

World Heritage Watch Report 2019



World Heritage Watch

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Editorial Team

Stephan Doempke (chief editor), Pratiti Joshi, Andrea Martinez Fernandez, Michael Turner and Maritta von Bieberstein Koch-Weser. Map editor: Andrea Martinez Fernandez

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Back cover map: Andrea Martinez Fernandez

Cover, Design and Layout: Bianka Gericke, LayoutManufaktur.Berlin

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Preface

The recent fire of Notre Dame Cathedral in Paris was – besides the one that ravaged the National Museum of Brazil – the most widely noted event of the past year in the context of the protection of cultural heritage. Countless reactions from all over the world filled social media on the evening of the fire. They demonstrated that there are monuments that people from all over the world identify with. Although owned by one state – in this case, France – these monuments are understood by the world as common heritage, something that in a certain way belongs to all of us.

Exactly this is the basic idea of the World Heritage Convention: There are objects of natural and cultural heritage that transcend national significance and become the common heritage of humankind as a whole. Therefore, it is up to humankind as a whole to provide for their protection and preservation. The 193 State Parties of the World Heritage Convention have committed themselves to this task, and the 21 members states of the World Heritage Committee, who in varying composition represent the international community, are supposed to ensure that it is actually implemented.

The global response to the fire of Notre Dame has shown that the idea of a “World Heritage of Humanity” has borne fruit throughout the world. Within hours – even before the fire was extinguished – the richest families in France donated 600 million Euros for the reconstruction of Notre Dame, and in the following days more donations from all over the world amounting to hundreds of millions of Euros were donated, and support by urgently needed expert restorers was committed.

Disastrous events such as the fire at Notre Dame attract the attention of the entire world, reminding us for a moment of how vulnerable and endangered our natural and cultural heritage is at any given moment. The civil society network of World Heritage Watch has set itself the task of drawing attention to the unobserved threats to World Heritage, literally and figuratively, before it burns. Our annual World Heritage Watch Report first and foremost serves this purpose.

In the weeks before the fire of Notre Dame, vast forest fires had already destroyed much of the Tasmanian Wilderness, and on the same evening the Al-Aqsa Mosque burned in Jerusalem, both also part of the common heritage of humankind. Although the fire of the Al-Aqsa Mosque was much smaller and did not cause substantial damage, it did involve a cultural monument that, like Notre Dame, is of highest spiritual importance to a world religion. And yet, this event was hardly worth a message to any of the big media.

Those who follow the work of World Heritage Watch know that there are dozens of other World Heritage sites and thousands of further cultural monuments, historic cities, cultural landscapes and nature reserves which are threatened by multiple factors while we cannot escape the feeling that political leaders would be particularly concerned about them. On the contrary, they are increasingly being sacrificed to short-term economic interests.

Unfortunately, a lack of a cosmopolitan sense of responsibility, and the forcing through of national and unrelated interests which can be observed in many other fields – e.g. in human rights and climate change – have increasingly taken over the works of the World Heritage Committee as well, the very body which should actually be the guardian and expression of the idea of a common world heritage of humankind. As a result, this very idea runs the risk of losing its credibility. Therefore, in addition to monitoring the situation of individual World Heritage properties, the World Heritage Watch network will become increasingly involved in the policies and procedures of the World Heritage Convention as an instrument of global governance.

It is imperative that the protection and safeguarding of the natural and cultural heritage be given a higher priority in politics and become an independent topic of development cooperation. The richer countries in particular are called upon to do much more for the protection of the world natural and cultural heritage, as mandated in Target 11.4 of the Sustainable Development Goals. There is a blatant contradiction between increasing the number of World Heritage sites by more than 20 each year while not providing and even reducing the means of their safeguarding. If this trend continues, we should not be surprised to lose many more World Heritage Sites in the future.

The call for greater financial commitment also relates to the private donor community. Nobody would contend that the work of our global network of more than 150 civil society initiatives committed to the protection and preservation of the World Heritage does not merit support. Nevertheless it is our depressing experience that the guidelines of virtually all foundations and governmental programs aiming at the support of civil society preclude their activities when it comes to supporting nature *and* culture, developing *and* industrialized countries, the global networking of civil society and its participation in international decision-making processes, as demanded by international consensus. We therefore call upon the foundation sector to review their guidelines with a view to making them more compatible with the mandate of the World Heritage Convention.

The World Heritage Watch Report 2019 presented here is yet another eloquent testimony that many governments still need to raise their awareness that they share the right to manage World Heritage sites in their territories with the world community, and that they have an obligation to preserve their world heritage sites not only for their own nations but for humankind as a whole.

Berlin, May 2019

Maritta Koch-Weser, President

Stephan Doempke, Chairman of the Board

I. Natural Properties

Water Infrastructure Impacts on World Heritage – How to Prevent or Minimize them?

Eugene Simonov, Rivers without Boundaries International Coalition (RwB)¹



Impacts from water infrastructure in basins where World Heritage properties are located appear to be the most serious and irreversible factor in the degradation of such properties, exacerbating the long-term effects of climate change. Before it is too late, Parties of the WH Convention need to develop systemic measures to ensure that World Heritage properties do not fall victim in the context of growing competition for water, power and international investment (WHW 2018). In Decision 40 COM 7 (2016) the Committee “considers that the construction of dams with large reservoirs within the boundaries of World Heritage properties is incompatible with their World Heritage status, and urges States Parties to ensure that the impacts from dams that could affect properties located upstream or downstream within the same river basin are rigorously assessed in order to avoid impacts on the Outstanding Universal Value (OUV)²”.

At its 42nd Session in 2018, the Committee belatedly inscribed on the List of World Heritage in Danger the Lake Turkana Parks in Kenya severely impacted by the Gibe III dam in Ethiopia (WHW 2018), and expressed grave concern regarding the Stiegler’s Gorge hydropower on Rufiji river, which is incompatible with the World Heritage status of the Selous Game Reserve. It asked Tanzania “to conduct an SEA and consider alternative options to meet its power generation needs” (42 COM 7A.56). By the time of those decisions Lake Turkana has been already irreversibly damaged by lowering water levels, while Tanzania neglected the World Heritage concerns and proceeded with bidding for dam construction and completing preparatory works. These are just two most outrageous examples from two dozen in the 2018 SoC Reports (Fig. 2).

At the same time hydropower, which is the primary purpose for most large dams to be built, is in sharp decline for the 5th year in a row (Fig. 1) due to growing governance, financial, environmental and social obstacles. Other renewable energy alternatives – gas, wind and solar – pushed dams aside by attracting most of the new investments into energy generation.

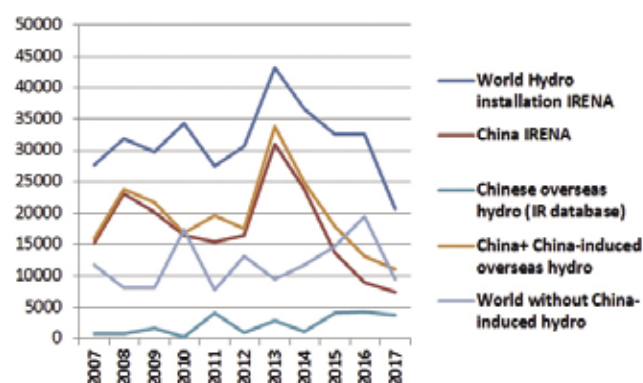


Fig. 1: Hydropower installation in MW

(IRENA and IR databases)

Most of the hydropower capacity world-wide has been installed in China, creating considerable threats to some World Heritage properties (e.g. Three Parallel Rivers). However since 2013 hydropower construction in China has decreased dramatically, and most potentially harmful dam projects are being removed near some World Heritage properties (e.g. Dujiangyan Irrigation). At the same time, Chinese engineering firms and banks look for hydropower opportunities overseas. They are still involved in more than half of the hydropower projects completed globally, and China’s state banks provide 75% of global hydropower financing in 2017. This makes China, a member of the current World Heritage Committee, uniquely positioned to take a lead in making sure that hydropower does not negatively affect World Heritage world-wide.

Most worrying though, is the fact that the decline in hydropower does not translate into a **decline of threats to most important biodiversity hotspots**. Thus, in the last 5 years the share of natural World Heritage sites threatened by dams increased from 21% to 24%³ (Fig. 3). According to the 2013-2018 State of Conservation Reports, at least 33 World Heritage sites in 25 countries are affected or threatened by impacts from hydropower and water infrastructure (Fig. 4). The same holds for other important “no-go” areas, such as Ramsar wetlands, migratory pathways of endangered and economically important aquatic species, legally protected areas, etc.

¹ Paper is based on resolution adopted at the 5th WHW Forum in Bahrain in June 2018.

² Decision : 40 COM 7 <https://whc.unesco.org/en/decisions/6817/>

³ Data from draft decision 42COM/7 compared with previous UNESCO statistics on threats to WH.

Fig. 2: Examples of World Heritage sites affected by water infrastructure in 2018 SoC Reports

Properties	States Parties	Threat as listed in the SoC DB	Danger List	Natural or cultural	Transboundary Impact (TI) or International Investment
Dja Faunal Reserve	Cameroon	Water infrastructure (WI)	No	N	
Grand Canyon National Park	United States of America	WI	No	N	
Iguaçu National Park	Brazil	WI	No	N	
Iguazu National Park	Argentina	WI	No	N	TI
Keoladeo National Park	India	WI	No	N	
Lake Baikal	Russian Federation	WI	No	N	TI / Invest
Lake Turkana National Parks	Kenya	WI	No	N	TI / Invest
Lower Valley of the Omo	Ethiopia	WI	No	C	Invest
Precolumbian Chiefdom Settlements	Costa Rica	WI	No	C	
Serengeti National Park	United Republic of Tanzania	WI	No	N	TI
Kenya Lake System in the Great Rift Valley	Kenya	mentioned in Serengeti report	No	N	TI
Volcanoes of Kamchatka	Russian Federation	other	No	N	likely Investment
Rwenzori Mountains National Park	Uganda	other	No	N	
The Ahwar of Southern Iraq	Iraq	other	No	C/N	TI / Invest
Sagarmatha National Park	Nepal	other	No	N	
Ashur (Qal'at Sherqat)	Iraq	WI	Yes	C	
Everglades National Park	USA	WI	Yes	N	
Niokolo-Koba National Park	Senegal	WI	Yes	N	
Río Plátano Biosphere Reserve	Honduras	WI	Yes	N	
Selous Game Reserve	United Republic of Tanzania	WI	Yes	N	likely Investment
Olympic National Park	USA	Retrospective SoC	No	N	
Mammoth Cave National Park	USA	Retrospective SoC	No	N	
Tropical Rainforest Heritage of Sumatra	Indonesia	other	Yes	N	

Fig. 3: Percentage of natural heritage sites affected by selected impacts

Impact type	1979–2013 Review	2018 42.COM/7	TREND
Mining and Oil & Gas	49	49	same
Water infrastructure	21	24	UP
Livestock farming	22	22	same
Ground transportation	29	20	down
Land Conversion	22	20	down
Major visitor accommodation and associated infrastructure	18	16	down

Fig. 4: Water Infrastructure and related risks as represented in the SoC Database for 2013-2018.

Impact type	Records in SoC DB	Number of World Heritage sites	Number of countries	Comment
Water infrastructure (WI)	93	29	24	SoC DB incomplete (see 2018 table below)
Renewable energy	26	11	10	most frequent impact from geothermal projects
Linear utilities	20	9	8	
Water withdrawal	20	8	7	overlap with WI by half
Non-RE energy	12	4	4	2 sites overlap with WI

Encroachments on conservation areas grow because rivers are an increasingly scarce resource with many competing values and interests attached. Remaining free-flowing rivers are being rapidly affected and destroyed by new dam projects. Freshwater biodiversity features disappear twice faster than terrestrial or marine populations of wildlife. Add to this that free-flowing

rivers are yet to be adequately represented on the World Heritage List. Dam impacts are usually irreversible, and expansion of industrial development relies on power and water sources, explaining why 30% of natural sites of Heritage in Danger are those impacted by dams, and why many of these cannot be rehabilitated.

One would wonder why today, when viable renewable energy alternatives are plentiful and hydropower (along with nuclear) is the most expensive generation type to build, there are no adequate world-wide rules and measures to protect remaining freshwater biodiversity from being dammed.

A first root cause may be that support to hydropower and large water infrastructure is rooted in political preference given to mega-projects – a preference often associated with corruption and poor governance (NCEA 2017). But another root cause is the distorted development planning process, where assessments and decisions on environmental responsibility are only made too late, at the last stages of planning processes, when little could be changed. The third possible cause is a lack of holistic thinking at institutions coordinating global environmental governance, so that each of them addresses its own small subset of the 2030 SDGs, exacerbating competition between key societal needs and objectives. Continuing support to hydropower by UN institutions on the grounds that it is “green energy” is an example of this alarming trend (Shapkhaev & Simonov 2018).

The UNESCO World Heritage Committee discussed the problem and recognized that World Heritage is threatened by “large-scale development projects including dams, extractive industries and transportation infrastructure, located both inside and outside their boundaries” and requested that those “are assessed through Strategic Environmental Assessments (SEAs) at an early stage in the development of the overall project, before locations / routes have been fixed and prior to any approvals being given” (42 COM 7).

We want to suggest several measures to assist implementation of these decisions:

Timeliness of implementation of specific decisions

The lack of timely implementation of decisions taken by the WH Committee in past sessions results in increased threats and damage to WH properties. These, for example, include cases in the Russian Federation, which failed to complete several requested EIAs, such as one on water level regulation in Lake Baikal⁴, and the Lower Omo River Valley in Ethiopia threatened by impacts of the Gibe III Dam². Both cases illustrate delays and non-compliance by States Parties.

There are many pending Committee decisions prescribing complete and comprehensive SEA / EIAs on water level / flow regulation impacts and the requirement to design property-wide ecological monitoring systems related to infrastructure projects.

Strategic Environmental Assessments (SEAs) should be pre-emptively applied on all World Heritage sites that could be threatened potentially by energy and water infrastructure projects. It is advisable that the World Heritage Committee specify reasonable specific deadlines for such assessments. It also makes sense to request an SEA (at least scoping for potential threats) as part of management planning for new World Heritage properties. This will harmonize and limit inconsistencies in the application of WHC recommendations by providing for compliance mechanisms for practical enforcement, thereby reducing the rate of non-implementation of WHC recommendations.

Additionally, it is necessary that any State Party planning or permitting large project investments in a basin where a World Heritage Site is located, should, at the earliest stage of planning, notify the World Heritage Center on the nature of the planned investment and whether, in the Party’s opinion, it may affect the Outstanding Universal Value (OUV) and thus require an SEA.

Addressing transboundary impacts

Many sites affected by water infrastructure (25% in 2018) are threatened across the border by infrastructure built in other countries, often ignoring Article 6 of the Convention. Countries such as Turkey⁵, Ethiopia, Bhutan, Mongolia, Kenya, Brazil and Panama are operating, developing or planning dams which may threaten World Heritage in adjacent countries. It is suggested to use Article 6 to act pre-emptively rather than reactively, asking parties to assess potential transboundary impacts on World Heritage routinely while doing basin management planning.

Insufficient investment safeguards

The Convention bodies and civil society should reach out to financial institutions partnering with States Parties in water infrastructure projects which may potentially lead to degradation of the OUVs of heritage sites. Some national and international finance institutions (IFIs) have already included wording on avoiding harm to World Heritage in their adopted or proposed⁶ policies. However, it seems advisable that the Committee adopts a decision addressing financial institutions established by convention parties, recommending that they adopt the wording of the Decision 40 COM 7 as a minimal requirement for safeguarding heritage sites from impacts of water infrastructure. Good IFI practices should be showcased, as for example, the case with the China Export-Import Bank which, in consultation with the State Party, reallocated to alternative development projects a US\$1bn loan for Egiin Gol Hydro after learning that its potential harm to Lake Baikal World Heritage had not been properly assessed and discussed with World Heritage agencies (Simonov 2016).

⁵ See 2018 WHW Forum Resolution on Ahwar of Southern Iraq

⁶ E.g. see “EIB Environmental, Climate and Social Guideline on Hydropower” undergoing public consultation till July 7, 2018

⁴ See 2018 WHW Forum Resolution on Lake Baikal

Need to streamline and support pre-emptive early use of the SEA tools.

By Decision 42 COM 7 the Convention effectively calls on States Parties to support timely basin-wide SEAs before decisions on any water infrastructure projects are taken which may be planned in a basin containing a World Heritage property. And this requires site-specific follow-up by Convention bodies. For example, in 2018 the World Bank is supporting an SEA of basin-wide river management and hydropower plans in key basins of Nepal (WECS 2016). Given that most of 400 hydropower proposals are concentrated in the Gandak (Narayani) River basin – with the Chitwan National Park World Heritage Site in its downstream section – it is necessary to ensure that individual impacts of planned large dams (e.g. Budhi-Gandaki) and cumulative impacts of all approved and projected hydropower on the World Heritage sites in Nepal are assessed before decisions on dam construction are taken. Such strategic assessments must incorporate a fair analysis of technological alternatives, especially now that hydropower is losing relative advantages to other types of renewable energy generation.

The Committee should increase the capacity of its Advisory Bodies to provide technical support on SEA design and implementation and to strengthen oversight on compliance to achieve effective results. One simple form of guidance could be commissioning the development of case studies on well-implemented SEAs to inform parties involved about best available practices.



Fig. 5: Budhi Gandaki River at a planned reservoir upstream from Chitwan National Park

Coordination between and within conventions and international organizations on climate change policies to promote nature conservation and prevent destruction

There is an acute need for coordination between the World Heritage Convention, the Bonn Convention, the CBD and other environmental conventions on one side and the Secretariat of the UN Framework Convention on Climate Change (UNFCCC)

on the other, to ensure that adaptation and mitigation measures do not have any harmful impacts on World Heritage Sites and other areas of outstanding natural value.⁷ This is an urgent matter since some States Parties have already included hydropower development potentially damaging to World Heritage as part of their initial Nationally Determined Contributions (NDCs) under the Paris Agreement⁸. Those NDCs include such examples as hydropower threatening Lake Baikal, dams upstream from Chitwan and Manas National Parks, as well as dams destroying the immense biodiversity of the Mekong River.

