbage dump by parts of the local population (view to the north). Photo Hesham 2012

1 Luxor city is 44.13 Km² in size and its population is 210,936 inhabitants in the year 2017.

2 AlBayadyia, south of Luxor, accommodates one dumpsite, one landfill for solid waste and one waste recycling factory (according to Luxor Governorate Information Center 2010 Statistics).

Recommendations

- The WH Committee is highly recommended to request the State Party (MSA) to suggest the necessary boundary modifications in order to include the Processional Way within the boundaries of the WH property *Ancient Thebes with its Necropolis*, and use this opportunity to draft a realistic OUV.
- The immediate activation of the national Law No.144 of the Year 2006 *On the Regulation of the Demolition of Unthreatened Buildings and Constructions and the Conservation of the Architectural Heritage* to protect the remaining recent built heritage of Luxor City. According to Article 2, It is prohibited to demolish buildings of *outstanding architectural style* without a permit issued by the Egyptian Prime Minister. A permanent committee of nine members should be formed by the governor of Luxor, which should consist of two representatives from ministries of Culture and Housing, Infrastructure and Urban Development, two representatives from the Luxor governorate and five members from a teaching university staff in the related fields. While the law is a key element to hold the continuous destruction of buildings that don't necessarily belong to the ancient Egyptian periods to be protected, and crucial to help creating an official inventory for the social and architectural values of Luxor, the permanent committee (that has not yet been formed) needs to have representatives also from the civil society actors; the aspect unfortunately not supported by this law.
- Nevertheless, it is vital that this committee has to be provided with the right to access all relevant official information and documents (including current and previous strategies and planning documents). By initiating the halting of the demolition of buildings until the inventory is made, this action would highly contribute to the WHC note (6) in its latest Decision 41 COM 7B.76 and would fight the modernization pressure on the site and force respect of all layers of the built heritage of Luxor. The *recent heritage* that the local community can relate to is as important and definitely deserves protection.
- It is worth considering that this permanent committee according to this law could be also an important potential entity that represents the "experts from the legal-administrative framework", with which the WHC and their further missions would work together on evaluation, monitoring and reporting on the WHS. Hence, with emphasis on involving civil society actors, they would have the opportunity to "comment on reports and decisions before being adopted".
- Most of the CDCL tourist projects have been on halt since 2011, due to political and financial issues, which is considered an opportunity to re-evaluate the CDCL and meanwhile take practical steps to activate the Law No.144 of the Year 2006.
- A Heritage Impact Assessment (HIA) as recommended by WHC Decision 41 COM 7B.76 is another key tool to evaluate potential threats of new development projects in heritage sites in Egypt, and to find possible mitigation strategies for their different negative impacts. There is an urgent need to start building a new capable generation at the MSA and local teams in different regions of Egypt. One of the proposed earliest mitigation strategies would be permitting a minimum intervention within the WH property of Luxor (including the Processional Way), as indicated by the WHC Decision 41 COM 7B.76.
- Building the capacity of site management staff (a team from Luxor governorate and from the MSA office in Luxor), whom should be trained about HIA too, is a vital tool for an immediate and continuous inspection. It must be a high priority to study the impact of vehicle traffic over the unearthed Processional Way in terms of vibration and pollution induced by the construction of the bridges and their use that might irreversibly affect an important component of this WHS.
- The design and setting of the bridges crossing the Processional Way must be revised, for minimum visual obstruction and least usage of modern metal features.
- Strict and immediate protection measures must be executed and applied on the Processional Way (perhaps as the first action to be achieved by the management plan that must be made). For a genuine long-term protection, the local community must be involved. Continuous awareness campaigns must be organized, and families and individuals who live in close proximity to the heritage property should be the first priority.
- As part of their rights, civil society in Luxor must be supported to engage more in their heritage affairs, by earnestly encouraging them in the campaigns to start creating new NGOs, or involve existing ones, that concerns their heritage property. Involving them in taking responsibility will enable them to perform their right to participate in managing the site (after continuous local training and capacity-building). This may help creating more job opportunities and a sense of benefit-sharing.

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Makli Monuments Merit More Attention Than they Receive

Zulfiqar Ali Kalhoro, Pakistan Institute of Development Economics



Fig. 1: Panorama of the necropolis on Makli Hill.

Photo: https://en.wikipedia.org/wiki/Makli_Necropolis

Makli is one of the largest necropolises spreading over 12 square kilometers containing the tombs and graves of kings, princesses, queens, poets, religious scholars and others. The Samma (1351–1524) were the first rulers to erect monuments on Makli Hill, followed by Arghuns (1524–1555), Tarkhans (1555–1592) and Kalhoras (1737–1773) (Dani 1982). The most splendid structure belongs to Jam Nizamuddin alias Jam Nindo (Fig.2). The intricate carvings on the façade and mihrab of the tomb leave the onlookers mulling over the mind-boggling designs that the Samma artisan crafted. The Samma cluster also includes the earliest canopies at the Makli thus providing prototypes to later period canopies erected by the Tarkans and Mughals.

Due to its cultural, archaeological and historical importance, UNESCO listed the Makli necropolis as a World Heritage site in 1981. The Culture, Tourism and Antiquities Department of the Government of Sindh is doing a good job by responding to recommendations by UNESCO which it gave in its 41th session at Krakow, Poland.

The State Party has tried to address some of the issues. Responding to the recommendations, a few measures have been taken by the State Party:

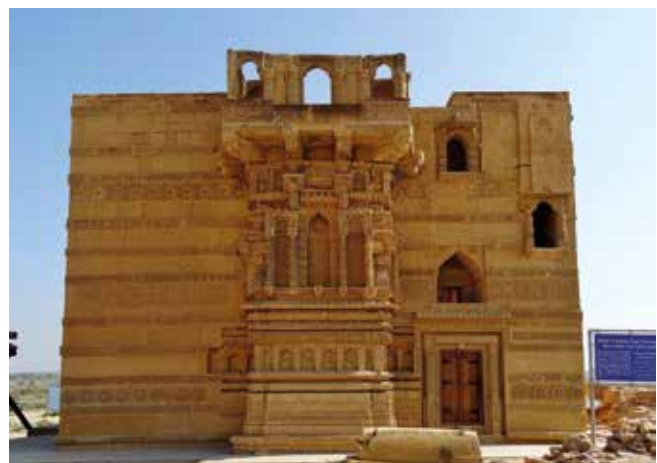


Fig. 2: The tomb of Jam Nizamuddin.

Photo: Zulfiqar Ali Kalhoro

1. There is a total of 20 site attendants who take care of the monuments but they have not yet hired security guards to keep watch and prevent people from vandalizing the monuments. The proper hiring of security guards will stop the incidence of stealing valuable stone slabs and other architectural elements of the monuments from Makli.
2. Three weather stations and many crack monitors have been installed in different tombs.

3. The State Party has succeeded in removing litter, graffiti and vegetation from the property to some extent. Dustbins have been kept at most of the places.
4. There are a quite few monuments especially near the Shah Murad shrine and Isa Langoti Madrassah where vegetation has not been properly removed. Cactus has grown everywhere near the canopies. Although, these lie outside of buffer zone they should immediately be removed since they invade the property.
5. Entries of all heavy and light vehicles have been stopped by the State Party. Although they face difficulty sometimes but they have implemented it in true letter and spirit.
6. One of the positive steps that has been taken by the State Party is the introduction of the Makli shuttle service for tourists and visitors. This will save monuments from toxic emissions.
7. Efforts for stabilisation of some of the monuments are underway. The Culture Department has allowed some NGOs to protect and stabilize some Monuments.