In May 2019 UNESCO plans to host the International Hydropower Congress in Paris, which will promote hydropower as a “climate solution”. We hope that UNESCO can at least ensure that a special session of that Congress open to Civil Society Organizations (CSOs) non-members of the International Hydropower Association is organized to examine issues raised in this paper. We urge UNESCO as a whole and the World Heritage Centre in particular to use this Congress to oblige major hydropower construction companies (usually state-owned), international finance institutions and States Parties to explicitly commit to robust safeguard measures to stop hydropower encroachment on World Heritage Properties and on other valuable natural areas, as well as to assess and mitigate impacts of existing hydropower facilities when they share basins with World Heritage sites.

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⁷ 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

⁸ See 2018 WHW Forum Resolution on Lake Baikal

Shadow Report on the State of Conservation of the World Heritage Property Białowieża Forest

Prepared by a NGO Coalition of ClientEarth, Wild Poland Foundation, Greenmind Foundation, Greenpeace Poland, Polish Society for the Protection of Birds (OTOP) – BirdLife Poland, Workshop for All Beings, WWF Poland



Following a large extension of the Polish – Belarusian Białowieża Forest World Heritage Site (inscribed in 2014), the entire Białowieża Forest (a property of 141,885 ha with a buffer zone of 166,708 ha) is on the World Heritage List.

At the time of submission of the nomination file, the State Parties fully undertook to manage the site in line with the adopted Statement of Outstanding Universal Value, which should be considered as the key reference for future effective protection and management of the property. The nomination file was supported by both States Parties, including their management authorities (administration of National Parks and forest management units).

The nomination file clearly identifies management objectives and the measures allowed on the site, its conservation zones and the buffer zone. These were fully consistent with the OUV, and stated that “undisturbed wild nature is a basic principle for management” and that “**timber exploitation for economic purposes is banned**”. As for the buffer zone, the underlying management objective was determined to be: “human interference is allowed in the form of protection measures in order to restore the state of ecosystems and the components of nature to the conditions closest to natural or to preserve natural habitats and habitats of plants, animals and fungi”.

When the decision was made to extend the site (38 COM 8B.12), the World Heritage Committee requested that the two States undertake several measures related to management and governance, and in particular to **expedite the preparation and further official adoption of the integrated management plan** for the property, addressing all key issues concerning the effective conservation and management of this transboundary property. Subsequent decisions of the World Heritage Committee (40 COM 7B.92 and 41 COM 7B.1)

- a) reiterated requests to expedite preparation of the Transboundary Management Plan;
- b) requested to maintain the continuity and integrity of protected old-growth forest in Białowieża Forest and measures to ensure that no commercial timber extraction is permitted within the entirety of the Polish part of the property;

- c) requested the States Parties to submit an updated State of Conservation Report **with a view to considering in case of confirmation of ascertained or potential danger to Outstanding Universal Value, the possible inscription of the property on the List of World Heritage in Danger**.

This report responds to these decisions of the World Heritage Committee and summarizes the most recent trends and developments concerning the state of conservation and factors affecting the property, building upon the information gathered by NGOs and independent scientists. When examining the progress related to implementation of the decisions of the World Heritage Committee as well as assessing the overall state of conservation of the property, this report also takes into consideration findings and recommendations contained in the report from the IUCN Advisory Mission to the World Heritage property “Białowieża Forest” in June 2016.

The decisions of the World Heritage Committee and recommendations from the IUCN mission are not being implemented. Strikingly, only two months after the Committee session the State Party announced the start of increased logging in the Białowieża Forest district.

The data on logging is dramatic and shows that the State Party of Poland is **systematically transforming the best preserved old growth forest in Europe into a commercially exploited one**. There is an indication that despite unprecedented timber extraction, commercial logging is going to continue.

The Białowieża Forest WH site, lacking a “management plan or management system” fulfills the prerequisites for **inscription on the List of World Heritage in Danger**. The future of the Białowieża Forest is uncertain and under continued threat.

The root causes of the problem – an **ineffective governance mechanism**, negatively fuelled by the influence of State Forests (SFS), and **lack of political will and technical capacity** of the authorities to deal with the property’s management and gov-

ernance, need to be addressed as a matter of priority to make sure that the property remains in the state as prescribed by the requirements of the Convention.

Urgent and determined action is required to reverse the trend of destruction. In the opinion of non-governmental organizations, independent scientists, as well as a large part of concerned Polish and international society, the best way to achieve long-term sustainable management are the proper implementation of the requirements of a World Heritage and Natura 2000 site and subsequent **enlargement of the National Park for the entire territory of the Forest.**

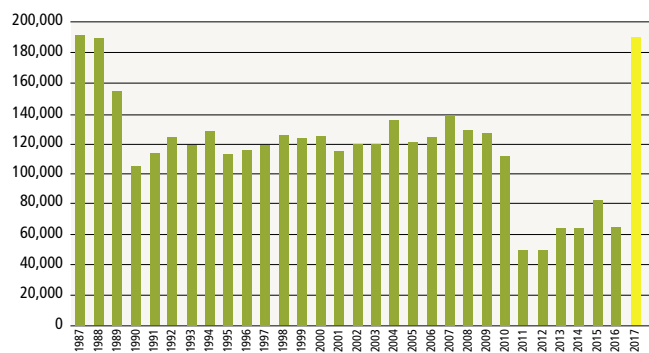


Fig 1: Commercial timber extraction in the Białowieża Forest 1987–2017 [m³]

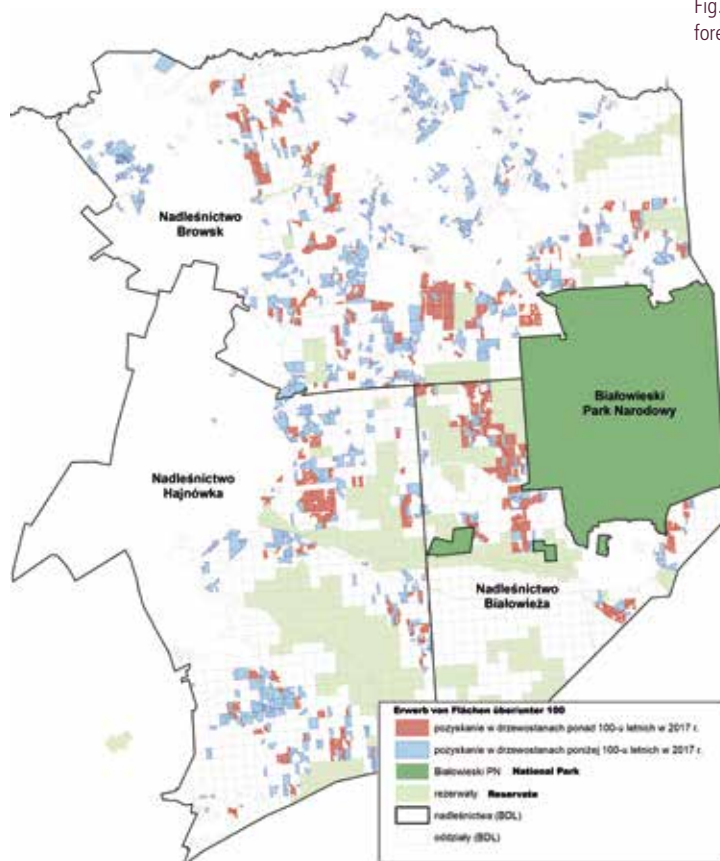


Fig. 2: Forest sections that were affected by timber extraction in 2017 in old-growth forest stands of over 100 years old (red) and below 100 years (blue). The National Park is marked in dark green and nature reserves in light green

Key findings:

- In the year 2017 alone, commercial timber extraction reached **unprecedented levels of 190 000 m³**.
- Most logging operations were carried out in the most **valuable old-growth forest stands over 100 years old**. (Fig. 2)
- Logging caused **massive destruction and deterioration** of habitats of saproxylic invertebrates and affected breeding areas of birds particularly important for the Białowieża Forest (Fig. 3).



Fig. 3: *Boros schneideri* larvae on dead spruce log prepared for removal from the forest.

- Timber extraction in 2017 **violated agreed management regimes for an UNESCO WH site**, as it was carried out in the 3rd management zone ("partial protection II") where any timber extraction is prohibited.
- Approximately 90% of logged and removed trees were **spruce trees that were already dead** with no presence of bark beetle.
- Logging operations in 2017 **significantly decreased dead wood storage** in the managed part of the Białowieża Forest.
- The Transboundary Steering Committee and the Steering Committee between the National Park and the Forest Administration in Poland and its coordination group **are not functional**, which results in **lack of involvement of key stakeholders** such as NGOs, scientists and local communities.
- The Polish Ministry of the Environment **does not treat the preparation of the Integrated Management Plan as a priority** and has not undertaken any substantial efforts to expedite the development of this plan.
- Local communities and other stakeholders **were not involved** in any preparatory work related to the Management Plan for the Białowieża Forest Transboundary World Heritage Site.

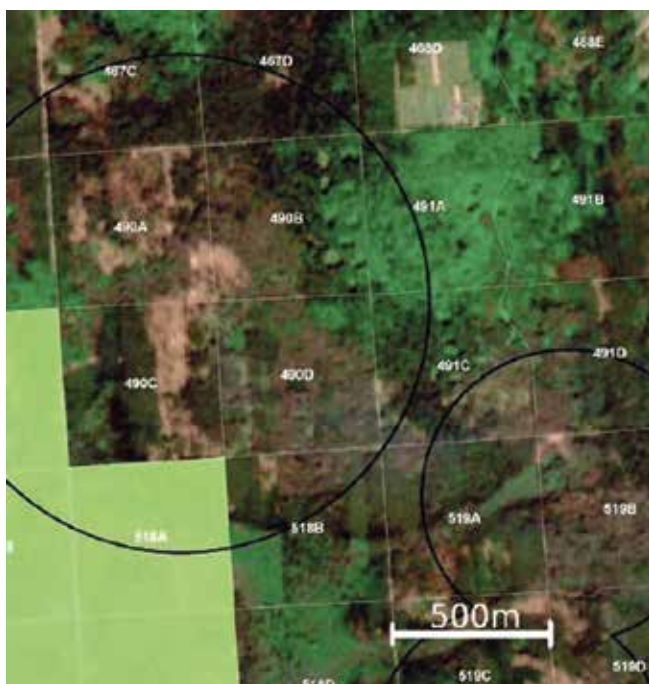


Fig. 4: Satellite image showing plots affected by large-scale clear cuts

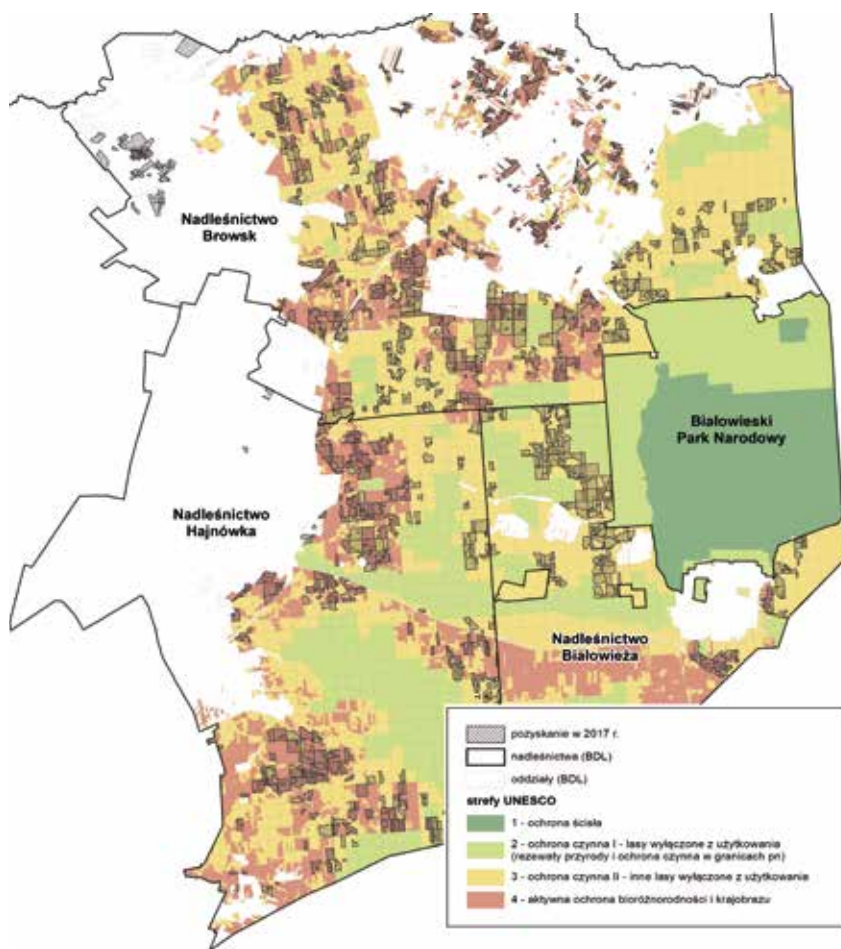


Fig. 5: Forest sections affected by timber extraction in the III and IV UNESCO management zones in 2017 (zones: I – dark green; II – light green; III – yellow; IV – red)

- The current management model **does not include stakeholder participation**, which results in a general **lack of understanding of the principles** behind the World Heritage site and its management. To raise awareness and build trust, a
- **Local tourism-related businesses** suffered in Spring 2017 when large parts of the Forest were **closed for entry** and started to be patrolled by forest guard and the police (Fig. 6).

long-term stakeholder engagement programme needs to be implemented.

- The State Party of Poland did not prepare **any proper evaluation** of potential impact of the amendments to the Forest Management Plan (FMP) on the Białowieża Forest World Heritage site.
- The State Forests holding **does not acknowledge** the reasoning that preparation of any plans that may affect the property and its OUV should be preceded by preparation of an Integrated Management Plan.
- In December 2018, the **State Forests announced that it intended to annex existing forest management plans and increase wood extraction limits, and in consequence allow for commercial timber extraction of a total of 171 000 m3 in the next three years.**
- **No actions** have been undertaken by the State Party of Poland **to improve the quality of governance of the WH property and to involve all stakeholders** in the decision-making process.

- **No progress** has been made by Polish authorities regarding the **vision for sustainable development** for the Bialowieza Forest region or **awareness-raising** regarding the value of the Bialowieza Forest.
- Despite the fact that the State Forests Holding and Bialowieza National Park are formally members of the World Heritage Property Steering Committee, **little or no exchange of information and knowledge** takes place between these two institutions. Effective mechanisms for the involvement of local communities, NGOs, the research community, experts, and other major stakeholders **practically do not exist**.
- **No action** was undertaken to date to address the IUCN recommendation on a clear definition and technical guidelines for “**sanitary cuttings**” and “**safety measures**”.
- The IUCN recommendation on stakeholder involvement in the **development of a Forest Fire Prevention and Suppression Plan** was **not addressed** as the draft document was prepared without stakeholder participation.
- The logging **does not serve the needs of local communities** as they are often faced with deficits of timber at the local market.



Fig. 6: Forest plots closed for entry.

Source: State Forest Service



Fig. 7: Civil disobedience against the closure of the forest. Note the yellow "no entry" sign.



Fig. 8: Roadside barriers installed on the newly-paved Narewowska road, December 2018

- State Forest practices caused **mobilization of a social movement opposing** their actions. The authorities, especially State Forests and the police, responded with **large scale repressions** (Fig. 7).
- The State of Conservation Report **by the States Parties** states that Polish State Forests do not carry out commercial logging, whereas the State Forests **admit openly to a plan to continue commercial timber extraction** from the property.
- The State Party of Poland has stated that work is under-way to prepare the Integrated Management Plan, and that an expert team has been established to prepare recommendations for its development. This **is contrary to the IUCN recommendation** stating that the plan should be worked out **collaboratively with the local communities and stakeholders**.
- **Ecological connectivity has deteriorated** since the **Narewowska Road**, located in the zones of partial protection I and II, is being rebuilt. **No proper environmental impact assessment** has been carried out for the project (Fig. 8).
- When **the timber extraction quota** for a 10-year period was reached, the Forest Districts of Browsk and Hajnówka **requested an amendment of the Forest Management Plans to allow continued logging**. This is yet another instance in which the State Forests refuse to acknowledge the argument that preparation of any plans that may affect the property and its OUV should be **preceded by preparation of an Integrated Management Plan**.

This paper is a reprint of the preface and executive summary – with minor technical edits – of a report of the same name. The full report can be accessed at https://www.wwf.pl/sites/default/files/2019-04/raport_bialowieza%20v2.pdf. All figures are © WWF unless indicated otherwise. The editor

New Threats to the World Natural Heritage in Russia

Mikhail Kreyndlin, Anna Podgorodneva,
Igor Glushkov, Greenpeace Russia



On November 2, 2018, the Ministry of Economic Development of Russia published a draft federal law concerning the amendments to the Land Code of the Russian Federation and a number of legislative acts (for the purpose of transition from division of lands into categories to territorial zoning). This draft is a serious threat to the Russian unique system of protected areas, which was 100 years old last year.

According to article 57 of the draft, starting from the day of official publication of the present Federal law and until the 1st of July 2023:

- Executive bodies governing the protected areas of federal or regional importance should demarcate the boundaries of above-mentioned territories, excluding from them areas which do not have conservation value: lands occupied by settlements, linear structures, industrial buildings, sub-soil objects and other similar constructions, whose presence and exploitation do not correspond to the purpose of the establishment of protected areas;
- Land plots which earlier belonged to conservation areas, which are used for agricultural purposes and are not part of the forestry assets (forest park) or protected areas, should be included in agricultural zones.

These statements mean that significant territories occupied by settlements, roads, power supply lines, mineral deposits and agricultural lands, will be excluded from the boundaries of protected areas (including state nature reserves and national parks), which will inevitably lead to their fragmentation and degradation.

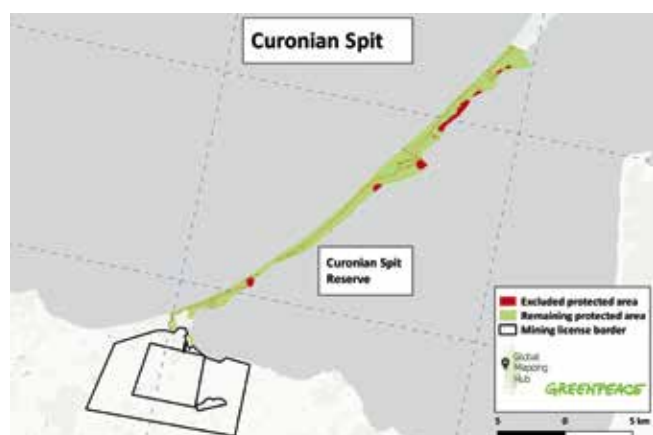


Fig. 1: Curonian Spit: from the Curonian Spit can be excluded roads, power supply lines and settlements.
Map: Greenpeace

It is totally unclear by which criteria it will be determined that some objects do not have conservation value, whose exploitation does not correspond to the purposes of establishing a protected area. Meanwhile, it is likely that a significant number of conservation areas will lose their value and will not be able to fulfill their functions in case mineral deposits are excluded from their territory. It is also unclear which agricultural lands should be eliminated and according to what principles.

At the same time, it is vital for many protected areas to have linear structures (roads) and settlements as they facilitate the implementation of their main functions – protection of nature (including fire safety), regulation of tourism and recreation activities, and preservation of historical and cultural heritage. Following are some examples included in the World Heritage list to illustrate the possible effect of realization of this legislative act.

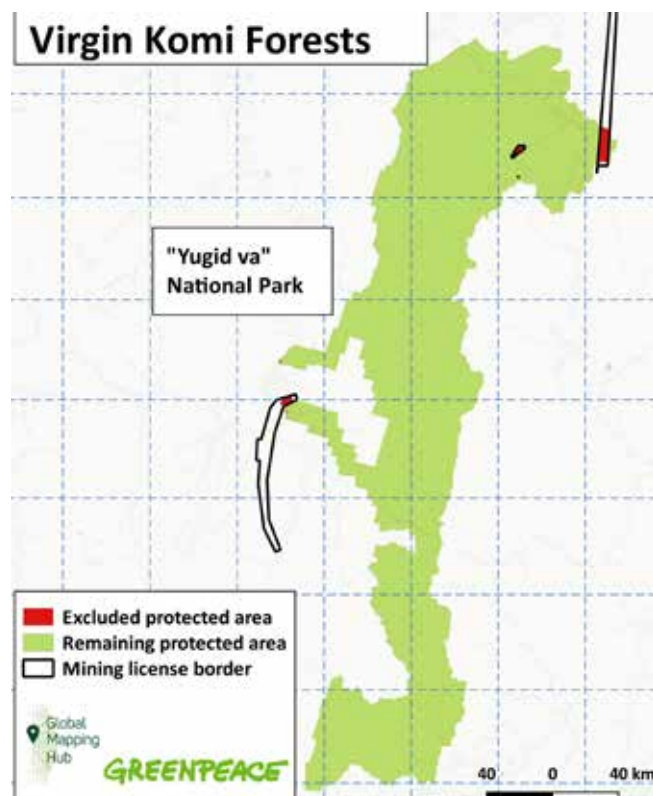


Fig. 2: Virgin Komi Forests: from the "Yugyd va" National Park can be excluded gold deposits and other mineral resource fields.
Map: Greenpeace

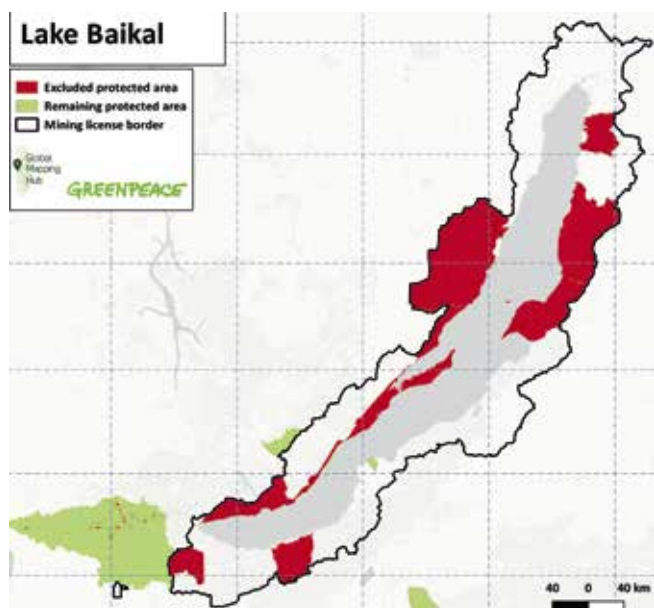


Fig. 3: Lake Baikal: All protected areas are included in the licensed sector for regional geological investigations. Furthermore, Barguzinskiy state nature biosphere reserve, Tunkinskiy, Zabaikalskiy and Pribaikalskiy national parks, Pribaikalskiy, Kabanskiy and wildlife reserves may lose settlements, linear structures, and agricultural lands. Map: Greenpeace

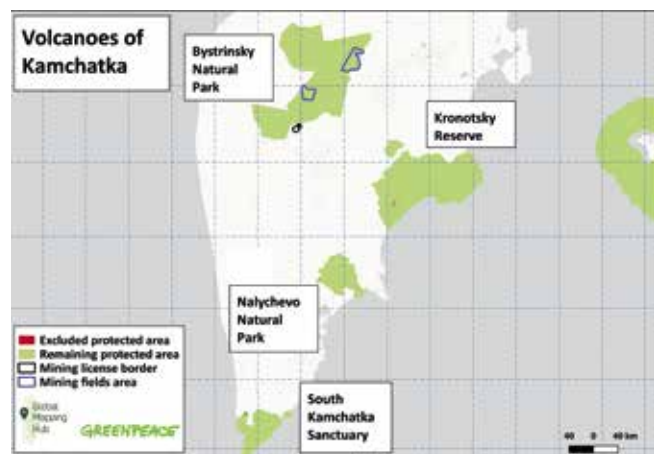


Fig. 4: Volcanoes of Kamchatka: Kronotsky Biosphere Reserve and Southern Kamchatka may have withdrawn linear structures, Bystrinsky and Nalychevo natural parks subsoil objects and linear constructions. Map: Greenpeace

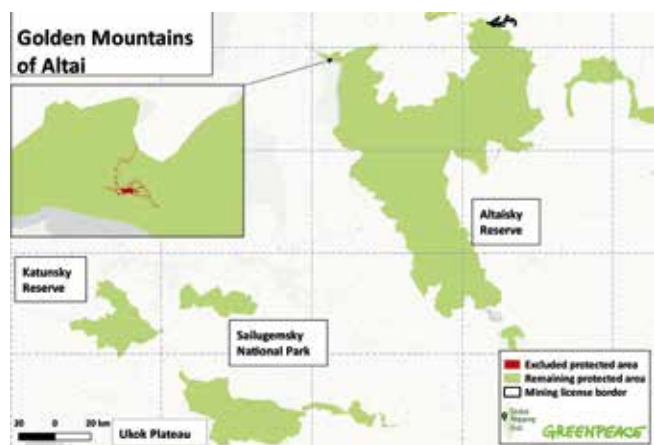


Fig. 5: Golden Mountains of Altai: From the Altaisky Biosphere Reserve can be excluded settlements and linear objects; from the Katunsky Biosphere Reserve linear objects; from the Ukok Quiet Zone nature park agricultural lands. Map: Greenpeace



Fig. 6: Western Caucasus: The Caucasus state nature Biosphere Reserve, the headwaters of the Pshecha and Pshechashcha Rivers nature monument, the Bolshoy Thach nature park can have excluded their linear constructions. Map: Greenpeace



Fig. 7: Central Sikhote-Alin: Subsoil objects can be excluded from the Bikin national park.



Fig. 8: Landscape of Dauria: Subsoil objects can be excluded from the Uvs Nuur Basin state nature biosphere reserve. Map: Greenpeace

The elimination of all these territories from the protected areas will lead to the loss of their integrity, destruction of natural complexes, increase of poaching, wildfires and eventually to the loss of their outstanding universal value.

According to the Operational Guidelines for the implementation of the World Heritage Convention, any modification of the legal protective status of the area is a potential threat to the outstanding universal value of a natural World Heritage property. Excision of the above-mentioned territories will be considered as a modification of the legal protective status of the area. Overall, adoption of this law can lead to the inscription of most Russian world heritage properties in the World Heritage in Danger list. We hope that the World Heritage Committee will pay attention to these new significant threats to the Russian World Heritage properties. Furthermore, the situation concerning other threats to the outstanding universal value of some Russian properties is getting worse (Virgin Komi Forests, Golden Mountains of Altai and Western Caucasus).

Virgin Komi Forests

Judicial decisions on the withdrawal of industrial machinery owned by a Gold minerals company have not been implemented. Multiple requirements by the World Heritage Committee to terminate the license on the development of the Chudnoe field within the borders of Yugyd va have not been put into effect. Meanwhile, the Russian Ministry of Natural Resources and Environment continues to assert that the issue of the development of Chudnoe remains unsolved.

Golden Mountains of Altai

In September 2018 Vladivostok hosted the East Economic Forum. Immediately after its closure, mass media informed that Gazprom and China National Petroleum Corporation CNPC are actively working on a contract concerning the transportation of natural gas by the western pipeline "Altay" (Power of Siberia-2).

This pipeline passes through the Ukok Plateau in the Republic of Altai, which is a part of the UNESCO World Heritage property Golden Mountains of Altai. According to PJSC Gazprom plan, the prospective pipeline will cross the plateau in its central part, passing through the natural park territory. The pipeline

route, by crossing the unique highland plateau with its high level of biodiversity, will inevitably lead to the destruction of the fragile high-mountain landscape and will negatively affect the flora and fauna of the plateau.

Moreover, the pipeline will cross the Russian-Chinese border on the Kanas pass at an altitude of more than 2000 m, which means harsh natural conditions. In order to construct the pipeline in such a difficult environment it will be necessary to carry out extensive construction work which will damage vulnerable mountain landscapes. Thus, the pipeline construction will lead to the destruction of natural complexes on a significantly larger territory than the pipeline route area alone, and will pose a substantial threat to the outstanding unique value of the property.

The Ukok Plateau, according to scientific data, is a habitat for at least five snow leopards – endangered animals protected by some Russian strategic documents, including President Putin's May decrees. Therefore, construction of the pipeline through the Ukok Plateau is not only harmful to the ecosystem but also in contradiction of Russian legislation.

The World Heritage Committee has repeatedly taken decisions that it is inadmissible to build this pipeline, and has demanded the final rejection of the plan. However, Russian and Chinese authorities keep ignoring these demands. It was decided on the 42nd WH Committee session that if Russia did not give up the plan to build the pipeline through the Ukok Plateau, the Golden Mountains of Altai could be put on the List of World Heritage in Danger in 2019. Nevertheless, the Gazprom management keeps saying that negotiations on the Altai pipeline are close to being finalized.

Prime Minister Medvedev also said that the procedure of negotiations with China on the 'Western Route' of the Power of Siberia gas pipeline will be determined in the near future. "I can say that talks on the 'Far Eastern' route are in line with schedules. As regards deliveries over the 'Western Route,' the procedure for holding such negotiations will be agreed in the earliest future. The impetus to such talks will be given at the highest level," the top official said (<http://tass.com/economy/1034056>).

The Western Caucasus – a Candidate for Inscription in the List of „World Heritage In Danger“

Mikhail Kreindlin, Greenpeace,
and Yulia Naberezhnaya, Russian Geographical Society



The situation in the Caucasian Natural Biosphere Nature Reserve (World Natural Heritage Site “Western Caucasus”) and the adjacent areas (Sochi National Park, Sochi National State Nature Reserve, nature monument “Upper Reaches of Pshekhka and Pshekhaskha rivers”).

The Caucasus State Nature Biosphere Reserve, Sochi National Park (except for the areas built up during preparation for the XXII Olympic Winter Games and the XI Paralympic Winter Games in Sochi) and Sochi National State Nature Reserve constitute an integrated natural site of outstanding environmental value. The main threat to this site is the plan to expand the alpine ski resorts of Gazprom and Rosa Khutor into the territory of the reserve and the adjacent territories of the Sochi National Park and the Sochi Nature Reserve.

According to the Russian Federation Government Resolution No. 586-p [6] of March 30, 2017, without any tender, the land plots within the territory of the Sochi State Nature Reserve in the valley of Mzymta river were leased for 49 years in order to implement a large-scale investment project “Development of Krasnaya Polyana Territories for the Purpose of Tourism and Recreation in 2016–2028.” This resolution also applies to the territories¹, which immediately abut the boundaries of the UNESCO World Heritage site. The planned large-scale construction on the boundary of the World Heritage site will inevitably lead to the degradation of the natural systems of the adjacent site section and, as a result, it will lose its outstanding universal value.

It should also be noted that the UNESCO World Heritage Committee has repeatedly paid attention to the state of this site, including the development plans in the upper reaches of the Mzymta river. In its decision 42COM 7B.80 [7], the UNESCO World Heritage Committee has confirmed its position that the construction of large-scale infrastructure on the Lagonaki Plateau or in any other area within this site will serve as the grounds for its inclusion on the “List of World Heritage in Danger”.

The Committee also expressed its serious concern over the lease of the land plot for the development of large-scale investment projects associated with sports and recreational activities which immediately abuts the site, and which is located in the territory of the Sochi Federal Nature Reserve and the Sochi National Park. As a result, the UNESCO World Heritage Committee requested the Government of the Russian Federation not to allow any construction of large-scale infrastructure in the areas which immediately abut the site, especially if they are located in other protected areas, if such construction may have a negative impact on the outstanding universal value of the site which should be assessed within the environmental impact assessment for each proposed project in accordance with the IUCN recommendations on the environmental assessment of World Heritage sites.

Nevertheless, the Ministry of Natural Resources in September 2018 developed and published a draft law “On Amendments to the Federal Law “Concerning Specially Protected Natural Areas” and to the Federal Law “Concerning Ecological Appraisal”, which expands the law passed in 2016, which allows to establish so-called biosphere polygons within the boundaries of biosphere reserves, where the construction of any sports and tourist facilities and related infrastructure is allowed.

In particular, the draft law provides for the authority of the Government of the Russian Federation to determine the general procedure for establishing biosphere polygons within the boundaries of state nature reserves and the criteria for decisions on their establishment.

However, there is a positive fact that an important amendment has been made to the environmental legislation. Federal Law No. 321-FZ [8] dated August 03, 2018, has amended Article 15 of Federal Law “Concerning Specially Protected Natural Areas” [9] which prohibits construction of sports facilities being capital construction facilities as well as associated engineering and transport infrastructure facilities (except for already permitted construction.)

The construction on the land plots provided for by the above resolution, if it has not yet been permitted, is contrary to the law. However, the plans to construct alpine ski resorts which

¹ land plots Nos. 23:49:0800002:2, 23:49:0800002:3, 23:49:0800002:7, 23:49:0000000:7485

got a boost in late 2018 (six Gazprom facilities and the first facility of Rosa Khutor, brought up for public discussion since 2014) evidence that the ski resorts continue to expand, ignoring the changes in legislation. Gazprom has been expanding and reconstructing the infrastructure within the boundaries of the land plots earlier (until 2014) allocated for the Olympic infrastructure at the boundary of the World Heritage Site Western Caucasus (Pikhtovaya Polyana ecosite). Rosa Khutor is actively developing new territories of the Sochi National Park (Aibga ridge, southern slope) having particular value in terms of biodiversity conservation, which had been previously proposed to be included into the Western Caucasus Site in order to optimize the boundaries of the World Natural Heritage site.

Furthermore, a serious threat to the Caucasus Nature Reserve and the UNESCO World Heritage Site “Western Caucasus” is the plan for the construction of a 500 kV overhead high-voltage power line via the territory of the Caucasus Nature Reserve, as well as the construction of motorways across the site, included in the Krasnodar Region Land Use Planning Scheme.² The map of the transport infrastructure facilities provides for the construction of the following motorways via the Heritage site: Chernigovskaya – Babuk-Aul, Partizanskaya Polyana – Babuk-Aul, a combined motorway and railway of federal significance which links Chernorechye lodge and Krasnaya Polyana settlement, as well as the motorway passing via the territory of the Heritage site in the western direction to the border with the Republic of Adygeya.

Active preparation for the construction of a motorway from Kislovodsk to Sochi through the territory of the reserve is taking place. In 2018, the plans got a boost for the construction of motorways through the World Heritage site territory; options for Cherkessk–Krasnaya Polyana motorway passing through the Lagonaki Plateau and the Lunnaya Polyana ecosite are under consideration; the administrations of the Karachay-Cherkessia Republic and the Krasnodar Region are actively looking for investors and coordinating the projects to construct motorways through protected areas with the Ministry of Transport and the Ministry of Natural Resources of the Russian Federation.

Plans for the development of ecological tourism in the protected areas require the expansion of the infrastructure of the alpine ski resorts in the World Heritage Site territory.

In its resolution, the meeting of the Presidium of the Russian Federation President’s Council for Strategic Development and Priority Projects held on April 11, 2017 approved the datasheet of the priority project “The Wildlife of Russia: To Preserve and To See”.³ The Project datasheet is available here.⁴

Clause 1.1. unambiguously says: “A standard form of development programs for specially protected natural areas of federal significance in the field of ecological tourism has been developed in order to provide a uniform approach to the investors’ programs for the development of ecological tourism in pilot specially protected natural areas included in the priority project “The Wildlife of Russia: To Preserve and To See.”

The documents on the development of ecological tourism in the protected areas do not specify the special status of the World Heritage Sites territories. They are subject to the same uniform conditions for ecological tourism development as other protected areas.

The major threat to the Caucasus Reserve and the World Heritage Sites is the very idea of ongoing steady development of so-called “ecotourism” on its territory. The project’s task is to increase the number of visitors, to expand the recreation territories to up to 5 % of the Reserve area, i.e. to approximately 14,000 hectares.

However, already now some areas of the reserve, allocated for tourist activities, are tremendously overloaded. First of all, these are campsites on the most popular and accessible routes. For example, this year about 200 people simultaneously camped near the Imeretinskoye Lake (although the permitted campsite is located a few kilometers below the lake); more than 600 people were recorded at the Bzerpsky cornice. The man-caused load on the natural areas continues to increase around the ski resorts. This includes uncontrolled tourism with the use of vehicles (4 X 4, all-terrain vehicles, snowmobiles, etc.), and the direct destruction of protected landscapes and ecosystems occurring during construction work accompanying the expansion of ski resorts and other recreation facilities.