Despite of these positive steps and responding to recommendations by the UNESCO World Heritage Committee, there is still lot to be done since not all the decisions of the Committee have been implemented.

1. The most difficult thing for the State Party is the encroachment which the State Party and the Culture Department of the Government of Sindh are working hard to remove. But on the ground it seems a herculean task to remove the encroachment. The encroachers are the voters of the present government of Pakistan Peoples Party. The Minister for Culture is sincerely trying to convince the local elites to help in this regard. Unfortunately there is lack of coordination among various government departments who do not facilitate the State Party to remove the encroachment; rather they add misery to what they are doing. Many houses have been constructed on Makli Hill. Those who have constructed houses on the premises of the Makli necropolis have been provided all the amenities by a local MPA. A road has been constructed without getting NOC (Non Objection Certificate) from the Administrator officer of Makli Graveyard or the Antiquities Department of Sindh under which now the graveyard of Makli falls. Ironically, not only road but also electricity and water have been provided to people who have illegally occupied Makli land. How is it now possible to relocate or shift them when they are having all the amenities provided by the local MPA belonging to the State Party (Sindh Government here) whose only interest is to get votes at the time of election, to the detriment of the preservation and protection of Makli monuments? This seems impossible right now, and it may take longer time than expected to shift the residential area from the Makli graveyard.
2. A four-kilometer long boundary wall was also stopped as the State Party had to face resistance from the local community and local elites who have occupied Makli land. The local Shirazi family is creating problems and influencing the State Party not to complete the boundary wall - it would appear that political parties listen more to local elites who are also their voters. They don't want to lose their votebank, and this is one of the reasons the boundary wall has been stopped.
3. Based on my frequent visits to the Makli Graveyard, I observe that during the festivals at some shrines more damage and vandalism are discernible. The State Party should chalk out a strategy to either stop all festivals or coordinate with the organizers of these festivals to minimize the risk by properly handling the situation during the time of festivals as devotees and disciples of saints of the Makli monuments damage more than anybody else.
4. Entries of the beggars and entertainers should also be banned as they sometimes vandalize and place their belongings and other things inside the tomb or tomb wall enclosures.
5. The majority of stone-carved platforms are in crumbling condition. There were a total of 402 such stone platforms out of which only 20-25 have withstood the vagaries of weather. All these need to be preserved with utmost urgency.
6. The gem of Samma architecture is the tomb of Jam Nizamuddin, every space of the structure was meticulously carved. The impressive façade of Jam Nizamuddin's tomb makes it one of the best architectural marvels in the tomb architecture of the Islamic world. The triple mihrab assemblage with ornately carved blocks makes it the finest example of Sindhi architecture (Dani 1982; Lari and Lari 1997). The tomb of Jam Nizamuddin was a source of inspiration in terms of designs and calligraphy for tombs on Makli built in later periods. The World Heritage Committee urged in its decision the State Party to continue the stabilization of all elements in danger of collapse, in order of priority, particularly the Jamia Majid and the Jam Nizamuddin Mausoleum. This request and concern by the Committee unfortunately has not been yet addressed. The State party has not yet given a task to any organization to stabilize both monuments. The EFT (Fund Trust for Preservation of the Heritage of Sindh) offered its services to preserve the tombs of Jam Tamachi and Jam Nizamuddin. At first the Culture Department, Government of Sindh agreed to the proposal by EFT but later showed no interest.
7. The stone canopy of Badi uz Zaman (1602 AD) is in a dire state of preservation and needs to be restored immediately. Cracks have developed in the dome of canopy (Fig. 3) A long time ago, brick wall supports were constructed to stabilize the canopy but it appears that the canopy will collapse soon if it is not protected in time.
8. Two of the earliest hermitages of Shaikh Hamad Jamali and Shaikh Isa Langoti (which lies out of Buffer zone) are in bad state of preservation. The State Party has not yet thought of preserving or giving it to other organization to preserve them.

9. The collapsed canopy near the Madrassah of Shaikh Hamad Jamali should be restored as all the architectural elements of the canopy are dispersed on the site (Fig. 4).



Fig. 3: The canopy of Badi uz Zaman.

Photo: Zulfiqar Ali Kalhoro



Fig. 4: Collapsed canopy near the Madrassah of Shaikh Hammad Jamali.

Photo: Zulfiqar Ali Kalhoro

10. New burials still continue at Makli graveyard and no land for new burial has been reserved yet by the State Party. The Culture Department, Government of Sindh could not stop the new burials at Makli graveyard.
11. All the Government buildings should immediately be shifted from Makli Hill. The District Health Office and the agricultural godown which have been constructed on Makli Hill should be shifted. Moreover, efforts should be made by the Culture Department, Government of Sindh to convince the Agriculture Department to purchase the godown and

convert it into heritage warehouse where all the removed or fallen-off ceramics and other valuable architectural elements should be stored as at present all the ceramics and other artifacts of Makli are kept in the building of the Makli Museum.

12. What is not recommended in the UNESCO Document are the cluster of monuments on the southern ridge of Makli Hill which is also dotted with historic monuments of the Tarkhan (1555-1592), Mughal (1592-1637) and Kalhora periods (1737-1783). Although they lie outside the buffer zone, they are all equally important historic monuments. Some of the dignitaries of the Tarkhan, Mughal and Kalhora periods are buried in the southern part of Makli Hill. This part of Makli should also be protected by erecting a boundary wall. Unfortunately, this southern part is most vulnerable and people are eating up the cultural landscape by building houses and other structures.
13. It is suggested that more private-public partnerships should be encouraged as this is useful when the government lacks resources and professionals in the field of conservation. Two of these organizations are the Heritage Foundation that conserved Sultan Ibrahim's tomb and Jan Baba Tarkhan's tomb, and the EFT which would conserve the tomb of Diwan Shurfa Khan and canopy of Jam Tamachi. It is recommended that one should also involve other organizations to help the State Party in conservation of Makli monuments. The Aga Khan Foundation should also be involved as it has successfully been conserving the monuments in Hunza, Skardu and Lahore.

The best examples by the Aga Khan Foundation are the Ganesh Khun, Altit and Baltit Forts, and the wooden mosques of Shigar, Khaplu, Nagar etc. The tombs of Isa Khan Tarkhan II and some brick built tombs of Samma should be given to the Aga Khan Foundation for restoration and conservation. The majority of the stone canopies except those in the Samma Cluster are also in deplorable condition. These can be handed over to the Endowment Fund Trust for preservation of Heritage of Sindh to preserve them as the Trust has experience of conserving a few of such stone canopies in other districts of Sindh.

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Civil Society Striving Relentlessly to Safeguard the Fort and Shalimar Gardens, Lahore



Imrana Tiwana, Lahore Conservation Society

To uphold the ideals of the Convention, it is important to put the record straight and state the 'facts as they stand' pertaining to the Orange Train Metro Project at Shalimar Gardens and the newly-added kitchen structure for a fine dining restaurant at the Royal Kitchens, Lahore Fort.

Civil society has relentlessly strived to conserve, preserve and protect this invaluable WHS which belongs to 'all peoples of the world' through a public interest litigation questioning the Orange Metro Line Project which is in violation of the law and poses an irreversible threat to the Outstanding Universal Value OUV of the World Heritage Site.

This report will focus on UNESCO's directions, given in the World Heritage Committee's 40th and 41st sessions regarding this World Heritage Site. At its 40th session in Istanbul, "the World Heritage Committee requested the State Party to invite a joint UNESCO/ICOMOS Reactive Monitoring mission to the property, to examine the Orange Line Metro project¹". Despite this, the Pakistan State Party repeatedly denied visa access, the WHC Committee then directed the following: "It is recommended that the Committee consider the inscription of the property on the List of World Heritage in Danger, should the current project continue and the remaining water tanks of the hydraulic works be damaged²."