Moreover, the plans for the construction of a new ski resort on the Lagonaki Plateau directly within the World Heritage site area have not been cancelled (see 38.COM 7B.77) – this is the Lagonaki Biosphere Polygon. According to Resolution No. 603-r dated 04.23.2012 of the Government of the Russian Federation, the construction of ski lifts in the territory of the Lagonaki Biosphere Polygon is allowed. Over the past few years, a motorway to the Lagonaki Biosphere Polygon has been constructed as far as to Mezmay settlement, and a power transmission line has been laid directly to the World Heritage site boundary.

The Biosphere Research Center near Mt. Fisht (Lunnaya Polyana ecosite) in fact continues to expand as a ski resort. Since August, 2018, a motorway to Lunnaya Polyana is being constructed (see Fig. 1 and 2). It passes along the border of the Caucasus Nature Reserve and the territory of the Republican Nature Monument “Upper Reaches of Pshekha and Pshekhaskha rivers”, which is also part of the World Heritage site. The motorway to Lunnaya Polyana, whose construction had been stopped after UNESCO intervention, was almost completed in 2018.

² https://fgistp.economy.gov.ru/?show_document=true&doc_type=npa_ter&uin=03000000020202201808062

³ <http://government.ru/news/27398>

⁴ <http://static.government.ru/media/files/DMHHZWWG2tmwWLZA9E6qk94h-2j9AlcZ9.pdf>

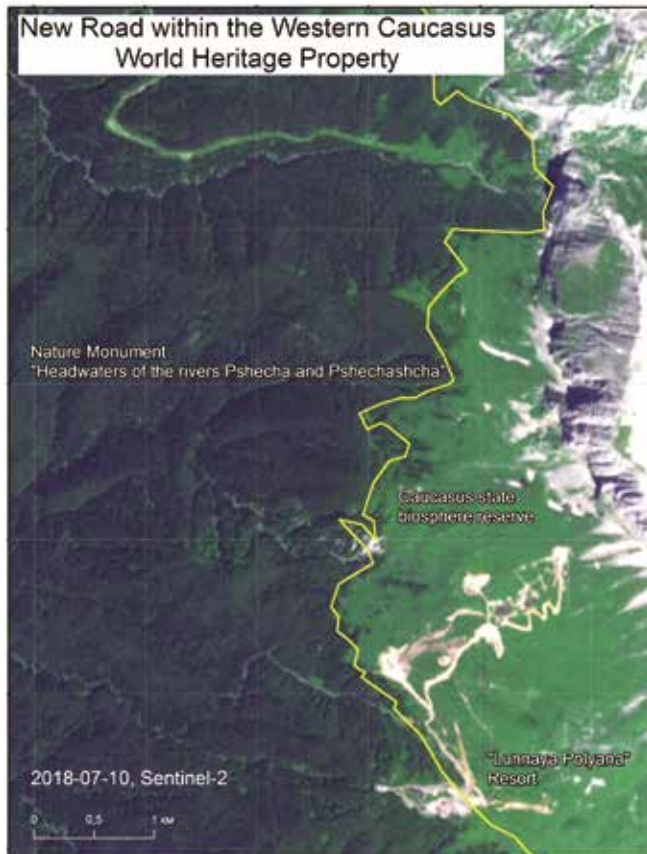


Fig. 1 (July 2018) and Fig. 2 (October 2018) show that a new road has been constructed to the tract Lunnaya Polyana (Mt. Fisht) during the time between the two photos were taken.

Maps: Google Earth / adapted by Yulia Naberezhnaya

Furthermore, a serious problem is still that all the Site areas under the jurisdiction of the Republic of Adygeya except for the Caucasus Nature Reserve have no real protection. The natural monuments and the buffer zone of the Caucasian Reserve continue to operate as forestry since the Site's establishment; legal and illegal logging is carried out annually in their territory. In 2017–2018, new logging was recorded in the territory of the World Heritage Site, in particular within the boundaries of the nature monument "Upper reaches of Pshecha and Pshechashcha rivers."

All these factors evidence that the Western Caucasus World Heritage Site is under threat. In 2017, at the 41st session of the UNESCO World Heritage Committee, environmental conservation organizations already raised the issue of direct threats. UNESCO requested to provide a report on the actual state of the Site in the session's resolution. However, the provided official report does not reflect the real situation. In order to preserve the key values of the Western Caucasus World Heritage Site it is required to:

1. Abandon all plans to construct ski resorts on the Lagonaki Plateau and in the Sochi Nature Reserve, integrate the territory of the Sochi Federal Nature Reserve with the Caucasus Nature Reserve, having canceled the lease agreements with Roza Khutor and its affiliated legal entities pursuant to the Russian

Federation commitments, assumed based on the recommendations of UNEP before the 2014 Winter Olympic Games.

2. Ensure the compliance with the Decisions of the UNESCO World Heritage Committee, which have been given at its annual sessions for ten years since 2008 on transformation of Lunnaya Polyana ski resort into a real research center.
3. Expand the Site territory with the Psebay regional faunal area, which also pursuant to the Russian Federation pre-Olympic commitments must be transferred to the Caucasus Nature Reserve.
4. Enhance the legislation in terms of protected areas and the control over its enforcement.
5. Establish an integrated system of the area's protection and management, develop comprehensive plans for management and monitoring of the state of the key values.
6. Exclude from the Krasnodar Region Land Use Planning Scheme⁵ the plan for the construction of a 500kV overhead high-voltage power line via the territory of the Caucasus Nature Reserve, as well as the construction of motorways across the site territory.
7. Inscribe the property in the List of World Heritage in Danger.

⁵ https://fgistp.economy.gov.ru/?show_document=true&doc_type=npa_term&uin=03000000020202201808062

Landscapes of Dauria – How to Prevent a Water Management Crisis?

Sukhgerel Dugersuren and Eugene Simonov,
Rivers without Boundaries International Coalition



The Dauria steppe is a highland region in the East of the Eurasian continent, and many rivers flow out across its borders. These rivers are of high ecological value and support globally important natural heritage sites: the Selenge River – the main source of Lake Baikal, the Onon – the largest tributary of the Amur River, the Kherlen flows into the Dalai Lake Ramsar Wetland, and the smallest watercourse – the Ulz River – is draining into the endorheic Torey Lakes located in the World Heritage property “Landscapes of Dauria” inscribed in 2017. The new World Heritage property straddling the Russia/Mongolia border represents an outstanding example of the Daurian steppe ecosystem containing substantial and relatively undisturbed areas of different types of steppe, ranging from forest to grassland, as well as many lakes, wetlands and river floodplains. Cyclic climate changes with distinct wet and dry periods lead to high species and ecosystem diversity which is globally significant and offers outstanding examples of ongoing ecological and evolutionary processes. (World Heritage Committee, 2017).

The trilateral Dauria International Protected Area (DIPA) was founded here at the junction of the borders of Russia, Mongolia and China in 1994 through the combination of four separate protected nature areas. The creation of this trilateral protected area, consisting of functionally connected wetland and steppe habitats, is of high importance for biodiversity conservation in Dauria, in particular for the protection of migratory birds and mammals. Besides biodiversity and ecosystem conservation, an important function of the international protected area is monitoring and scientific study of natural processes and phenomena in the Dauria steppe ecosystem. (Kiriliuk et al, 2013)

Cooperative activities of DIPA have focused on joint inventories of flora and fauna within the reserves. Since its establishment, more than 300,000 km² of the region have been investigated. This enormous tri-national survey has been a great opportunity to acquire data on biodiversity and distribution of rare species, define conditions of regional ecosystems, and also to identify key areas for the conservation of endangered species and plan conservation measures. Those included: (i) an interconnected multi-level regional network of protected areas; (ii) programs for conservation of critically threatened species, and; (iii) integration of economic development planning with conservation planning to achieve sustainability.

World Heritage designation is the next major step forward in the region’s conservation. Unfortunately, the Chinese partners at the time of preparing the nomination were not ready to join, but in 2018 their part of the Daurian Steppe was put on their Tentative List under the title “Hulunbeier Grasslands”. The total size of the bi-lateral property is 912,624 ha, while the buffer zone forms an additional 307,317 ha. Out of the total nominated property, 310,509 ha are included in the Daurysky Zapovednik and Valley of Dzeren Federal Nature Refuge in Russia, and

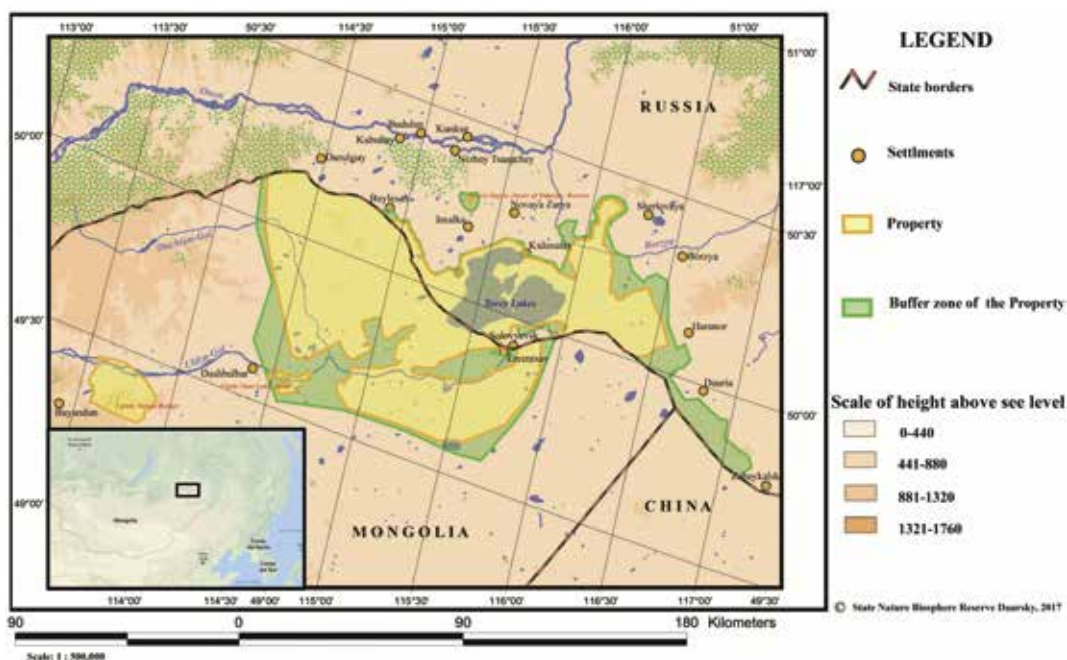


Fig. 1: Official map of the “Landscapes of Dauria”

Source: WHC 2017 / insert by WHW

the Mongol Daguur SPA and Ugtam Nature Refuge in Mongolia. The remaining 602,115 ha is composed of buffer zones of the Daursky and Mongol Daguur Biosphere reserves.

Although the natural ecosystems of the area have experienced relatively little human impact, the nomination documents still identify many problems to be resolved such as overgrazing, frequent fires, hunting of birds, poaching, and fences blocking the migration routes of the Mongolian gazelle. However in the long-term the greatest challenge is competition for scarce water resources exacerbated by climate change.

The Ulz river basin in Mongolia occupies less than 9,000 square kilometers and is the main tributary of the endorheic trans-boundary basin of the Torey Lakes. The Ulz River has an extremely uneven flow, and in dry phases of climate cycle the river does not reach the Torey lakes for several years in a row. Lakes go dry, and their bottom gradually turns into pasture for gazelle and horses until the next flooding, which may be delayed for 10 years and more.

The WH property is located off the main transportation routes, which helps to limit development of settlements and industries. Cattle breeding, crop farming and mining are the main economic activities. Water use in the Russian part is insignificant, comes from groundwater and is largely confined to the Solovievsk border crossing and Kulustay village. There are no known plans to increase water consumption in the Russian part of the Torey Lakes basin.

In Mongolia a recent baseline study by UNDP shows that water consumption is expected to increase 3 times in the river basin from 2011 to 2021. In 2010, consumption by mining was 3,6 million cubic meters or 71% of the total water use; and it would be 12 million cubic meters or 82% of total use in 2021. Studies have shown a high vulnerability of mining sector water supply

to climate change. A water balance calculation of the Ulz River basin shows that 1.4 million m³ water is used for livestock water supply in 2012, and will increase to 2,5 million by 2021 (GEF UNDP EBA Project, 2014). The remaining 2% are divided among irrigation and household use. In 2016 a new water pumping station for a large irrigation project was under construction near the Dashbalbar settlement immediately upstream from then proposed World Heritage property.

Mining is a dual threat to the quantity and quality of water flowing to the WH site. During the preparation of the nomination, Strahm and Vasiljević (2014) noted that mining operations had intensified in the areas inside and adjacent to WH buffer zones in the soums (counties) of Gurvanzagal and Dashbalbar. Two active copper-mining licenses belong to the Chinese-Malaysian BHM LLC company, which according to the Computerized Mining Cadastre System of the Mineral Resources Authority of Mongolia¹ has production facilities in the WH buffer zone at the junction of the Duchiyn and Ulz rivers. However, there is no up-to-date information if these mining operations have been active in 2018 and if yes, how they may affect the WH property.

In June 2015, IUCN received a letter signed by the Deputy Minister of Environment, Green Development and Tourism of Mongolia with assurances of complying with the requirements on absence of mining operations in the WH property and its buffer zone. The Mongolian State Party noted that Mongolian Law does not prohibit mining in protected areas, but that the legislation of Mongolia recognizes the priority of international agreements together with conventions and programs ratified by the country over the national legislation. This should guaran-

¹ CMCS – Computerized Mining Cadastre System of the Mineral Resources Authority of Mongolia <https://cmcs.mrpam.gov.mn/node/4?language=en>

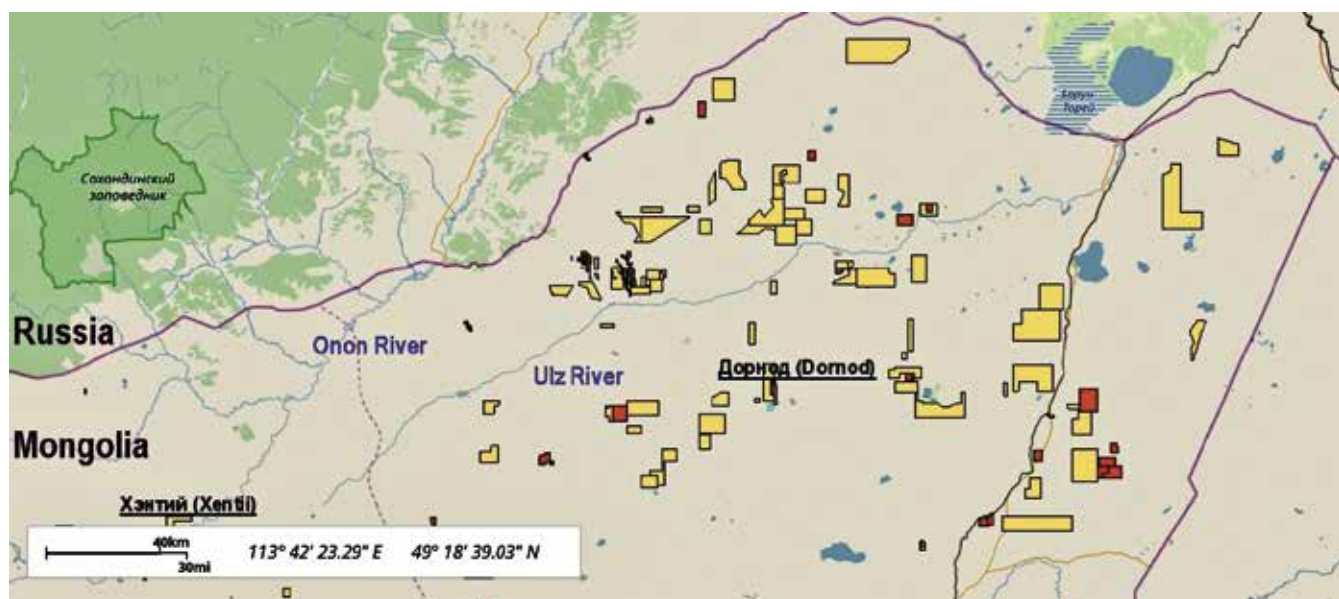


Fig. 2: Ulz Basin mining (orange) and exploration (pale yellow) licenses in November 2018.

Source: CMCS

tee that no mining operations would occur in the WH property (IUCN, 2017).

We compared the number of licenses in Ulz River basin in early 2017 with that in November 2018 and noticed a slow but steady decline in exploration licenses, which has been a nation-wide trend in the recent decade (once up to 70% of the country was covered by exploration licenses). The CMCS map in 2018 testifies that since 2010 the number of licenses decreased at least by half, but at least 2 exploration sites proceeded into the mining phase.

Presently mining is the most important water-consuming sector in the Mongolian part of the Ulz river basin. It also has been the most widespread source of river pollution in Mongolia, which resulted in clashes between local herders and miners all over the country. This is especially dangerous in the Ulz river basin where dramatic drought cycles regularly create extreme natural water deficits. Presently mining threats in Mongolia are manifested in many specific ways:

- In 2017 UNHRC Rapporteur Knox in a special report warned Mongolia against launching the “Gold-2” program aimed to again increase placer gold mining operations (Knox, UNHRC 2018).
- Protection zones along rivers and forests and in headwaters instituted by the famous “Law with Long Name” (2009) are not explicitly shown on the CMCS digital map and are not fully observed.
- The World Heritage property and its buffer zone are not shown on the CMCS digital map.
- Many areas within the WH property are explicitly marked as “areas open to mineral exploration” on the CMCS map, thus allowing any company to start prospecting there;
- In 2017 a foreign mining company proposed an interbasin water transfer to deliver water from the Onon River to the drying Ulz River to support mining, ore processing, as well as agriculture and “environmental needs”.

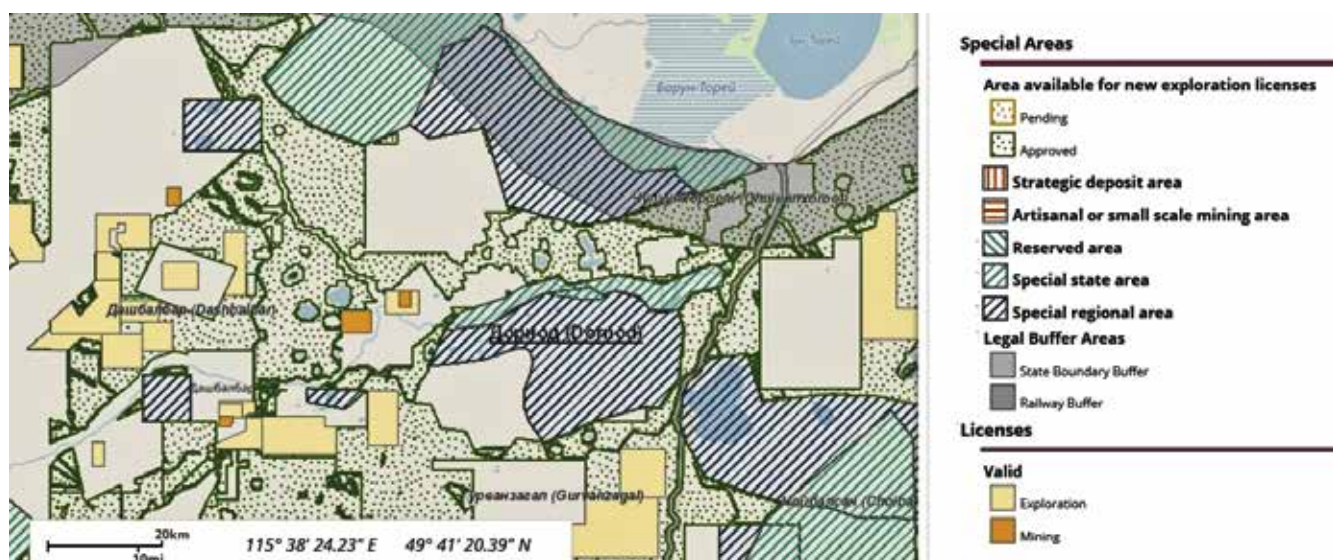


Fig. 3: Areas on the CMCS map within the WH property are not shown as protection zones and are explicitly marked as “areas approved for licensing for exploration”. Source: CMCS 2018

Despite growing mining problems, the most immediate threat to the Ulz river and the WH property is still overgrazing. Since the peatlands at headwaters and wet floodplain meadows of the Ulz are used by livestock during ever increasing drought periods, a serious loss in the water-retention capacity of natural ecosystems is expected by wetland scientists (T. Minaeva et al., 2016). Fencing was suggested as protective measure from overgrazing sensitive wetland areas, which is yet to be implemented at necessary scale to prove its effectiveness (Simonov and Wickel, 2017). Overgrazing is not confined to headwaters and is known to occur both in Russia and Mongolia causing competition and conflicts between local herder communities and Mongolian gazelle. Thus by November 2018 several large herds of gazelle were forced to migrate across the border due to a lack of grass in the Mongolian part.

In 2017 and 2018 at bilateral talks, the Mongolian side officially informed their Russian counterparts that in order “to protect crane habitat” and the “ecological integrity of the Torey lakes” there is a need to study the feasibility of an interbasin water transfer from the Onon to the Ulz river. Russian scientists expressed concern that an augmentation of the Ulz River flow will lead to unnatural changes in ecosystem dynamics, for example, providing water flow during a dry phase when it is naturally absent. Mongolian scientists argue that in increasingly dry conditions endangered cranes and other wildlife may benefit from more even water supply if it is artificially secured. No specific plan was available for an assessment of impacts. In November 2018 the topic was discussed in a Russian-Mongolian environmental cooperation meeting, and the resulting document contains a clear statement: “Both parties take into consideration

that maintaining a natural fluctuation of the water regime is a necessary condition to satisfy the criteria which led to UNESCO inscribing the area in the List of World Heritage Sites" (Commission on Environmental Cooperation 2018).

We can suggest the following additional measures which if implemented in the near future would further reduce the probability of negative impacts from mining and water infrastructure:

1. Develop and enforce as a part of WH management planning science-based Environmental-Flow Norms that guarantee the delivery of a sufficient flow and sediments to the WH site in various phases of the climate cycle;
2. Regulate mining development in the Ulz-Torey basin using findings of assessment and valuation of vulnerability and risk for water resources due to climate change (GEF UNDP EBA Project, 2013)
3. Protection zones delineated according to the "Law with Long Name"(2009), as well as boundaries of the World Heritage property and its buffer zone should be shown on CMCS digital maps of the Mineral Agency of Mongolia and all other state-supported databases in both countries;
4. Russian authorities should develop a specific water monitoring and management system for their part of the Torey Lakes basin, which is practically absent in current schemes for water protection and management.
5. A Joint Mongolian-Russian Ulz River Basin Management Council should be instituted to ensure coordination in river basin management and joint management of the World Heritage property.
6. Increasing water use efficiency should become a priority for development plans in the Ulz River basin;
7. Joint management planning for the WH property and transboundary basin should be focused on ecosystem-based adaptation to climate fluctuations. A basis for this work already exists in both countries in the form of the GEF-UNDP-EBA Project completed in Mongolia, and a special research program on climatic implications for ecosystems and land-use undertaken by the Daurian Biosphere Reserve in Russia (Kiriliuk et al, 2012).

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The Mud Volcanoes of Azerbaijan – a Potential UNESCO World Heritage Site

Hartmut. E. J. Müller



Fig. 1: A bubbling mud volcano.

Photo: Hartmut E.J. Müller

As a part of the Caucasus Eco-region, Azerbaijan is rich in highlights of nature as well as landscapes, geology, hydrology and especially biodiversity. The Caucasus, one of the most important eco-regions of the world, has an unusually rich flora, including many endemites, and a likewise rich animal world. This is due to its location at the cross-roads of different biogeographical regions and the complicated orographical structure of the region, the Great and the Lesser Caucasus, the unique Hirkan forests, the lowlands, and the neighbourhood of the Caspian Sea – the largest inland water body of the world, full of endemic species.

But of all the natural highlights of Azerbaijan or even of the Caucasus Eco-region, the mud volcanoes of Azerbaijan are by far the most outstanding and spectacular natural wonder.

Contrary to their name, mud volcanoes have nothing to do with true volcanism, generated by hot magma chambers in the underground. While true volcanism is always related to heat, mud volcanoes are exclusively cold.

The preconditions for the occurrence of mud volcanoes can be summarized as follows:

1. Underground reservoirs of natural gas (several thousand meters below the surface)
2. Tectonic activity
3. Groundwater.

There are areas with huge reservoirs of natural gas but completely lacking mud volcanoes, as for instance Western Siberia or the Arabic peninsula. These areas lack tectonic activity. Mud volcanoes are generated by ascending gas (during normal activity) and pressure caused by tectonic activities (eruptions). Tectonic activities on the other hand create fissures in the solid underground rockbed, which enables the gas to raise and burst onto the surface with eruptions.

Since mud volcanoes are connected to oil and gas, it is no wonder that they occur in such great quantities in Azerbaijan – a country well known for its long history and economic success related to oil and gas.

According to a recently published monograph about the world of mud volcanoes (Aliev et al. 2015), mud volcanoes have been found on all continents, including Antarctica, on many islands - but not in Australia. Out of about 2.500 mud volcanoes found worldwide, 353 have been found in Azerbaijan alone (see Fig. 2). No other country or region shows a comparable concentration of mud volcanoes.



Fig. 2: Mud volcanoes of the world.

Map: Aliev et al. 2015

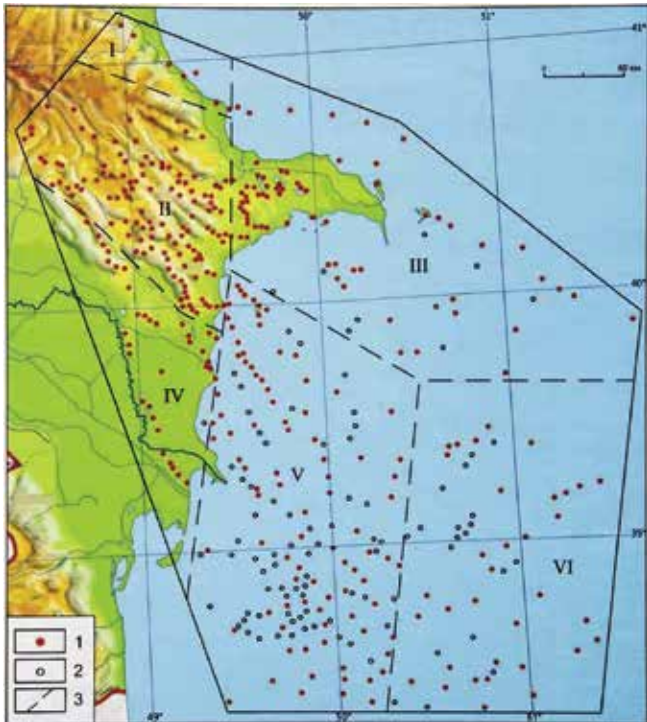


Fig. 3: Areal extent of mud volcanoes in Azerbaijan.

Map: Aliev et al. 2015

Even this high concentration of mud volcanoes concentrate in a small unique area of Azerbaijan within a diameter of about 200 km around Baku (see Fig. 3). About half of all mud volcanoes found in Azerbaijan are located in the Caspian Sea. Many of the off-shore islands are simply the summits of off-shore mud volcanoes.

Mud volcanoes: 1 – identified, 2 – assumed, 3 – boundaries of oil/gas-bearing regions and folding zones

I - Pre-Caspian – Guba

II - Shamakhy-Gobustan,

III - Absheron,

IV - Lower Kura,

V - Baku Archipelago,

VI - folding zone in the deep South Caspian.

Mud volcanoes may have very different shapes and modes of function. The smallest may have a diameter and a height of a few decimeters, the largest of the world, which are situated in Azerbaijan, have a height of about 400 m and diameters of up to 3 km. They may be dormant for decades, but most are continuously bubbling, and after decades a mud volcano may show an eruption again. During such rare eruptions, large amounts of mud may be discharged and huge fireballs burst into the sky.

The “mud” of the mud volcanoes shows a remarkable variety. In some cases, only dull water flows out, building up to a very flat volcano conus. Other’s “mud” may be less and less liquid and, in the extreme, may show a consistence of shoe cream. The resulting shape of the mud volcano becomes steeper and steeper, sometimes even steep as a chimney.

Mud volcanoes may show three different phases of activity:

1. Inactive (no mud, no gas outflow)
2. Blubbering (dull water or mud, constantly blubbering)
3. Eruption (very rare, intervals may last decades or ages – depending on tectonic activity).

Most mud volcanoes are showing blubbering, either constantly a lot of small bubbles or – with all intergrades – single huge blubs after minutes or even hours. It happens that very rare shoe cream-like mud is spit out to a distance of several meters. Very often dull water or mud is mixed with oil – in the extreme pure natural oil replaces the mud. The mud volcanoes of Azerbaijan show the complete multitude of the varieties of mud volcanoes on a global scale.

Most mud volcanoes are concentrated in Azerbaijan’s Gobustan area, a landscape of dry foothills southwest of Baku, an area sparsely inhabited by a few shepherds during the winter season. The summer season they spend in the high mountains of the nearby Great Caucasus.

It needs a four-wheel jeep to visit most of the mud volcanoes because access roads are in bad condition and many mud volcanoes are far from the next road. During wet weather there is in most cases no access at all.

Unfortunately, the mud volcanoes of Azerbaijan did not find enough attention by the tourism business and local people living in Baku or elsewhere. During the last 15 years I have had the opportunity to show different mud volcanoes to a lot of visitors both from Azerbaijan and abroad. There was not a single person who was not surprised, astonished, and who did not enjoy the visit. For me it is quite clear that the mud volcanoes have a huge tourism potential!

In principle, mud volcanoes do not create any danger. Most of the active mud volcanoes are far away from human settlements or any other human activity. In the northern suburbs of Baku (Binegedy), however, in recent years people started constructing houses very close to the foothill of a mud volcano. The last eruption of this mud volcano dates back in 1993 but during one of the next eruptions the outflow of mud may damage some of the houses closest to the volcano. If tourists come to close to a bubbling mud volcano it happens that the dry edge (closest to the mud “crater”) collapses, and a leg slips into the mud. This happened several times to me and my visitors but never resulted in any danger for anybody.

In some cases, the “mud” of mud volcanoes has been used for health treatments. But in recent times most of the mud volcanoes have been ignored by the public, and the health treatments have been abandoned.

About 50 of the most conspicuous mud volcanoes of Azerbaijan are under strict protection (Mud Volcanoes of Baku-Ab-

sheron Peninsula State Strict Nature Reserve, 12.322,84 ha). In a book published by the Azerbaijan Ministry of Ecology and Natural Resources (Nafcali 2008), a project has been mentioned to establish a mixed Culture and Nature National Park in Gobustan, including the ancient petroglyphs (UNESCO World Culture Heritage Site since 2007), part of the dry foothills of Gobustan, a representative selection of the most spectacular mud volcanoes, and the preservation of the traditional transhumant way of life of the local shepherds.

The mud volcanoes of Azerbaijan fulfill without any doubt the most important criterion to be included in the UNESCO World Heritage List – they are of „Outstanding Universal Value“. They give an outstanding example of living geology of ongoing processes of the geological evolution of the planet.

The mud volcanoes of Azerbaijan represent the world's mud volcanoes in an outstanding manner. Nowhere more mud volcanoes are concentrated on a likewise small area, and nowhere such a multitude of different varieties can be found, including the by far largest mud volcanoes.

The largest and most spectacular mud volcanoes of Azerbaijan are under strict protection. The about 50 mud volcanoes of the

“Mud Volcanoes of Baku-Absheron Peninsula State Strict Nature Reserve” may become the core area of a future World Heritage site, but a final selection may include some offshore mud volcanoes (islands) in addition.

A discussion with the Azerbaijan Minister of Ecology and Natural Resources convinced me that Azerbaijan is interested in the:

1. Protection of the mud volcanoes
2. Raising of the public awareness of the mud volcanoes
3. Inclusion of the mud volcanoes in the list of the UNESCO World Heritage.

The next meeting of the UNESCO World Heritage Committee in Baku in June/July 2019 would be an extraordinary chance to declare the intention of the Republic of Azerbaijan to include the mud volcanoes of Azerbaijan in the list of the UNSECO World Nature Heritage.

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The World of Mud Volcanoes – A Photographic Phenomenology

All photos by Hartmut E. J. Müller



Fig. 4: One of the largest mud volcanoes of Azerbaijan and the world.



Fig. 5: Result of an eruption



Fig. 6: The 2nd largest mud volcano of Azerbaijan (and the world)



Fig. 7: Typical landscape in some parts of Azerbaijan's semi desert. Goitered gazelle and mud volcano in the background.



Fig. 8: Natural outflow of oil



Fig. 9: Yanar Dag - "Burning Hill"

Tanzania: Selous Game Reserve on Endangered List for four years by 2018 ... and counting

Gunter Wippel, uranium network



Tanzania's World Heritage property Selous Game Reserve, Africa's largest protected area, has been registered as a "World Heritage in Danger" in 2014, and UNESCO has retained Selous Game Reserve on the "In Danger" – list since then (2018 Decision: 42 COM 7A.56¹) due to the imminent threat that a hydro-electric dam may be constructed in Stiegler's Gorge. However, the Selous Game Reserve has been facing another threat as well.

The Issue of Uranium mining

After repeated postponements of the Mkuju River uranium mining project in the Southwest of Selous Game Reserve, the future of the project seems more than questionable: The uranium exploration boom following the 2007 / 2008 rise of the price of uranium has dwindled away within the past years. ROSATOM, Russia's state nuclear company, had officially announced to postpone the project until 2020, and was officially granted the postponement by the Government of Tanzania.

"Some experts say that Rosatom likely overpaid for Mantra [the company which originally identified the uranium deposit and was later on bought by Rosatom] because completion of this deal occurred three months after the Fukushima nuclear disaster of March 11, 2011, when uranium market collapse could have been easily predicted. Uranium prices have since fallen three-times." ("Russian state corporation suspends \$1.2 billion uranium project in Tanzania", by Vladimir Basov).

In this situation ROSATOM would not be alone: a French state-owned company formerly named AREVA, now re-named ORANO, overpaid for a uranium deposit in Namibia (Trekkopje, by UraMin). After having acquired UraMin, the deposit had to be written down by nearly US\$ 2bn, contributing heavily to a serious loss of AREVA which got over-indebted and had to be bailed out by the French Government with an infusion of 4,5 billion €.

Nicolas Carter, vice-chief of UxC, a serious uranium consultancy company, outlined in a presentation at the URAM (Uranium Raw Materials) Conference in Vienna's IAEA premises in July 2018 that the demand for uranium will remain low for a number of years. He gave a variety of reasons – from major stocks of uranium held by companies and states, to diminished demand due to some 30 Japanese reactors offline since March 2011 (with 26 reactors still in long term outage since 2011)³.

The unresolved questions around the Mkuju River uranium project, however, remain: the intended method of mining (open pit or In-situ leaching) is undecided – also noted by the 2018 UNESCO WHC decision – nor are other issues: Among other shortcomings, the Mkuju River Environmental and Social Impact Assessment (ESIA) does not outline plans for long-term storage of tailings and has no plan how to deal with waste created by ISL.

In the meantime, complaints arise that people whose houses shall be demolished for widening roads for uranium transport in the Songea area never received the compensation they had been promised; at the same time, they are not allowed to do any maintenance work on their houses either, putting them in limbo.

With this outlook on the future of uranium mining, a closure on Mkuju River Uranium Project seems more than reasonable. The area excised in 2012 from the World Heritage site should be re-integrated into the Selous Game Reserve.