Fig. 1: Shalimar wall to the left – track on right within 200 foot buffer zone.
Photo: Altumush Saeed - March 2018

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WHC 41st Session in Krakow

On its 41st session held in Poland in July 2017, the World Heritage Committee stated: "Taking into consideration (i) the impacts of the ongoing construction work on the setting and integrity of the Gardens;" and recommended the following: "It is recommended that the Committee immediately inscribe the property on the List of World Heritage in Danger, in accordance with Paragraph 179(b) of the Operational Guidelines."

Recalling Decision 40 COM 7B.43 (adopted at its 40th session), reiterates its extreme concern at the potential impact of the elevated Orange Line Metro.

7. Decides, therefore, to inscribe the Fort and Shalimar Gardens in Lahore (Pakistan) on the List of World Heritage in Danger;

9. Urges the State Party to suspend without delay any further work in the immediate vicinity of the Shalimar Gardens and also requests the State Party, as a matter of urgency: a) to identify an alternative location for this specific section of the Orange Line Metro project, which may otherwise continue to have significant adverse impacts on the property;

c) To invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property.

Civil Society Observation: Unfortunately the State Party did not invite the RMM for over a year, and at the 41st Session stated that 'legally' they could not invite the RMM before the Supreme Court Judgment. Civil society clearly and definitively informed the WHC at the Plenary that this was a 'gross misrepresentation of the law' as the two were mutually exclusive, and that in fact if the RMM had been called, as was stated in court, it would have facilitated the Supreme Court's Judgment. This was an act of great injustice for neutral and partisan review of the facts.

Lahore High Court Judgment

Civil Society – Public Interest Litigation: The public interest litigation filed by civil society created headlines when the Honourable High Court gave a 'stay order' on eleven heritage sites, including the Fort and Shalimar Gardens, and the work

was stopped for over two years. The High Court gave a landmark judgment in favour of civil society, strongly condemning and stopping the project, asking for an enquiry into the matter.

The Lahore High Court in its judgment of 19th August, 2016, gave weight to the opinion of the UNESCO World Heritage Committee to stop the construction of the Orange Line Project¹:

- *“Expresses its serious concern about the development proposal of the Orange Line Metro, which will pass directly opposite the entrance of the Shalamar Gardens and above the remaining water tanks of the Shalamar hydraulic works;”*
- *“Urges the State Party to immediately suspend any further work associated with the Shalamar Gardens of the Orange Line Metro and, as a matter of utmost urgency, to identify an alternative location for this specific section of the Orange Line Metro...”*

Supreme Court Appeal - Judgment

The Punjab Government appealed against the Aug 19, 2016 Lahore High Court Judgment. The five member bench of Supreme Court of Pakistan in its split judgment of 8th December 2017 set aside the decision of Lahore High Court, Lahore dated 19th August 2016, directing the Punjab government to resume work on the project subject to 31 conditionalities.

Work on the project was started 24/7 after the Supreme Court Judgment completely overlooking the directions of UNESCO to call a Reactive Monitoring Mission for a neutral evaluation and report. Most of the 31 conditions are being violated, it is a ‘fait accompli’ serving no purpose as the damage has already been done.

Civil Society Review Petition: Following the Judgment of the Supreme Court dated 8.12.2017, civil society filed a ‘Review Petition’, seeking the indulgence of the apex court to review its earlier Judgment and issue an injunction against the respondents until the petition has been disposed. This review states that *fundamental concerns had been overlooked and the information provided by the State Party was mis-represented*. The review petition also places reliance on Article 9 ‘The Right to Life’ of the Constitution of Pakistan, highlighting that heritage is a public good. The ‘review’ has yet to be heard.

The review petition contends that the majority opinion has disregarded the aspect of visual intrusion of the monuments under consideration, it states the minority court opinion: “supporting a continuous deck throughout the length of the viaduct, which admittedly will cause irreversible visual intrusion, break the view line both from the outside and inside [see photographs] and grossly overwhelm the monument.” “There is absolutely no technical information/evaluation about the stability,

strength, endurance level/threshold, or vulnerability/susceptibility of the train.”

“The Mughal era hydraulic tank near the entrance of the Shalamar Garden, which is an integral part of the Garden is, according to Dr. Rogers, very close to the alignment of the viaduct, and will in fact be partially underneath the viaduct and is particularly at risk. The continuous low level vibration from the Train transit, in the opinion of Dr. Rogers, and undoubtedly the view and the visual impact of these features of the complex shall be obstructed and impaired by the elevated viaduct”.



Fig. 2: The Shalamar Garden Hydraulic Tanks are directly under the train track. The Garden wall is seen on the right. Photo: Altumush Saeed - March 2018

State of Conservation Report / Visual Impact Assessment

Civil Society Observation: The State Party submitted the Visual Impact Assessment Report to WHC on 29th November 2017, stating that the visual integrity and the outstanding universal value of the world heritage property will not be impacted by the planned metro construction. In our view the damage is irreversible and cannot be mitigated. It is ironic that the State Party HIA itself states that “damage to fabric and visual impairment is stated as High and Very High”.

The so-called ‘mitigating measures’ suggested in the report by way of “improved exterior landscaping”, “sympathetic design”, “greening of the structure”, “design and public art opportunities” besides being of generic nature are an eyewash and belittle the dignity of the WHS and are in fact wholly inconsequential and irrelevant.

The SOC also states: “All possible studies including HIA, EIA, VIA and Vibration Analysis Reports conducted to check any impact of Orange Line Metro Train Project on the World Heritage Property. The data collected through this scientific analysis have proved that there would be no adverse impact on the World Heritage Property that could compromise its Outstanding Universal Value.” This is mis-stated as there is no definitive evidence of the above. Infact in the Coningham report this is reported as being adverse and detrimental.



Fig. 3: The track has an imposing visual impact on the Garden.



Fig. 4: The train track completely destroy the historic views and visual integrity of the Garden.



Fig. 5: The train track can be seen from far inside the Shalamar Garden.

Photos: Altumush Saeed – March 2018

ICOMOS Pakistan / Civil Society Meets RMM Lahore: The UNESCO/ICOMOS RMM finally visited Lahore from April 22 to 28th 2018. In a meeting with the representatives of the RMM, ICOMOS Pakistan and civil society shared the factual situation and highlighted the fact that the train track had already been built and has caused ‘irreversible visual’ and other damage to the WHS. According to Decision 9, the Visual Impact Study, other documents and the RMM Report will be examined by the World Heritage Committee on its 42nd session at Bahrain in 2018.

Restoration of the Royal Kitchen Lahore Fort: Construction of New Kitchen Structure

The Royal Kitchen was built around 16th Century A.D. and is a marvel of architectural excellence. Neither of the State of Conservation Reports ie; 2017 and 2018 mention the huge concrete and cement structure made to house a ‘Fine Dining Restaurant’. It is imperative for all State Parties to inform UNESCO before carrying out any development work/addition/intervention near or inside World Heritage Sites. This structure has already been built, without following due process within the

Core Protected Zone of the World Heritage Site and is therefore illegal. I am currently Amicus Curiae, appointed by the Chief Justice of the Hon’ble Lahore High Court in a case filed by civil society against this illegal construction.

Civil Society Observations: To convert the Royal Kitchen into a restaurant would require complete renovation and serious repair/additions/alteration/injury/defacement which would damage the walls and the structure around the Royal Kitchen and would completely alter the value of authenticity and sense of history and place. As read with Section 20 of the Antiquities Act 1975, it will also require electric wiring, floor remaking, gas connections, pipes for sanitation, false ceilings, air conditioning and other repair works which will gravely threaten the structure of the Royal Kitchen and the adjacent structure of the Fort (Section 19 Antiquities Act 1975).

Article 6 (3): Each state party to this Convention undertakes not to take any “*deliberate measures*” which might damage directly or indirectly the cultural and natural heritage referred to in Article 1 and 2 situated on the territory of other State Parties to this Convention.” The proposal by the Walled City Authority to establish a restaurant in the “Protected Core Area” of the Royal Kitchens of the Lahore Fort is a deliberate measure that poses a serious threat to the integrity and authenticity of the site.

Civil Society in Distress

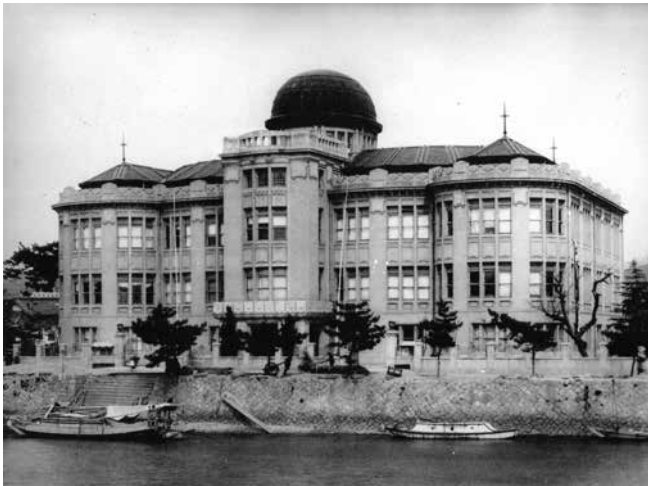
Shalamar Gardens: The Civil Society of Pakistan is deeply distressed that the elevated track has been built before due process. This is in absolute disregard for the sanctity of the UNESCO process. The visit of the RMM concluded on April 28th, the RMM evaluation report and the Visual Impact Assessment have yet to be reviewed by the WHC and its Advisory Bodies to make a factual, neutral and conclusive assessment. The damage to the WHS is irreversible causing a loss of authenticity and integrity which cannot be mitigated. The civil society of Pakistan requests that the concerns shared by the UNESCO WHC be taken seriously and that the ‘directions’ given by the WHC ie; WHC/17/41.COM/7B be ‘respected’.

New Kitchen Structure: Royal Kitchens – Lahore Fort: The already constructed ‘New Kitchen Structure’ is a blatant violation of the law and should be removed to restore and preserve the OUV, integrity and authenticity of the Royal Kitchens at the Lahore Fort World Heritage Site.

It is time to take a stand to create ‘positive precedents’ for safeguarding our heritage, or it will be lost forever. It is also time for civil society to be given a more inclusive role to provide information that is neutral and factual, something which is not always portrayed in the State of Conservation Reports and other information given to the WHC and its Advisory Bodies. We are confident that the path to safeguarding our heritage will be strengthened to support the Convention.

The Buffer Zone of the Atomic Bomb Dome is Being Destroyed

Terumi Mochizuki, The Organization Against Moving the Oyster Restaurant Near the A-Bomb Dome



The building was originally designed by the Czech architect Jan Letzel. It was completed in 1915 and was named the Hiroshima Prefectural Commercial Exhibition. It was used for educational and art exhibitions.

An atomic bomb was dropped at 8:15 a.m. on August 6th in 1945, and the bomb exploded at 580 meters above the hypocenter, which is about 150 meters east of the dome. The preservation of A-bomb Dome which was done in 1967 and 1996 proceeded with the donations of many people. Over 1,650,000 signatures were collected not only in Hiroshima and Japan but also from all over the world. The signatures had a big impact on the Diet (Parliament) and helped it to be placed on the UNESCO World Heritage List. The A-Bomb Dome is each citizen's asset. The government and the city have the duty to preserve it and pass it on to future generations.

Regrettably, the city secretly proceeded with the plan for the oyster restaurant Kanawa since three years ago. Although the restaurant was moved in the buffer zone, the city has never held a meeting concerning the surrounding landscape.

Again and again We have made the requests to the government and the city for withdrawing and reconsidering the plan of moving and building the Oyster Restaurant just near the A-Bomb Dome. Our voices have been ignored and the plan has been carried out. It opened at the end of September.



The biggest reason to withdraw and reconsider the plan is that the place is within not only the buffer zone but also the hypocenter. It is the place many people were killed by the atomic bomb. We can not understand why building a restaurant there was permitted. The Atomic Bomb Dome is "a special place that tells the tragic of history that humanity has lived through; it is a special place to pray for permanent world peace" as The Japan ICOMOS National Committee said. The buffer zone is "the area which aims at regulating organizing the settings and surrounding landscape of the world heritage property" and "an area that is deeply connected to the meaning of prayer for world peace and repose of souls that the property carries." This value must not be lowered by moving the oyster restaurant just near the A-bomb Dome.

The Japan ICOMOS National Committee expressed its strong concern. The local community just near the new restaurant, the Japan Confederation of A- and H-Bomb Sufferers Organizations, the Hiroshima Federation of Bar Associations, and so on expressed their request for the city "withdrawing" and "reconsidering." The government and the city have never listened to our voices and requests, and have forcefully proceeded with the plan. We have filed a lawsuit against the government to withdraw the restaurant's river occupancy permission. We continue to take action in order for it not to lower the value of the Hiroshima Peace Memorial (Genbaku Dome) as a World Heritage Site.

Annex

The Authors

Liezel Aldiano

Liezel Aldiano is the resident archivist of the Save the Ifugao Terraces Movement. She is an advocate of community archiving which aims to preserve collective societal memory through activist archiving. Aside from this, she is also an active member of groups defending the indigenous peoples' right to their ancestral lands and self-determination.

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Judith Angl

After having studied Egyptology and Islamic studies, Judith continued her academic career in the field of Heritage Conservation & Site Management where she specialised on the preservation of heritage in the MENA region and UNESCO World Heritage operations. Her Ph.D. research deals with orientalism and cultural heritage, she works in an honorary capacity for World Heritage Watch and runs the online initiative proheritage.org, raising awareness for intangible heritage.

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Yunus Arbi

Yunus Arbi (56) is a cultural-heritage specialist with background studies in archaeology and museology. His work focuses on the preparation of the World Heritage tentative list, the nomination process and the management of cultural World Heritage sites at the Ministry of Education and Culture of the Republic of Indonesia. He has been involved in the nomination processes pertaining to the Cultural Landscape of Bali Province since 2008. He actively initiated coordination among experts, stakeholders and communities to continue the nomination process focusing on subak system and water-associated temples. He has continued to support the management of Bali's Cultural Landscape since its inscription in 2012 by organizing studies on participatory mapping of the sites, stakeholder meetings and publications.

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Mohamed Athman Bakar

Mr. Bakar is the management committee board member for Save Lamu, a community-based organization focusing on sustainable and responsible development and preserving the environmental, social and cultural integrity of Lamu County. Mr. Bakar, a Swahili man, was born, raised, and lives in Lamu Old Town. He holds a Bachelor degree in social science and development studies. Currently he is working with Lamu Water and Sewerage Company as a chairman of Board of Directors and also as a volunteer in civil society organizations which promote community

activities such as the Kenya Marine Forum, implementing legal aid outreaches with Lamu Human Rights Watch and Keep Lamu Clean and Green campaigns with Lamu Youth Alliance.