¹ <https://whc.unesco.org/en/decisions/7229/>

² <http://www.mining.com/russian-state-corporation-suspends-1-2-billion-uranium-project-tanzania/>

³ www-pub.iaea.org/iaea/meetings/56050/International-Symposium-on-Uranium-Raw-Material-for-the-Nuclear-Fuel-Cycle-Exploration-Mining-Production-Supply-and-Demand-Economics-and-Environmental-Issues-URAM-2018

Development of Large-scale Industrial Complexes in the Sundarbans

Sultana Kamal, National Committee for Saving the Sundarbans



The National Committee for Saving the Sundarbans (NCSS), a coalition of more than 50 civil society and non-governmental organizations of Bangladesh having shared interest in the environment, is concerned that the Government of Bangladesh continues to disregard the 2017 decision of the World Heritage Committee (WHC) 41COM 7B.25 to protect the outstanding universal values (OUV) of the Sundarbans Bangladesh World Heritage site.

In violation of 41 COM 7B.25.4, large scale industrial and infrastructure developments are proceeding before the Strategic Environmental Assessment has been completed.

Since the 2017 decision, Bangladesh has failed to inform the WHC of extensive plans, approvals, and construction activity for large-scale industrial development, particularly multiple coal-fired power plants directly north and east of this sensitive coastal mangrove ecosystem that is home to endangered Bengal tigers, river dolphins, and fisheries that feed millions of people. While many countries have shut down coal plants or converted them to gas to reduce carbon pollution that drives climate change, Bangladesh has disregarded the necessity of avoiding carbon pollution — as well as unavoidable toxic pollution of regional air and water — by moving forward with construction of 5,630MW of coal power plants at Rampal, Taltali, and Kalapara on the Payra River.¹

These plants will send mercury, toxic particulates, acid rain and harmful smog directly into the Sundarbans. Ship traffic, fuel spills, cooling water intake, coal ash disposal and hot water disposal could devastate harm the hilsa (ilish) fishery that makes up 12% of the fish catch of Bangladesh², and is one of the most important fish species of the Sundarbans and Bay of Bengal.³

The coal-fired power plants are a tragic mistake for World Heritage and climate, especially in light of groundbreaking new studies showing that Bangladesh could provide for its growing energy needs exclusively through clean solar facilities without affecting food production or protected areas, and at lower costs than coal.⁴

Since the 41COM, Bangladesh approved hundreds of industrial facilities in the Ecological Critical Area (ECA) of the Sundarbans

Reserve Forest despite a High Court order in August 2017 that prohibited approval of any industries within the 10 km buffer zone.⁵ These include 8 existing and 16 new LPG gas bottling plants, 6 cement plants, 3 oil refineries, 2 shipbuilding plants, a saline water refinery, a leather processing plant, a bulk storage facility, and others.⁶ In April 2018, the Government amended the Environment Conservation Act of 2010 to recategorize highly-polluting “red category” LPG bottling industries to “green category”, meaning they no longer have to comply with standard environmental conditions, including Environmental Impact Assessment (EIA).⁷

This riverfront industrial construction is reliant on ships, boats and barges to transport raw materials and finished goods. The industries will require ongoing massive river dredging that will harm Sundarbans fish, shellfish, and dolphins. All these projects have proceeded without completion of a comprehensive Strategic Environmental Assessment (SEA) for the region, as requested by WHC decision 41COM 7B.25.

To date, there has been no public announcement of a timeline or terms of reference for a Strategic Environmental Assessment (SEA) for the southwest region of Bangladesh. Without public participation, environmental assessment is inadequate. The Netherlands Commission for Environmental Assessment (NCEA) is apparently considering whether to support the SEA for the region.⁸ The Netherlands has ratified both the Espoo and Aarhus Conventions, which require public participation in environmental assessment and decision-making. We find it unacceptable that the Netherlands might finance an SEA that did not guarantee public participation. We also find it unacceptable that the World Heritage Committee and its Advisory Bodies might accept an SEA that does not include public participation.

In July 2018, John Knox, the United Nations Human Rights Council Special Rapporteur on the issue of human rights obligations related to the enjoyment of a safe, clean, healthy and sustainable environment, urged Bangladesh to halt industrialization around the Sundarbans and ensure public participation in decision-making. “To have truly sustainable development,” he warned, “it is critical to protect the environment. And to ensure that environmental concerns are taken into account, governments must listen to the voices of those who are most af-

affected by proposed industrial projects. Too often, the people who raise questions about development projects are ignored or even treated as enemies of the state. But really, they should be treated as the champions of sustainable development.”⁹

In violation of 41 COM 7B.25.8, there have been no improvements in management systems related to shipping or dredging to minimize negative impacts to the property.

Ship traffic on the Passur River continues to increase without adequate regulations or disaster management systems in place. Riverbank erosion from filling of wetlands for industrial development continues to worsen, impacting the mangrove islands of the property and local communities.

In violation of 41 COM 7B.25.9, there has been no environmental assessment 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 endangered Ganges dolphins and Irrawaddy dolphins.¹⁰ Capital dredging began in the Passur River and adjacent to the World Heritage site in early 2018, and continues today.

In violation of 41COM 7B.25.10, there is no evidence that mitigation of pollutants from the power plant at Rampal will be seriously considered as part of the SEA. Mitigation measures eventually recommended by the SEA could come too late, as the plant will already be fully constructed.

We wish to remind the Committee that the 2016 UNESCO/IUCN reactive monitoring mission to the property found that shipping and dredging for the coal plant at Rampal risks harming endangered tigers and dolphins, which are part of the outstanding universal value of the World Heritage site.¹¹ The Forest Departments of Bangladesh and West Bengal have also warned that Sundarbans tigers – and the deer they depend upon – will be further stressed by constant traffic of tankers and barges supplying the coal plant.¹²

Independent expert reviews of the plant at Rampal identified three critical mitigation measures to prevent pollution of the Sundarbans:¹³

- No coal ash should ever be disposed of in this low-lying, seismically active region.¹⁴
- State-of-the art emissions control technologies for SO₂, NO_x, PM and mercury must be used: flue gas desulfurization (FGD), selective catalytic reduction (SCR), fabric filter/baghouse (FF), and activated carbon injection (ACI).¹⁵
- Shipping of coal and coal ash on the Passur River should be avoided entirely.¹⁶

We call on the World Heritage Committee to consider the following actions at the 43 COM in July 2019:

1. Add the Sundarbans of Bangladesh to the List of World Heritage in Danger, and request an urgent reactive monitoring mission to the site to quantify, map and itemize the full scope and magnitude of massive new industrial risks;
2. Call on Bangladesh to immediately inform the Committee of industrial projects in progress around the World Heritage site, and halt construction of all large-scale industries, including the coal plants at Rampal, Taltali and Kalapara, eight LPG bottling plants, and dredging in the Passur River, until a proper SEA has been completed;
3. Call on India and China to explain their involvements in the coal plants at Rampal, Taltali and Kalapara, in light of their obligations under Article 6.3 of the World Heritage Convention not to cause harm to World Heritage sites situated in other countries, given that these projects failed to assess potentially severe risks to World Heritage; and
4. Call upon financiers not to support any large-scale industrial projects that will harm the Sundarbans World Heritage area.

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Sumatra's Last Jungles: Protecting and Enhancing the Tropical Rainforest Heritage of Sumatra

Katharine Lu, on behalf of Friends of the Earth Indonesia, Wahana Lingkungan Hidup Indonesia (WALHI) and Friends of the Earth US



"People all across the world inherit the beauty and riches of our island Sumatra. But local communities who have long dwelled in Sumatra are not considered the rightful inheritors."
Zenzi Suhadi

In 2004, the Tropical Rainforest Heritage of Sumatra (TRHS) was inscribed as a site of outstanding universal value (OUV) in terms of diverse habitat and exceptional biodiversity². Located along the impressive Bukit Barisan mountain chain, the 2.5 million hectare site consists of three separate parks on Sumatra: Gunung Leuser National Park, Kerinci Seblat National Park, and Bukit Barisan Selatan National Park (Fig. 1). Harmful activities which take place just outside the TRHS, or within unclearly marked boundaries or buffer zones, continue to pose a significant direct, indirect, or cumulative negative impact on the OUV of the site, an observation reiterated by the World Heritage Committee's Decision in 2018.

In promoting better protection for the heritage site, we strongly encourage the World Heritage Committee to recognize and emphasize the rights and indigenous knowledge of local communities with customary ties to land in or near TRHS. It is critical that the World Heritage Centre plays a strong role in calling for protecting and respecting the rights of local communities and their indigenous knowledge. Local communities have long lived in harmony with the natural jungle ecosystem, preserving and utilizing the ecosystem without damaging it. At present, the



Fig. 1: The Tropical Rainforest Heritage of Sumatra consists of three national parks: Gunung Leuser National Park, Kerinci Seblat, and Bukit Barisan National Park. The parks are all located along the Bukit Barisan Mountains, known for the giant Mount Kerinci volcano; Southeast Asia's highest lake, Lake Gunung Tujuh; dense jungle; tropical pine forests; and a range of other stunning natural phenomena.

Map: World Heritage Centre

¹ According to Indonesian law, the definition of "forest" does not apply to an entire forest ecosystem, but instead denotes specific administrative boundaries. For example, "Hutan Kawasan Industri" translates from Bahasa into (Industrial Forest Area). This means that if humans or local communities enter the forest area and do not receive prior permission from the state, it means that they are committing a crime by entering the "forest". As such, this paper uses "jungle" as our term for describing forest areas, which is based on the Bahasa word "rimba". The term rimba/jungle includes all parts of the forest, and importantly, also acknowledges the existence of indigenous peoples.

² Before 1967, the growth of human civilization and biodiversity ecosystem grew simultaneously and relatively peacefully. However, conflicts increased when the Indonesian government acquired and re-categorized the territories of indigenous into the legal classification of "forest" area, which as referenced above, is an administrative term which criminalizes human activities in "forest" areas. Law no. 5 of 1967 concerning Basic Forestry Provisions essentially legalized the state's provision of permits to corporate actors for exploitation and resource extraction in previously pristine areas. As a result, since 1967 the customary relationships between indigenous communities and their territory have been severely obstructed and limited by the state, triggering a continuing cascade of environmental and social controversies.

number of local communities are gradually decreasing due to the aggressive expansion of extractive industries, which have affected at least 33,000 villages to date. The gradual erasure of local communities and their knowledge marks not only an irrevocable loss for Indonesia's cultural history, but also for humanity's own heritage.

In addition to supporting the ongoing efforts to protect the TRHS, we wish to propose that Batang Toru, an ecosystem also located along the Bukit Barisan Mountains, be considered as an extension of the TRHS. The Batang Toru ecosystem boasts superlative natural scenery of waterfalls, mountains, and dense jungle, features which fully align with the rationale for recognizing the TRHS as an OUV site. More urgently, Batang Toru is a stronghold for iconic endangered species which also reside in TRHS, such as the Sumatran orangutan, rhino, and pangolin; it



Fig. 2: The Tapanuli orangutan is the most critically endangered ape species in the world, and is only found in the Batang Toru forest. Less than 800 are left in the wild.
Photo: Maxime Aliaga / SOCP

is also the only known habitat for the critically endangered Tapanuli orangutan, (*Pongo tapanuliensis*).³ In light of increasing threats, in addition to the discovery of the Tapanuli orangutan, the World Heritage Committee is urged to consider and acknowledge some key concerns related to protecting, enhancing, and extending the TRHS.

³ Members of the UCN Species Survival Commission (SSC) Primate Specialist Group include scientists involved in publishing the first scientific evidence for the Tapanuli orangutan; they included Ian Singleton, Matthew Nowak, and Serge Wich. <https://www.iucn.org/news/species/201711/new-orangutan-species-described-indonesia>

Promoting a Community Rights based Approach towards Protecting the Tropical Rainforest Heritage of Sumatra

In an effort to address encroachment, in 2018, Decision 42 COM 7A.40 requested that Environmental Impact Assessments (EIAs) be “rigorous”. However, requiring “rigorous” EIAs, particularly those surrounding Gunung Leuser National Park, is proving insufficient in preserving the integrity of TRHS. This is because of weak law enforcement, and the continued failure of the local and central government to actually ensure “rigorous” environmental impact assessments.

EIAs will continue to be insufficient tools in protecting TRHS unless the Indonesian government addresses the root drivers of encroachment and other threats. The expansion of corporate activities, the limited ability of the Indonesian government to effectively conserve and protect these fragile ecosystem, in addition to forcing out local communities who have long owned and used their land, is clearly producing conditions for constant conflict and erosion of TRHS boundaries and buffer zones. According to research conducted by Friends of the Earth Indonesia/WALHI⁴, harmful activities such as illegal logging, mining, etc occur as a result of the eviction and absence of local communities. This is because the Indonesian government can more easily ignore environmental and social requirements in the area once local communities are forced out and thus for-

⁴ Friends of the Earth Indonesia/WALHI is the country's oldest and largest grassroots environmental network.

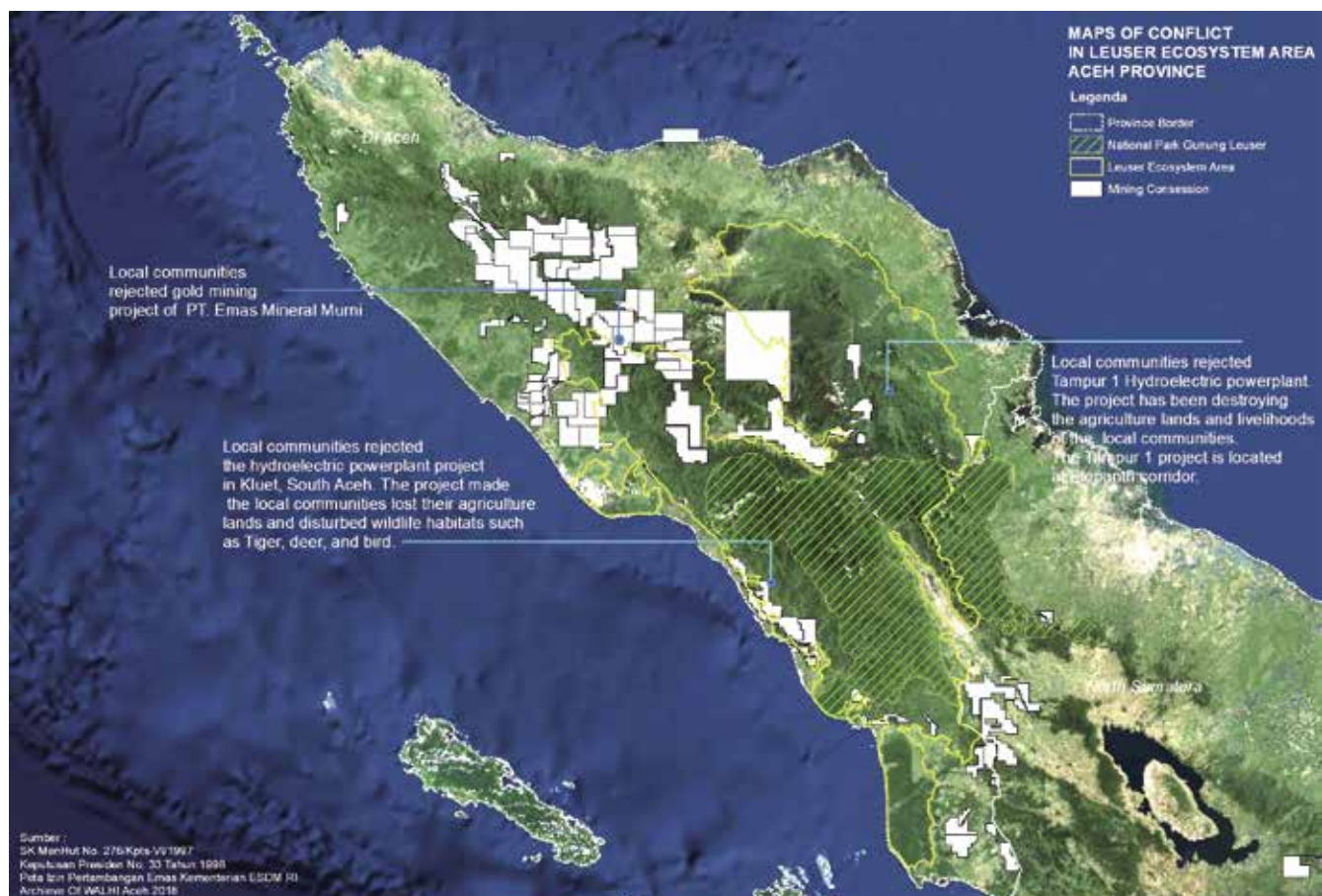


Fig. 3: Places of conflict in the Leuser Ecosystem Area.

Map: WALHI

feit their rights over their community management area⁵, which essentially creates ripe conditions for legalizing environmentally harmful activities in TRHS buffer zones, such as monoculture plantations, mining, hydrodams, and others.

Although the World Heritage Centre has encouraged the Indonesian government to revoke or stop new permits for extractive industries in THRS, the Indonesian government continues to issue permits for mining, palm oil, and pulp and paper plantations, all of which exploit and degrade the natural forest surrounding the World Heritage site. By recognizing and protecting the rights of local communities in THRS, however, local communities can serve as guardians of the heritage site, especially in fragile buffer zones, and their presence can help prevent or deter harmful impacts of extractive industries.

For instance, by drawing on their deep understanding of their local peatland ecosystem, communities in the Tohor River Village in Riau province chose sago production as a sustainable, economically beneficial alternative to harmful palm oil plantations.⁶ Their success demonstrates that the mandate for economic development is not diametrically opposed with environmental conservation, and that communities play a valuable role in using indigenous knowledge to identify sustainable alternatives that can enrich instead of impoverish local communities.

Lastly, the TRHS is rightfully recognized as a biodiversity hotspot for critical and rare species. Conservation efforts should of course continue, but we urge the World Heritage Committee and Indonesian government to approach conservation with the goal of protecting and enriching the quality of life for both charismatic species and local communities. Therefore, “fortress model” towards conservation should be abandoned, particularly in areas where animal and forest communities have long dwelled. Calls to replace the “fortress model” of conservation with a rights-based approach have been growing. For instance, according to the United Nations Special Rapporteur on Indigenous Peoples, Victoria Tauli-Corpuz: “...human pressure is increasing in and around protected areas, and far from improving the lives of those affected by the growing number of conservation initiatives, land and forest sequestration through ‘fortress’ conservation approaches is creating chronic patterns of abuse and human-rights violations”⁷.