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Ercan Ayboğa

Ercan Ayboğa (42) grew up in Germany as a child of Kurdish-Alevi worker migrants from Turkey. After studying at the Technical University of Darmstadt he worked as an environmental engineer on several projects in Germany. In 2006, while he was living for two years in Diyarbakir in Turkish-Kurdistan, he co-founded the Initiative to Keep Hasankeyf Alive, which is campaigning against the destructive Ilisu Dam Project on the Tigris. From 2007–11 he completed his PhD at the Bauhaus University of Weimar. From 2012–14 he was involved in two jobs on hydrology and nature conservation. In February 2015 he moved again to Diyarbakir, where started work with the Diyarbakir Metropolitan Municipality. At the same time he became involved in the Mesopotamian Ecology Movement where he is in charge of international relations.

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Vica Bayley

Vica Bayley is the Tasmanian Campaign Manager for the Wilderness Society, an organisation that has led conservation campaigns in Tasmania and across Australia since 1976. Vica was born and raised in Tasmania and worked in the primary and secondary schooling sector, teaching outdoor and environmental education, before joining the Wilderness Society's campaign team in 2001.

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Toon Bijmens

Toon Bijmens (29) is a Belgian civil-society activist with a focus on the Middle-Eastern region. He has worked in advocacy for Amnesty International and the Iraqi Civil Society Solidarity Initiative (ICSSI). In particular he has been involved with the Save the Tigris and Iraqi Marshes Campaign and is the current international coordinator. As part of this initiative, he has been campaigning in Iraq and internationally for the inclusion of the Iraqi Marshes on the UNESCO World Heritage List. Bijmens holds an MA in Modern History. He has worked on various development and humanitarian projects in Egypt and Iraq, and is currently project manager for a Dutch non-profit organization supporting sustainable economic development in developing countries.

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Valmira Bozgo

Valmira Bozgo (1982) graduated in Construction Management from Brigham Young University in Utah. She began her professional career working in the construction of City Creek Center, a project that introduced mixed-use buildings to downtown Salt Lake City. After two years at City Creek, giving heed to the environmentalist in her, Valmira went on to earn a two year Master's Degree in Environmental Engineering and Sustainable Infrastructure at the Royal Institute of Technology in Stockholm, Sweden. She then decided to apply her knowledge in Tirana, Albania working in the non-profit sector with projects funded by the UN and the EU aiming at environmental conservation. For more than 3 years now she has been the Head of the Solid Waste Sector in the Ministry of Urban Development.

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Adrian Crăciunescu is an architect from Romania. He is lecturer at the University of Architecture and Urbanism "Ion Mincu" in Bucharest where he teaches heritage conservation and its legislation. As attested specialist for architectural restoration, urbanism and historic parks & gardens and studies for historic monuments, he is member of the National Commission for Historic Monuments and chairman of one of its 12 zonal sections. He was general director for cultural heritage in the ministry of culture and personal advisor to several ministers and deputy ministers of culture. He was appointed team leader of a group that devised the Preliminary Theses of the new Code of Cultural Heritage, as part of the legal process of legislative initiative of the Government. He is secretary general of ICOMOS Romania.

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Llenel de Castro

Llenel de Castro has been part of the Save the Ifugao Terraces Movement since 2015 as program coordinator of The Handi Project—a heritage appreciation program for Ifugao youth. Handi aims to bring the Ifugao youth closer to their own cultural resources and to engage them in participating in heritage conservation. When not in Ifugao, she focuses on creating avenues to make heritage learning more accessible in archaeological sites in the Philippines.

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Wiwik Dharmiasih (35) is a lecturer at the Department of International Relations, Universitas Udayana in Bali, Indonesia. Her research focuses on political geography, conflict transformation and community-based natural-resources management. She provided social and legal analysis for the World Heritage nomination of the Balinese irrigation system, subak (2010-2011) and was the Coordinator for Program and Planning at the Governing

Assembly for Bali's Cultural Heritage (2012). She was involved in the establishment of Forum Pekaseh Catur Angga Batukau and helped design the monitoring and evaluation system for management of the World Heritage property in Bali. She has actively supported community participation and youth involvement in the management of this property by initiating ProjectKalpa and subak preservation with the NGO Yayasan Sawah Bali.

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Sonja Dimoska

Sonja Dimoska is a graduate of Tourism and Catering at the St. Clement of Ohrid University; holds a degree in philosophy from Ss. Cyril and Methodius University of Skopje; and additionally completed a Master of Business Administration at National Taiwan University. She currently works in marketing and, since 2015, has been a dedicated member of Ohrid SOS, a citizens' initiative devoted to the protection of the UNESCO Ohrid-Prespa region in the Republic of Macedonia.

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Kate Fielden

Dr Kate Fielden is Honorary Secretary to the Stonehenge Alliance. As an archaeologist and Trustee of CPRE Wiltshire Branch she has been involved in planning issues at Avebury and Stonehenge for around 30 years and helped in the formation of successive Local Development Plan policies and WHS Management Plans for the WHS. She is currently Vice Chairman of Rescue: The British Archaeological Trust, and of the Avebury (Civic) Society which she represents on the Avebury WHS Steering Committee.

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Oumaima Gannouni

Oumaima Gannouni (1990) grew up in Carthage where she lived and studied around Punic, Roman and early Christian archaeological sites. She obtained a BA in Humanities, the Arts and Social Thought from Bard College Berlin where she spent a year in Nepal studying the anthropological revelations of seeing and posing. During this time she worked as a photojournalist for the local weekly English newspaper "The Nepali Times". As part of her World Heritage Master Studies at BTU Cottbus, Germany, she interned with the UNESCO Center and took part of the World Heritage Committee meeting in Istanbul 2016. Oumaima is presently writing her MA thesis on the relation between Development and Freedom in the context of Tunisia's history.

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Tamar Gelashvili

Tamar Gelashvili has a Bachelor's Degree in European Studies from Ilia State University and in 2012 obtained a Masters in the Media and New Technologies Program at Tbilisi State University. She has worked as a journalist for several years, currently for Studio Monitor, an independent media organization covering topics such as corruption, misuse of power by government representatives, problems concerning people, and issues that interfere with social, economic and cultural development of Georgia.

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Elke Greiff-Gossen

Elke Greiff-Gossen (1961) is an information scientist from the Technical University of Dortmund and the executive director of go_on Software GmbH in that town. Ms. Greiff-Gossen's family has owned a house in St. Goarshausen on the Rhine river - near the Loreley Rock - since 1589, which is a protected cultural monument. She is a member of the "Rhine Transit Routes Citizens' Initiative" and operates several websites and blogs on the Loreley Rock, castles and ferries on the Rhine.

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Fritz Groothues

Fritz Groothues studied in France and Germany and after two years as a social researcher in Ghana he moved to the UK in 1974. He spent most of his working life in the BBC World Service, first as a producer, then as Head of Strategy Development. His wife Christine has had close ties to the Lake District since childhood and attended school in the area. As a couple they have developed a great love for the Lake District, after many decades of regular visits. From 2001 they noticed an influx of off-road vehicles, which had a devastating impact on the natural environment of this National Park and World Heritage site. They launched the campaign 'Save the Lake District' in June 2017, with the aim to ban off-road vehicles from unsurfaced tracks.

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Musa Oluwaseyi Hambolu

Dr. Musa Oluwaseyi Hambolu. 60 years, is an archaeologist and presently teaches in the Department of History and International Relations of Veritas University in Abuja, Nigeria. He recently retired from the services of Nigeria's National Commission for Museums and Monuments where he was the Director of Research Planning and Publications. One of his duties was the supervision of archaeological excavations at proposed World Heritage Sites, and participation in stakeholders meetings. Dr. Hambolu continues to participate in research projects in archaeology, ethnography and culture history as a private researcher.

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Eman Shokry Hesham

Eman Shokry Hesham is an Egyptian doctorate student at the BTU Cottbus-Senftenberg in Germany. Currently she studies and conducts research on Heritage Management and Social Impact at Heritage Sites, with special regard to those in Egypt. After graduation in 2004, Hesham worked at the National Organization for Urban Harmony, Ministry of Culture as an architect. After obtaining her Master's Degree in Economics of Heritage in Italy in 2009, she worked at October University for Modern Sciences and Arts as an assistant lecturer. Finally, she worked at the German Archaeological Institute in Cairo as an architect for the project AEGARON before staying in Cottbus to initiate her study for the Doctoral degree. Hesham recently completed a Heritage Impact Assessment course organized by WHITRAP under the supervision of UNESCO in Vigan city, the Philippines.

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Archana Jayaraman

Archana is a sustainability knowledge management specialist, with training in design and implementation of transdisciplinary environmental research. Her working background is in water security issues in Asia and in the conservation of world heritage sites, including cultural landscapes by exploring nature-culture interlinkages. Her previous project engagements include assignments with APN, IWMI, TERI and British Council with advisory experience on youth involvement in climate change. She has experience in sustainability communications through target based content generation for institutes, NGOs, funding agencies, UN documentation and public awareness campaigns. Currently she works for the Small Grants Programme of UNDP/GEF as a knowledge management consultant.

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Zulfiqar Ali Kalhoro

Dr Zulfiqar Ali Kalhoro (39), an anthropologist, is head of the Department of Development Studies at the Pakistan Institute of Development Economic (PIDE). Before joining PIDE he worked in the Taxila Institute of Asian Civilizations where he studied and documented monuments, carved wooden coffins, mosques and petroglyphs in Gilgit-Baltistan. He has worked on the art and architecture of three regions of Pakistan – Sindh, Gilgit-Baltistan and Potohar (Punjab). He is the author of books and many articles published in national and international journals about Islamic art and architecture, and about the Sufism, Hindu and Sikh heritage of Pakistan. He is actively involved with the Endowment Fund Trust (EFT) to preserve, restore and document Sindh Heritage. His most recent research has been on sati and hero stones in tombs and monuments of southern Pakistan.

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Aleksandra Kapetanović

Aleksandra Kapetanović is a conservation architect, one of the founders and coordinator of EXPEDITIO - Center for Sustainable Spatial Development based in Kotor, Montenegro. She graduated from the Faculty of Architecture at Belgrade University, Serbia, and finished a postgraduate course on Architectural Conservation Studies at AlNova in the Slovak Republic and a Master in New Technologies for Valorisation and Management of Mediterranean Heritage in Italy. Through the work in the NGO sector since 1997 she has gained experience in different cross-disciplinary activities related to cultural heritage such as research and studies, projects in architecture and restoration, management plans, and working with local populations. Her personal work focus is cultural landscape and public participation in cultural heritage protection.

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Aleksandra Koroleva

Aleksandra Koroleva, a biologist and ecologist, is the co-chair of the environmental NGO Ecodefense and one of the authors of the book "Curonian Spit - Cultural Landscape" (2008). From 2005 to 2009 Aleksandra Koroleva worked as deputy director for environmental education in the Curonian Spit National Park. Ecodefense organized youth environmental camps on the Curonian Spit in the periods 1996-2000 and 2007-2010. Participants of the camps, including from Lithuania, Poland and Germany, reinforced the for-dune with traditional methods. In 2003, Ecodefense organized a successful 'Stop D6' campaign in defense of UNESCO's World Heritage Site, as a result of which the oil extraction project on the Baltic Sea shelf underwent an international environmental assessment.

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Mikhail Kreindlin

Mikhail Kreindlin (1970) is a biologist and lawyer. He participated actively in the work of the Nature Protection Squad (Druzhina) of the Faculty of Biology of the Moscow State Lomonosov University in the period 1986-98. In 1991-2002 he worked in state structures dealing with management of protected areas. He works now as Protected Areas Campaign Coordinator for Greenpeace Russia and has been involved in work related to natural World Heritage properties since 2001. He has conducted various court cases connected with the protection of the natural World Heritage properties.

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Geoff Law

Geoff Law has spent much of his life protecting forests in Tasmania and has been awarded membership to the Order of Australia for his work as a conservationist. Advocacy is his speciality, and his efforts resulted in the inscription of the Tasmanian

Wilderness on the World Heritage List in 1982. He has worked as advisor to Goldman Prize recipient Bob Brown. His experiences in conservation and advocacy at the Franklin and lower Gordon Rivers in Tasmania can be found in his memoir *The River Runs Free*, published in 2008. He has authored and published several other texts about his conservation work and has received research grants to study forests inscribed on the World Heritage List in Japan, Slovakia, and the USA. Currently, he works as a consultant for the Wilderness Society on World Heritage issues and is enrolled in a research project at the University of Tasmania.

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Alessandro Leonardi

Alessandro Leonardi, born in Catania, Sicily, in 1973, has been an Attorney-at-law since 2004, practicing administrative law, and a permanent state high school teacher in Law and Economics since 2015. He conducts research projects in international law and international relations, strongly supporting the value of trans-local relationships as an effective means to counter the risks of globalisation. His scientific researches focused on city diplomacy and cultural diplomacy issues and are mostly dedicated to the cultural heritage of Sicily.

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Gyatso Lepcha

Gyatso Lepcha belongs to the indigenous Lepcha community in Sikkim and is a resident of Dzongu, the indigenous Lepcha reserve. He studied law and has been part of the movement against destructive Hydro Power projects in the State since 2004. He was also a part of the historic hunger strike against the proposed dams. In 2009 he started an ecotourism initiative in Dzongu with the intention of creating an awareness about the region's rich ecology and indigenous cultural practices. Through this he intends to also make a statement to the government that economic development is possible without destroying the ecology and culture of a region. He is currently the General Secretary of the Affected Citizens of Teesta (ACT) and has started a campaign for free flowing rivers in the State.

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Tseten Lepcha

Tseten Lepcha belongs to the indigenous Lepcha community in Sikkim and is a resident of Chungthang in North Sikkim, which is the dam site of the Teesta III hydroelectric power project - the largest hydroelectric project in the region of Sikkim. He is a founding member of Affected Citizens of Teesta (ACT), and a former honorary wildlife warden of North Sikkim, where a large part of Kangchenzonga National park is located. He is also a Plenary Board Member of the World Mountain People's Association (WMPA) based in Paris.

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Adam Markham

Adam Markham is Deputy Director of the Climate & Energy Program at the Union of Concerned Scientists (UCS), an NGO based in Cambridge, MA (USA). In 2016, he was the lead author for a UNESCO/UNEP/UCS report, World Heritage and Tourism in a Changing Climate. Before joining UCS in 2013, Markham was President of the climate solutions NGO, Clean Air-Cool Planet, and previously directed WWF's international climate campaign. He currently serves as a member of the Climate Change Strategies and Archaeological Resources Committee of the Society for American Archaeology (SAA), and the steering group of IUCN's Protected Areas and Climate Change Specialist Group. He has been on the board of the US committee of ICOMOS since 2017, and is a bureau member of the new ICOMOS Working Group on Climate Change and Heritage.