5 Wilayah Kelola Rakyat (WKR) translates to Community Management Area, which is an integrative and participatory management system related to the governance, production, distribution, and consumption of local resources. This management system recognizes natural environmental functions as the basis and source of local values and knowledge, which thus promotes and enables prosperity, justice and sustainability for all. <https://walhisumsel.or.id/wilayah-kelola-rakyat/>

6 Jeff Conant, “Indonesia’s New President Promises to Put Peat Before Palm Oil”, IPS News, December 5, 2014. <http://www.ipsnews.net/2014/12/indonesias-new-president-puts-rainforests-before-palm-oil-plantations/>

7 Victoria Tauli-Corpuz, Janis Alcorn, Augusta Molnar, “Cornered by Protected Areas”, Rights and Resources Initiative, June 2018. https://rightsandresources.org/wp-content/uploads/2018/06/Cornered-by-PAs-Brief_RRI_June-2018.pdf

Viewing the conservation of the TRHS as part of a broader effort to incorporate the value of local communities as “local guardians” of the forest should be considered critical in ensuring long-term sustainability and success for the mutual well-being of the forest, endangered species, and communities. We ask the World Heritage Committee to consider acknowledging and encouraging this rights-based approach in strengthening conservation efforts as a recommendation to the Indonesian government.

A proposal to Enhance and Extend the Tropical Rainforest Heritage of Sumatra

Currently, Batang Toru does not enjoy the highest level of environmental protection under Indonesian law. As a result, the Tapanuli orangutan population is at a tipping point due to threats from the Batang Toru Dam and gold mining⁸. In particular, road clearance and tunnel blasting for the Batang Toru Dam has already begun, and if the project proceeds, the species’ small habitat will ultimately be fragmented into three separate forest blocks. If this occurs, the long term survival of the species will be jeopardized. The loss of forest canopy will essentially trap the Tapanuli orangutans since they are strictly arboreal, meaning they never touch the ground.



Fig. 4: Map source: Batang Toru for World Heritage (2018)

Consisting of three West, East, and South (Sibual-Buali) primary forest blocks, the Batang Toru ecosystem spans across 1,420 square kilometers in the South Tapanuli highlands of North Su-

8 The Batang Toru Dam is being developed by PT North Sumatra Hydro Energy (PT NSHE), and is being financed by Bank of China. Due to the urgent threats facing the Tapanuli orangutan, WALHI has communicated environmental and social concerns to Bank of China. Although Bank of China is aware of the situation, it has failed to publicly demonstrate it will intervene in response to WALHI’s and the scientific community’s concerns regarding the survival of the Tapanuli orangutan. The project has also triggered a number of protests at the Chinese Embassy in Jakarta and internationally due to local opposition to the Batang Toru Dam.

matra. Incorporating Batang Toru into TRHS would expand the 2.6 million ha TRHS by about 5%. The TRHS was incorporated as a World Heritage site based on the following criteria: criteria vii, criteria ix, and criteria x. Like the TRHS, the Batang Toru ecosystem would qualify for outstanding universal value under all three criteria.

- **Criterion vii: Superlative Natural Beauty**

The three parks within the TRHS all lie on the Bukit Barisan mountains, which are known as the “Andes of Sumatra”⁹. This mountain range is known for its string of volcanoes, dense jungle, and cave systems. Batang Toru is also located on the Bukit Barisan mountain chain and contains the similarly spectacular rugged landscape of mountains, gorges, rainforests, caves, and waterfalls¹⁰.



Fig. 5: Jungle landscape of the Bukit Barisan mountains. Photo: Nanang Sujana

- **Criterion ix: Representing Critical Biodiversity and Ecological Processes**

Like the TRHS, Batang Toru contains primary forest and refuge for numerous critical and rare species. The Batang Toru ecosystem exhibits unique evolutionary processes – the area “maintains an unbroken transition between lowland rainforest and highland moss forest”¹¹. Furthermore, Batang Toru is the world’s only refuge for the Tapanuli orangutan, of which less than 800 remain¹².

- **Criterion x: Important Habitats for In-Situ Conservation**

In addition to the Tapanuli orangutan, a range of rare and endangered species are found in Batang Toru. For instance, Sumatran tigers, sun bears, gibbons, and pangolins are all found in



Fig. 6: Sumatra tiger. Photo: SOCP



Fig. 7: An orchid from Batang Toru. Photo: SOCP

the area. There are at least 311 bird species, 28 bat species, 80 reptile species, and 64 species of frogs and toads. Batang Toru also boasts over 1000 tree species and hundreds of orchid species, some of which were just discovered¹³.

As reflected in the 2018 IUCN Monitoring Mission Update, the Indonesian government has already been asked to review and clarify the official boundaries of the TRHS, in addition to its buffer zones. Adding Batang Toru to the TRHS as a minor border modification would be consistent with the World Heritage Committee’s 2018 recommendation that “changes to existing boundaries and buffer zones should have the primary objective of strengthening the protection of OUV”¹⁴. Adding Batang Toru would clearly enhance and strengthen the TRHS’ value as

9 “Tropical Rainforest Heritage of Sumatra”, World Heritage Centre. <https://whc.unesco.org/en/list/1167>

10 “The BATANG TORU ECOSYSTEM for World Heritage”, Youth Climate Change Sumatra Utara, Forum Konservasi Orangutan Sumatera, Sumatran Orangutan Society, YEL, PanEco, Orangutan Information Centre, November 2018.

11 Ibid.

12 Ibid.

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14 “Decision: 42 COM 7A.40: Tropical Rainforest Heritage of Sumatra (Indonesia) (N1167). <https://whc.unesco.org/en/decisions/7213>

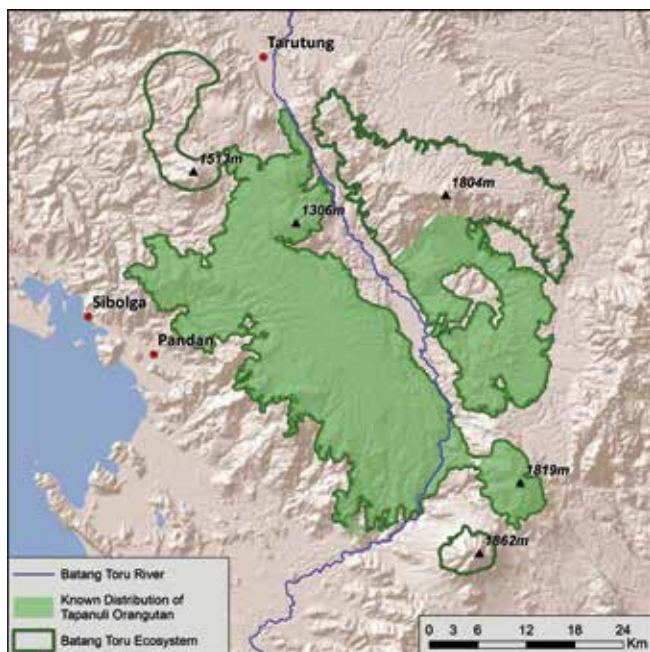


Fig. 8: Area of the suggested Batang Toru extension of the Tropical Rainforests of Sumatra WHS.

Map source: Batang Toru for World Heritage (2018)

a World Heritage site given its superlative natural scenery and rich biodiversity. Batang Toru is located between Gunung Leuser National Park and Kerinci Seblat National Park, and could potentially serve as a critical refuge for not only the Tapanuli orangutan, but also other charismatic megafauna.

Recommendations on Protecting the Tropical Heritage Rainforest of Sumatra

- Require the Indonesian government to report on progress in clarifying the buffer zones and boundaries of the TRHS.
- Call on the Indonesian government to apply equally strong conservation protections to TRHS buffer zones and TRHS core conservation areas.
- Urge the Indonesian government to cancel or suspend any energy, plantation, logging, and mining concessions nearby and within buffer zones of the TRHS.

- Acknowledge the benefits of a rights-based approach towards conservation, especially in the context of ongoing conservation efforts for the TRHS.
- Retain the TRHS as “in danger” until further progress has been made in clearly delineating and protecting TRHS borders and buffer zones.
- Conceptualize and establish protections for TRHS as a singular ecological system, which includes TRHS and local communities.
- Conduct an inventory of local communities with customary rights to land in or near TRHS, and initiate efforts to preserve indigenous knowledge and local wisdom

Recommendations on Enhancing and Extending the Tropical Heritage Rainforest of Sumatra to Include Batang Toru

- Recognize the Outstanding Universal Value of the Batang Toru ecosystem.
- Urge the Indonesian government to include Batang Toru in the TRHS.
- Express urgent concern regarding the Indonesian government’s failure to fully protect the Tapanuli orangutan, especially given Indonesian and international efforts to conserve orangutans in TRHS and writ large.
- Call on financial and corporate actors to qualify the TRHS, Batang Toru, and their respective buffer zones as a “no go” area.
- Call on the Indonesian government to protect the TRHS and Batang Toru from harmful mining and infrastructure activities by suspending or cancelling any mining or infrastructure concessions in buffer areas immediately.

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Losing the Great Barrier Reef: Australia's Failures to Reduce Its Contributions to Climate Change

Noni Austin, Earthjustice | Jo-Anne Bragg, Environmental Defenders Office
 Louise Matthiesson, Queensland Conservation Council |
 Brendan Sydes, Environmental Justice Australia |
 Imogen Zethoven, Australian Marine Conservation Society



Humanity is at grave risk of losing a crown gem of world heritage: the Great Barrier Reef. During 2016 and 2017 alone, almost 50% of the coral in the Reef died due to bleaching caused by elevated ocean temperatures attributed to climate change.¹ Under good conditions, recovery from bleaching normally takes 10 to 15 years,² but the cumulative effects of chronic pressures such as poor water quality, warming water, and cyclones have impaired the Reef's ability to recover.³ Frequently repeated bleaching events like those of the past few years can thus be fatal to reefs, and these bleaching events have substantially diminished the Reef's outstanding universal value.⁴



Fig. 1: Coral bleaching at Heron Island, Great Barrier Reef.

Photo: The Ocean Agency /XL Catlin Seaview Survey

Scientists from the World Heritage Centre and Coral Reef Watch predict that, without a substantial reduction in greenhouse gas emissions, the Great Barrier Reef will experience severe bleaching twice per decade by 2035 – a frequency that will rapidly kill most corals – and annual bleaching by 2044.⁵

In 2017 and 2018, the World Heritage Committee expressed its utmost concern about the impacts of climate change on World Heritage-listed coral reefs.⁶ The Committee also reiterated the importance of States Parties undertaking the most ambitious implementation of the Paris Agreement of the United Nations Framework Convention on Climate Change (UNFCCC) by “holding the increase in the global average temperature to well below 2°C above pre-industrial levels and by pursuing efforts to limit the global average temperature increase to 1.5°C above

pre-industrial levels recognizing that this would significantly reduce the risks and impacts of climate change”. The Committee strongly invited all States Parties to undertake actions to address Climate Change under the Paris Agreement consistent with their common but differentiated responsibilities and respective capabilities, in the light of different national circumstances, that are fully consistent with their obligations within the World Heritage Convention to protect the outstanding universal value of all World Heritage properties.⁷



Fig. 2: A healthy Great Barrier Reef.

Photo: <https://blog.atairbnb.com>

Analysis by the World Heritage Centre and Coral Reef Watch confirms the urgent need to drastically reduce greenhouse gas emissions and limit warming to 1.5°C above pre-industrial levels to protect World Heritage-listed coral reefs from bleaching and mortality due to heat stress.⁸ Limiting warming to 1.5°C would prevent severe annual coral bleaching this century, as well as twice-per-decade severe bleaching on 86 % of World Heritage-listed coral reefs.⁹

These conclusions are consistent with the recent findings of the Intergovernmental Panel on Climate Change (IPCC) on the impacts of global warming of 1.5°C:

„Limiting global warming to 1.5°C compared to 2°C is projected to reduce increases in ocean temperature as well as associated increases in ocean acidity and decreases in

ocean oxygen levels (*high confidence*). Consequently, limiting global warming to 1.5°C is projected to reduce risks to marine biodiversity, fisheries, and ecosystems, and their functions and services to humans, as illustrated by recent changes to...and warm-water coral reef ecosystems. ... Coral reefs...are projected to decline by a further 70-90% at 1.5°C (*high confidence*) with larger losses (> 99%) at 2°C (*very high confidence*)."¹⁰

Under current climate change projections, even full implementation of nationally determined contributions (NDCs) under the Paris Agreement would fall short of the global emissions reductions necessary to limit warming to even 2°C.¹¹ Meeting those commitments would put the world on track for over 3°C of warming by 2100.¹²

To limit warming to 1.5°C, the IPCC report makes clear that the world must phase out coal-generated electricity by 2050.¹³ The United Nations Environment Programme has also emphasized that coal-based power generation "is the single most important cause of carbon lock-in," and that "[p]hasing out coal consumption in the power sector... is an indispensable condition for achieving international climate change targets."¹⁴

Australia is failing to do its fair share to protect the Great Barrier Reef

The Committee's 2017 and 2018 decisions make clear that Australia, like all state parties to the World Heritage Convention, must do its fair share to reduce its contributions to climate change, including by pursuing efforts to limit global warming to 1.5°C above pre-industrial levels.

Although Australia's *Reef 2050 Long-Term Sustainability Plan* – the framework for managing the Reef until 2050 – acknowledges the threat of climate change to the Reef,¹⁵ it fails to include any substantive steps beyond reliance on inadequate government climate policy, and is silent on the impact of greenhouse gas emissions from Australia's fossil fuel developments. To the contrary, the government has shown contempt for international scientific consensus and action on climate change¹⁶ and is hastening the Reef's death by failing to do all it can to reduce its contributions to climate change.

Increasing greenhouse gas emissions and unrealistic Paris commitments

Australia is among the world's highest per capita emitters of greenhouse gases,¹⁷ and it is highly unlikely the country will meet its NDC to reduce emissions by 26–28% below 2005 levels by 2030.¹⁸

In 2017, Australia's emissions increased for the third consecutive year.¹⁹ Emissions are expected to continue growing until 2030 despite the fact that Australia's NDC requires it to reduce emissions by between 868-934 Mt CO₂ per year between 2021 and 2030.²⁰ Australia has no policies that would enable it to meet its NDC.²¹ In September 2018, the government abandoned the

National Energy Guarantee, which would have made minor reductions to business-as-usual emissions.²² Experts consider Australia's Emissions Reduction Fund inadequate to meet the NDC.²³ And the government has stated it will not replace the Renewable Energy Target when it expires in 2020.²⁴ On top of this, the government has expressed its support for extending the life of the country's existing coal-fired power plants.²⁵

Even if Australia were to meet its NDC, scientists and other experts – including an independent advisory body to the government – have criticized the NDC as failing to represent Australia's fair share of limiting temperature rise to 2°C, let alone 1.5°C.²⁶ Indeed, if most other countries followed Australia's NDC, this would lead to warming of up to 3°C, and if they followed Australia's current policies, warming would exceed 3–4°C.²⁷

Expanding production of fossil fuels that would contribute to climate change and loss of the Great Barrier Reef

In addition to its direct emissions, Australia is one of the world's largest producers of coal, the burning of which fuels climate change. Despite strong opposition from scientists,²⁸ the country is doggedly supporting the development of some of the largest new coal mines in the world in undeveloped coal basins, as well as the expansion of existing mines. For example, in the state of Queensland, the government is committed to opening the undeveloped Galilee Basin – one of the world's largest untapped coal reserves – to at least six (and possibly more) massive coal mines.²⁹ One of these mines, the Carmichael Coal Mine and Rail Project, would be among the world's largest coal mines. At full operational capacity, the average annual emissions attributable to this mine would be more than the total amount of carbon reduction Australia has promised to achieve under the Paris Agreement.³⁰ In the state of New South Wales, there are now 1.881 billion tons of coal extraction recently approved or in the planning pipeline.³¹ Burning this coal would emit the equivalent of 5.4 billion tonnes of carbon dioxide – 10 times Australia's current annual emissions.³² These new and expanded mines will lock in decades of emissions that would be a real and significant threat to the Great Barrier Reef.³³

Request for action

In light of Australia's policy failures and the ongoing deterioration of the Great Barrier Reef World Heritage Area, we request that at its 43rd session in 2019, the World Heritage Committee:

1. Require that Australia include in its State of Conservation Report due on 1 December 2019 a detailed account of how it will undertake the most ambitious implementation of the Paris Agreement, for consideration at the subsequent session of the World Heritage Committee in 2020;
2. Call on Australia not to approve or support any new development projects that will directly, indirectly, or cumulatively harm the Great Barrier Reef World Heritage Area, including by contributing to climate change. Specifically, because of

the Carmichael Coal Mine's outsized contribution to climate change, and in light of the extensive bleaching of the Reef in 2016 and 2017 due to elevated ocean temperatures and ongoing vulnerability of the Reef to the impacts of climate change, call on Australia to revoke its environmental approval of the Carmichael mine.

3. Require Australia to report annually on its progress in implementing the Reef 2050 Plan and its response to the ongoing coral bleaching crisis, including on the substantive near-term steps it is taking to immediately address the threat of climate change to the Great Barrier Reef World Heritage Area;
4. Call on Australia to increase its nationally determined contribution under the Paris Agreement to reflect its fair share to reduce its greenhouse gas emissions, and to implement measures to ensure that it will achieve that NDC;
5. Call on financiers not to support or fund development projects that will directly, indirectly, or cumulatively harm the Great Barrier Reef World Heritage Area.