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Kreshnik Merxhani

Kreshnik Merxhani (1982) graduated in architecture studies at the Polytechnic University of Tirana in Albania. Since 2008 he has focused on traditional architecture, restoration projects and artistic photography, particularly in Gjirokastra. From 2008-12 he was trained in restoration by Cultural Heritage without Borders. In 2012-14 he was the project manager of a restoration project of the Hammam (turkish bath) in Kruja, another historic city in Albania. From 2014-16, he was head of the Technical Department at the Regional Directory of National Culture in Gjirokastra, serving as chief architect for the design of several restoration and revitalization projects. He carried out a risk assessment of all the listed monuments in the region of Gjirokastra and since 2016, he has been the group leader and architect for restoring the city's old Bazaar.

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Elena Minchenok

Born in St Petersburg (Leningrad) in 1983, Elena Minchenok graduated from St. Petersburg State University as a Slavist. She was a co-founder of the NGO "Living City" (2006), one of the most influential civic organizations of the 2000's in St. Petersburg. In 2007 she joined the Russian National Heritage Preservation Society, and currently is a project manager within the organization. In 2009 she became a member of ICOMOS, and in 2011-2012 was editor, author and translator of a bilingual book "Saint Petersburg: Heritage at Risk", a project that involved an international team of contributing authors. Currently she develops a project of bilateral conferences between the St. Petersburg heritage preservation expert community and the one of the WHS Val di Noto (Sicily) in collaboration with CUNES (Coordinamento Città UNESCO Sicilia), ICOMOS St. Petersburg and the Likhachev Foundation.

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Terumi Mochizuki

Mr. Mochizuki is 65 years old and has been a teacher at high school. He is now retired. He is one of the organizers of Peace Seminars for Hiroshima High School Students and also the Deputy Secretary General of The Organization Against Moving the Oyster Restaurant Near the A-Bomb Dome.

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Sergiu Musteață

Sergiu Musteață, a historian from the Republic of Moldova, is president of ICOMOS-Moldova and founder of the National Association of Young Historians of Moldova. Sergiu Musteață is an expert on cultural heritage preservation and was director of many national and international projects on heritage issues. He is the author of seven monographs and more than three hundred scientific publications. Sergiu Musteață is one of the Law on Archaeological Preservation in the Republic of Moldova. He has edited more than thirty books, and is editor of two annual journals. His major research interests are in the history of Eastern Europe, cultural heritage preservation, and textbook analysis.

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Yulia Naberezhnaya

Yulia Naberezhnaya was born in Sochi, Russia, and has been actively working there most of her life. She studied ecology and rational nature management at the International University for Ecology and Political Science in Moscow and is interested in different perspectives of natural heritage and protected areas. Currently she is the Deputy Coordinator of the NGO Environmental Watch on the Northern Caucasus, an organization she has been with since 1998. An active member of the Sochi branch of the Russian Geographic Society since 1995, she is a member of the Expert Group for the Committee for Tourism and Ecology within the Sochi City Assembly. As an external expert she is often asked to provide environmental expertise of the Ministry for Nature of Krasnodar Region. Since 2015 she is also Deputy Chair of the Coordinating Environmental Council under the Mayor of Sochi.

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Iryna Nikiforova

Iryna Nikiforova (1962) is Deputy Head and a co-founder of the NGO "Initiative for St. Andrew's Passage". An interpreter, in 1984 she graduated from the Kyiv National Linguistic University, specializing in foreign languages. Since 2008 she has engaged in the sphere of protecting historical and cultural heritage, working on numerous boards, councils and commissions. On her initiative, the government created the Commission on uncontrolled constructions in the buffer zone of the Saint Sophia National Preserve. She was a member of the commission inspecting questionable constructions in the historical part of the city and

took part in numerous meetings and conferences on issues of hydro-geological problems on the territory of the Saint Sophia National Preserve. She has numerous national awards for her work protecting cultural heritage.

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Lenin Oviedo

Lenin Oviedo was born in 1993 in Riobamba, Ecuador. When he was seventeen years old he made three radio programs for the Radio Municipal of Quito. After that, he studied Social Communication at Central University of Ecuador. For a Bachelor thesis he studied the problems around the heritage found in San Francisco's Square because it gets all the themes that he studied at his faculty: protection and safeguarding heritage; authorities do not take careful decisions and exist civil mobilisations that claim its protection. He decided to surveil the construction in San Francisco because Odebrecht and Acciona are both companies that receive a lot of critics for corruption in other projects and countries that they had administered. It was easy for him to take the photos because he lives near San Francisco square, in the La Loma neighborhood.

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Pesticide Action Network

Pesticide Action Network (PAN) International is a network of over 600 participating non-governmental organizations, institutions and individuals in over 90 countries working to replace the use of hazardous pesticides with ecologically sound and socially just alternatives. PAN was founded in 1982 and has five independent, collaborating Regional Centers that implement its projects and campaigns.

For more information visit <http://pan-international.org/>

Andrey Petrov

Andrey Petrov (1958) is a geographer. He graduated from the Faculty of Geography of the Moscow State Lomonosov University and then worked there as a scientist. He was an active member of the Nature Protection Squad (Druzhina) in the period 1977-1990 and has a PhD. He has worked as World Heritage Campaign Coordinator in Greenpeace Russia since 2005. He is an expert in questions regarding protected areas, environmental tourism and the application of the World Heritage Convention. He was elected as one of the Heritage Heroes at the 39th Session of the World Heritage Committee. Andrey has travelled extensively throughout Russia and has visited 76 other countries.

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Necati Piringçioğlu

Necati Piringçioğlu was born in Derik in the Province of Mardin in 1975. He finished primary and secondary education in Derik, and high school in Diyarbakır, then studied at the Faculty of

Engineering and Architecture of Dicle University in Diyarbakır, and graduated from the Department of Architecture in 1998. From 1998-1999 he worked as a free-lancer, and in 1999 began working as an architect in the Metropolitan Municipality of Diyarbakır. From 2005 to 2009 he was engaged in the "Initiative to Keep Hasankeyf Alive". From 2007 until 2013 he was the chairperson for the chamber of architects of Diyarbakır in many civil society campaign and activities. He has been involved in preparing the WH nomination of Diyarbakır Fortress and Hevsel Gardens as spokesperson of the Advisory Board.

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Gerry Proctor

Gerry Proctor has an Honours in Theology and a Masters in Philosophy at Liverpool Hope University with a thesis entitled "A Commitment to Neighbourhood". He worked for eight years with young people in the town of St Helens and then spent six years living and working in Latin America in poor communities in Ecuador and Bolivia. He then returned to Liverpool, his birthplace, and worked for 12 years in charge of one of the largest Roman Catholic communities in the city. In the past decade he has lived in the apartment complexes of the city centre and waterfront working with residents and founding Engage Liverpool which works to improve people's quality of life and raise the profile of urban issues to improve the sustainability of city living. He sits on the Liverpool World Heritage Site Steering Group.

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Herbert Rasinger

Since 2015, Herbert Rasinger has been chairperson of the cityscape protection initiative (Initiative Stadtbildschutz) based in Vienna, Austria. He is active in the protection of cultural heritage sites (last atelier of Gustav Klimt) and other city protection matters (Wien Mitte and the Vienna ice skating ring). He is a graduate of Vienna Technical University and Wilmington Friends School, Wilmington, Delaware, USA.

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Kate Saunders

Kate Saunders (1964) heads monitoring and communications for the International Campaign for Tibet, managing a field operation of Tibetan researchers, interviewing Tibetan sources and writing analyses on the situation in Tibet. Kate is a writer and journalist who has specialized in Tibet for around 15 years, advising journalists, academics, Parliamentarians and government ministries. Kate has written numerous reports for the International Campaign for Tibet and her book, 'Eighteen Layers of Hell: Stories from the Chinese Gulag' was published by Cassell in 1996. Her articles have been published in newspapers and magazines worldwide including The Guardian, The Times, Washington Post, Times of India.

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Daniel Scarry

Daniel Scarry has been a member of Ohrid SOS since 2015. He has authored / contributed to several articles on the subject of threats to the natural heritage of the Ohrid region.

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Sergey Gerasimovich Shapkhaev

Sergey Gerasimovich Shapkhaev (1948) is Director of the NGO Buryat Regional Union on Lake Baikal (NGO) in Ulan-Ude, Russia. He graduated from the Leningrad Hydrometeorological Institute specializing in oceanology, and then carried out post-graduate study in geophysics. He has experience in law-making at federal and international levels, including in the development of a federal law on the protection of Lake Baikal, and in preparing the World Heritage nomination for Lake Baikal. He participated in environmental assessments of mining projects, major hydro-electric schemes, and oil-and-gas pipeline-systems in different regions of Siberia and the Far East of Russia.

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Eugene Simonov

Eugene Simonov is an environmental activist and expert residing in China. He is the International Coordinator of the Rivers without Boundaries Coalition (RwB) focusing on North Eurasia trans-boundary rivers. He collaborated with the WWF Amur Program to curtail three hydropower projects and designed methodology for basin-wide environmental impact assessment of hydropower and analysis of hydropower role in flood management. He also works with the trilateral "Dauria" International Protected Area and Sino-Russian Expert Committee on Biodiversity and Protected Areas. Since 2016 Eugene has worked with the Green Silk Road Coalition that aims to push for more accountability and environmental sustainability of China's Silk Road Economic Belt integration initiative.

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Klaus Thomas

Klaus Thomas (1948) is an MBA who has retired from the Federal Ministry of the Interior and is now the spokesperson for the "Bürgerinitiative Rheinpassagen" (Rhine Transit Routes Citizens' Initiative) which works for the conservation of the landscape and culture of the Middle Rhine. This includes various activities to fight against noise harassment from rail and road traffic in order to transmit this unique landscape unscathed to future generations.

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Imrana Tiwana

After graduating from the National College of Arts, Lahore, Imrana Tiwana went to Massachusetts Institute of Technology (MIT) for graduate studies on an Aga Khan Scholarship. She headed the MIT Environmental Design Forum and did course work from Harvard University. She was the first and only recipient of the Aga Khan Scholarship to be selected by the President of Malaysia, Mahatir Muhammad, to reassess urban Malaysian planning. After working in New York she returned to Pakistan to work as an architect. However, she soon plunged into efforts to save the built heritage of Lahore, recruiting many of her colleagues to the cause. She is an architect by profession but an environmentalist at heart.

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Petko Tzvetkov

Petko Tzvetkov, age 45 years, is an ecologist and environmental activist. He is a project manager with the Bulgarian Biodiversity Foundation (IUCN member), which is part of For the Nature Coalition of NGOs and citizen groups in Bulgaria, and board member of the European Green Belt Association. Since the year of 2000, he has been involved in campaigning for the preservation of Pirin NP and WH Site but also in the preparation of the Pirin NP Management Plan (2004).

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Alexandra Velasco Villacís

Alexandra is a visual artist graduated from the Saint-Luc Superior School of Arts (Belgium). Presently she is a student of Master of Visual Anthropology at the FLACSO (Facultad Latinoamericana de Ciencias Sociales – Ecuador). Her research areas are interculturality and community media. She works as a graphic designer for different NGOs in Belgium and Ecuador, and collaborates with different groups in social, cultural and artistic projects, such as Kitu Milenario, whose goal is to valorate and divulge knowledge about Andean history and cultures from Quito in particular.

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Diego Velasco Andrade

Diego Velasco Andrade is an urban architect at the Universidad Central de Ecuador. He completed his graduate studies, masters and doctoral, at the Ecole Polytechnique de Mons and Université Catholique de Louvain, Belgium, and then became a researcher and specialist in Semiotics and urban and cultural anthropology at the Universidad Central del Ecuador. He is also a writer and cultural activist, and a member of the Colectivo Kitu Milenario and the Epistemic Communities of the Universidades Centrales and Universidad Católica de Cuenca, Ecuador.

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Shweta Wagh

Shweta Wagh is a conservationist by training, and faculty at the Kamla Raheja Institute of Architecture (KRVI) in Mumbai. She is also with the Collective for Spatial Alternatives (CSA) a research, planning and advocacy collective. Her research interests include: discourses around heritage and environment, political ecology and the commons, nature-culture linkages, indigenous landscapes and rights based approaches. She is a member of ICOMOS India and part of the National Scientific Committees on Cultural Landscapes and Historic Towns and Villages. Since 2011 she has been involved in analyzing the impacts of development on environment and local heritage in the Kanchenjunga Biosphere Reserve. In 2012 she intervened for the revision of India's tentative list for World Heritage Sites, arguing for the inclusion of indigenous perspectives.

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Günter Wippel

Günter Wippel holds a degree in economics and has worked on issues such as uranium mining and human rights since the 1980s. He was a co-organizer of the The World Uranium Hearing in Austria (1992) and has attended many conferences on the issue of uranium mining. In 2003, he co-founded a human rights group, MENSCHENRECHTE 3000 e.V., connecting human-rights violations and environmental destruction. This NGO has also worked for many years on the rights of indigenous peoples. In 2008, he initiated the working group "uranium-network.org" and co-organized international conferences on the impacts of uranium mining in Bamako / Mali (2012), in Tanzania (2013) and in Johannesburg / South Africa (2015). The NGO works with communities affected or threatened by uranium mining worldwide, focusing most recently on countries in Africa.

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WORLD HERITAGE WATCH

World Heritage Watch is an independent non-governmental organization founded in 2014 and committed to the preservation of the UNESCO World Heritage worldwide. We keep watch that the World Heritage is not sacrificed to political compromises and economic interests. We support UNESCO in obtaining up-to-date, complete and accurate information about the situation of the World Heritage properties. And we help local people to protect their sites and to have a reasonable benefit from them.

More and more world heritage sites are endangered by development pressure, mass tourism, armed conflict, resource depletion, climate change, building activities, but also by neglect and poor management. In UNESCO, recognition has now grown that the over 1.000 World Heritage properties can not be monitored, protected and sustainably managed without the active involvement of local people.

Our goals

World Heritage Watch has the following objectives:

- To raise awareness about the importance of UNESCO World Heritage;
- To strengthen the role of civil society in the UNESCO World Heritage Convention;
- To support UNESCO in protecting and safeguarding world heritage sites.

World Heritage Watch pursues these goals by

- building a network and forum for the exchange of information and experience of its members;
- supporting NGOs and local communities who work for their World Heritage sites;
- helping to bring updated and detailed information relevant to the preservation of the World Heritage properties to the attention of governments and UNESCO;
- informing the public about developments related to the World Heritage properties.

World Heritage Watch considers itself to be an enabling and facilitating platform providing support, coordination and communication for our global network of civil society actors who are committed to "their" World Heritage property and will notify us of dangers that threaten them. Our highest concern is the reliability of our information and the technical quality of our work.

Many of the people who work for the world heritage live near remote nature reserves, in developing or unfree countries. Often they do not have a chance to make themselves heard. We will strengthen their voices in the world public, with UNESCO and their governments.

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