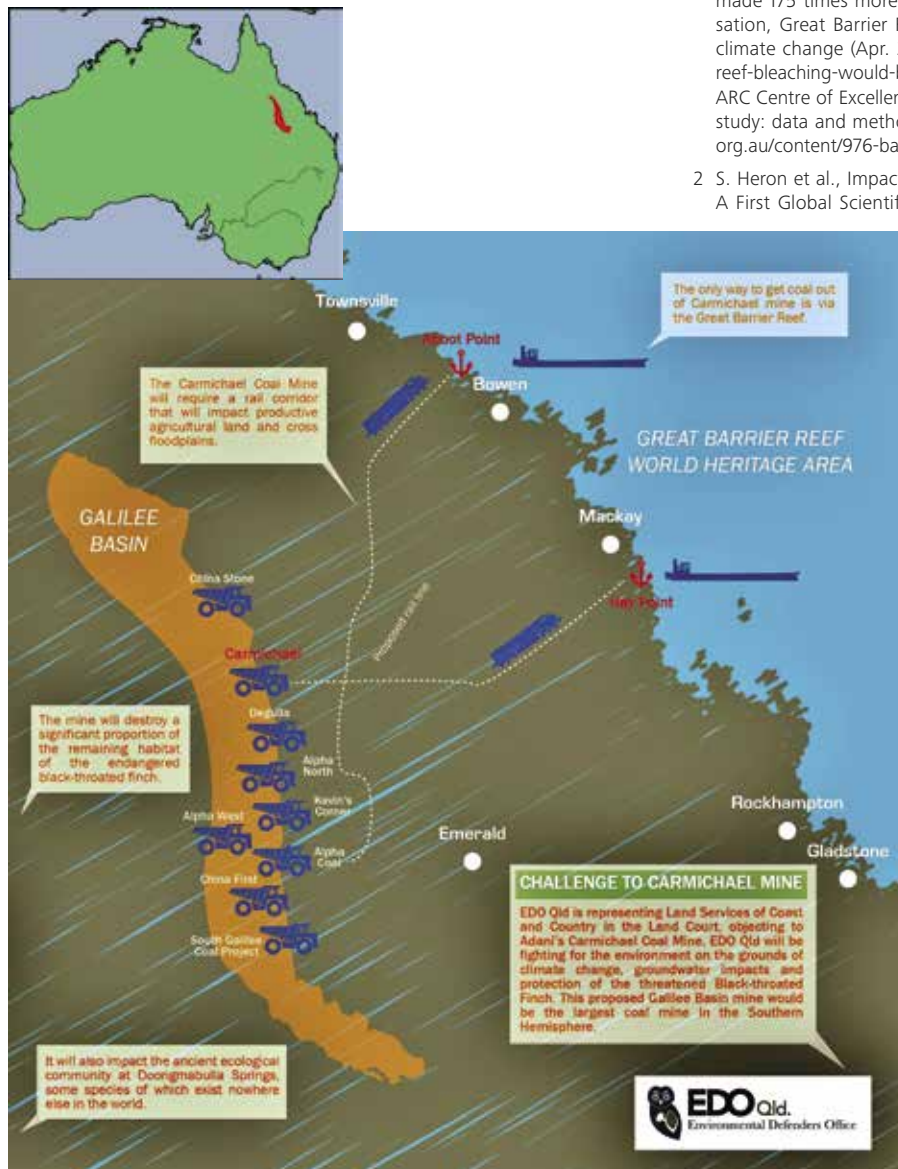


Fig. 3: The Galilee Basin, its planned nine mines and the coal transport routes to the coast by the Great Barrier Reef.

Maps: Environmental Defenders Office Queensland, www.earthbyte.org

If Australia fails to commit in writing to fulfil the preceding requirements and show within one year that it has fulfilled them, the World Heritage Committee should inscribe the Great Barrier Reef World Heritage Area on the List of World Heritage in Danger at its 44th session in 2020.

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Government Push for Tourism Development Undermines a Proud Record

Geoff Law, Wilderness Society (Australia)



For most of the life of the World Heritage Convention, Australia has played an exemplary role in fulfilling the Convention's objectives. In the 1970s and 1980s, Australia nominated eight major sites, including places such as the Great Barrier Reef and Kakadu. In 1983, Australia passed what was arguably the world's first legislation aimed exclusively at protecting World Heritage properties and stopped a series of dams that would have inundated the heart of the Tasmanian Wilderness. It has also frequently played a leadership role on the World Heritage Committee, standing up for due process and defending the work of the advisory bodies.

In recent years, however, Australia's record has been less praiseworthy. The Great Barrier Reef continues to suffer from climate change, off-shore pollution due to poor land management, and the development of coal-export shipping-lanes (EJ & EJA 2017). Attempts by Australia to log parts of the Tasmanian Wilderness in 2014 and 2015 were rebuffed by the Committee (UNESCO 2014, 2015). And in 2018, in order to push a pro-development agenda within a World Heritage property, Australia showed that it is prepared to debase its own environment laws.

The Environment Protection Biodiversity Conservation (EPBC) Act forms the basis of Australia's commitment to manage and protect World Heritage properties (Australia 2018; Tasmania 2016). It identifies World Heritage as a trigger for active involvement by the Australian Government in the treatment of sites that would otherwise be managed exclusively by states such

as Queensland and Tasmania. However, recent events concerning a proposed development at Lake Malbena, a remote glacial lake within the Tasmanian Wilderness World Heritage Area, have shown how inadequate the EPBC is when administered by a government that favours development over protection of Outstanding Universal Value (OUV).

The Tasmanian Wilderness is a large, mixed World Heritage property of great diversity. Its habitats range from lowland rainforests to alpine meadows, and from coastal inlets to glacial lakes. Cultural attributes include rock art, sprawling shell-middens, and deposits of stone tools that have accumulated in caves for over 30,000 years. It's a place where people can experience great seclusion from the clamour of modern society.



Fig. 2: Halls Island in Lake Malbena: the government granted a private developer an exclusive lease over this public land, part of the World Heritage property.

Photo: Grant Dixon



Fig. 1: A panoramic photo demonstrates the wild, remote nature of the Lake Malbena area within the Tasmanian Wilderness World Heritage property. Photo: Grant Dixon

The attribute of wilderness has been recognised as part of the Outstanding Universal Value (OUV) of the Tasmanian Wilderness since its inscription. The property was prominently described in the 1981 nomination as 'one of the last remaining temperate wilderness areas in the world' (Australia 1981). The 1989 proposal for extension continued this emphasis, saying 'it is this wilderness quality which underpins the success of the area in meeting all four criteria as a natural property and which is the foundation for the maintenance of the integrity of both the natural and cultural values which are displayed' (Australia 1989). Evaluations by IUCN affirmed the importance of wilderness (IUCN 1982, 1989). The World Heritage Committee has, of course, implicitly recognised the importance of wilderness to

the character of the property by approving the property's name – 'the Tasmanian Wilderness'.

More recently, the Committee has expressed concern about how wilderness is to be maintained within the property. In 2015, it called for 'recognition of wilderness character of the property as one of its key values and as being fundamental for its management' and asked Australia to establish 'strict criteria

for new tourism development within the property which would be in line with the primary goal of protecting the property's OUV, including its wilderness character and cultural attributes' (UNESCO 2015).

The Tasmanian Government, unfortunately, has had other priorities. In 2014, it invited the private sector to submit proposals for tourism infrastructure within Tasmania's reserved lands

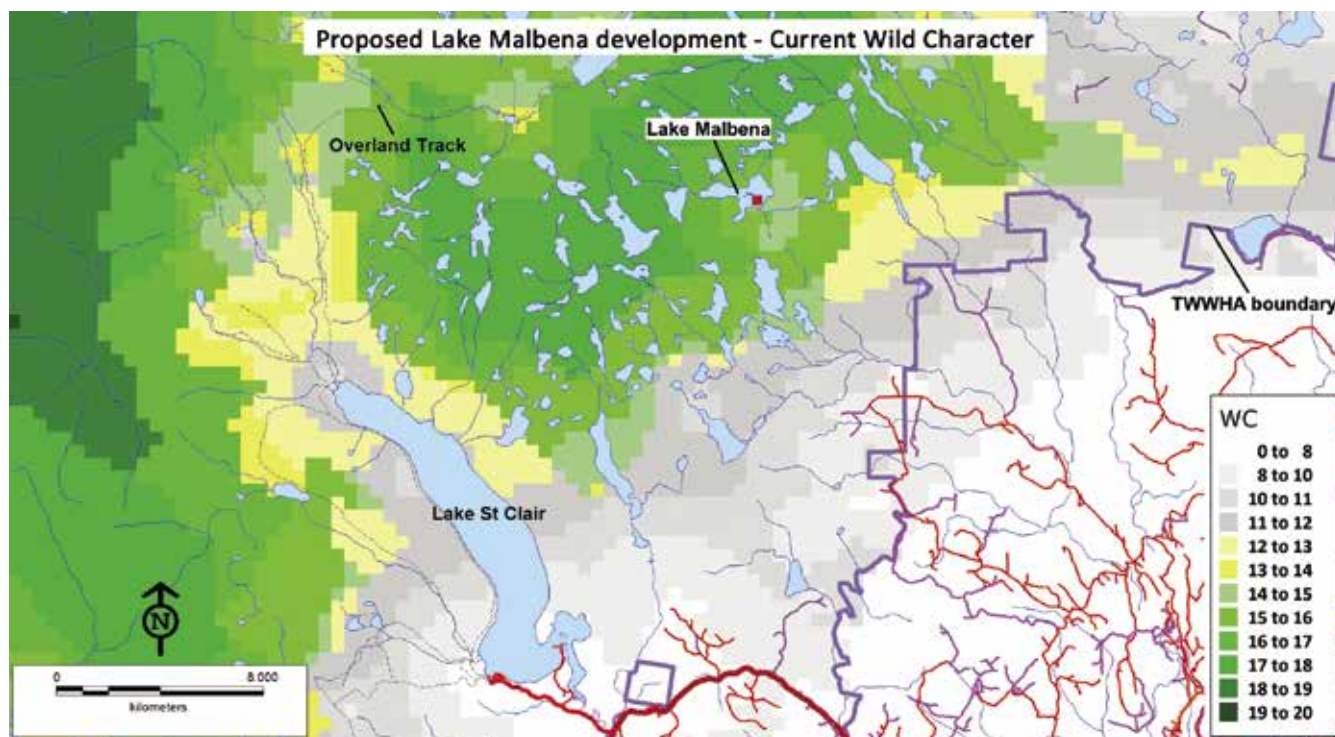


Fig. 3: Current wilderness character in the Lake Malbena area.

Map: Martin Hawes Walking Track Design and Management

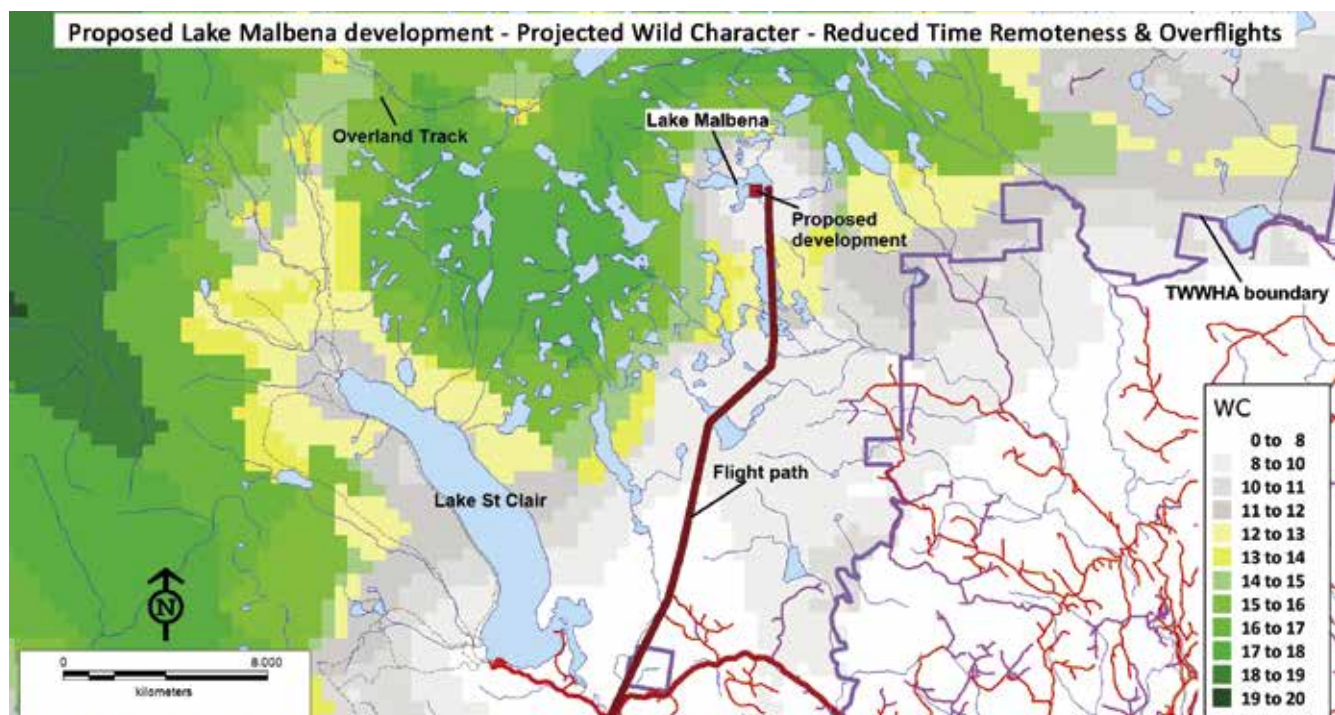


Fig. 4: Wilderness character in the Lake Malbena area if the proposed helicopter-served accommodation complex is established.

Map: Martin Hawes Walking Track Design and Management

(Tasmania 2014). What followed was an avalanche of proposals for lodges, walking tracks, helicopter pads, bike trails, boats, roads and cable cars. One such proposal involved a 'luxury standing camp' at Lake Malbena, a glacial lake over eight km from the nearest road and 25 km from the nearest town (Tasmania 2018). The lake and its environs have long been cherished by trout fishers and hikers as a tranquil and pristine hideaway.

Gradually, details emerged about the proposal. The 'standing camp' would involve permanent buildings of wood and metal. Hundreds of helicopter flights over the World Heritage Area would be required. A walking track connecting the helicopter pad to the lakeshore would be constructed. Tours to nearby Aboriginal cultural heritage were envisaged.

The proposal had been enabled by an irregular change to the Management Plan for the Tasmanian Wilderness. In 2016, the zoning of Lake Malbena was changed from 'Wilderness' to 'Self Reliant Recreation' without any opportunity for public comment on this change. IUCN expressed concern at the re-zoning (UNESCO 2018b, p.117). This underhand move by both governments prompted fears of additional intrusion occurring through stealthy incremental changes to the development. Such potential includes motorised water craft on Lake Malbena, proliferating buildings, additional helicopter visits, new tracks, and motorised visits to lakes further afield.

The Wilderness Society sought to ascertain the impacts of the proposal on the key attribute of wilderness by engaging the Government's preferred consultant to assess the project using GIS techniques. The resulting report warned that the proposed development would cause 'significant loss of wilderness character at the lake and in the surrounding country'. The area to be adversely affected covered some 4900 ha (see Figs. 3 and 4). This report confirmed people's intuitive concerns by way of an authoritative, quantitative evaluation (Hawes 2018).

Meanwhile, the Tasmanian and Australian governments had formally considered the Malbena proposal. The Tasmanian Government controversially carried out an in-house assessment devoid of public input or external expert advice and, in March 2018, approved the development subject to further approval by the Australian Government. At first, the Australian Government appeared as if it would carry out this assessment conscientiously. Public submissions were invited; further details were sought from the proponent. But then, in August 2018, the Government announced its determination that no significant impacts on OUV were anticipated, and thus detailed assessment and formal approval under the EPBC would not be required (DoEE 2018).

Conservationists, angling groups and experts were shocked. Their anger deepened as information formally put to the Australian Government gradually leaked into the public domain:

- Over nine hundred formal public submissions had been received by the government, not one of which supported the proposed helicopter-serviced 'luxury camp' (Barker 2018).
- An expert panel tasked with advising both governments about management of the Tasmanian Wilderness had warned of precedents that would degrade World Heritage values and recommended against consideration of such projects until the establishment of 'an agreed framework to guide assessment'. A particularly scathing paragraph referred to 'the erection of permanent structures masquerading as standing camps' (NPWAC 2018).
- The Tasmanian Aboriginal Heritage Council had advised the Minister not to approve the project because of the lack of adequate assessment of Aboriginal cultural heritage in the vicinity of the lake and the absence of an agreed framework to progress management of that heritage (Tasmanian Aboriginal Heritage Council 2018).
- The Australian Heritage Council, a statutory body tasked with advising the Australian Government, had warned that the cumulative impact of the development on World Heritage values would be 'considerable, particularly noting the impact of helicopters on the outstanding aesthetic value of the wilderness area in which it is situated' (AHC 2018).

To make matters worse, in October 2018 it was revealed that the Tasmanian Government had secretly granted the proponent an exclusive lease over a 10-hectare island in Lake Malbena, effectively privatising part of the World Heritage Area (Denholm 2018). Similar privileges have been doled out to developers seeking to commercialise other parts of the Tasmanian Wilderness, with government funding pledged for tracks, a cable car, mountain-bike trails, helipads and several accommodation installations (Bayley 2017; Law & Bayley 2018). All of this has preempted a Tourism Master Plan recommended by a 2015 Reactive Monitoring Mission and the World Heritage Committee (Jaeger & Sand 2016; UNESCO 2018a). Clearly, the governments' advisory panel, NPWAC, was not wrong when it warned that the Malbena development could set precedents that would 'degrade World Heritage values'.

It's not hard to spot the bad precedents. Governments abused due process by changing the Management Plan for the World Heritage Area after the public-comment period in order to accommodate the development. The Tasmanian Government carried out a flawed assessment by deliberately excluding public input and expert opinion. No evaluation of the proposal's impact on wilderness was carried out. The State Party ignored advice from its own experts on natural heritage, national parks and Aboriginal cultural heritage. The State Party ignored the overwhelming weight of public submissions. The decision by the State Party to approve the Malbena development debased the much-vaunted EPBC Act. The State Party pre-empted the Tourism Master Plan promised to the World Heritage Committee. The State party ignored its own commitment to honour Committee requests to protect wilderness.

Given Australia's history and role in the World Heritage processes, its current performance should ring alarm bells in the international community.

To forestall the negative consequences of both the Malbena development and the precedents it would set, the Wilderness Society has challenged the State Party's decision in court. The aim is to compel the State Party to honour its obligations under the World Heritage Convention. However, due to limitations in Australia's environmental laws, the court case will hinge not on the impacts of the actual project but rather on the process by which the government reached its decision. Success is not guaranteed.

In November 2018, a well-known fishing guide and author chastised the state government for supporting the Malbena development. After calmly listing the arguments against the proposal, he concluded: 'And if all else fails? Well, there's always direct action. If it comes to that, I for one will be there on the shores of Malbena standing up for both wilderness and democracy.' (French 2018)



Fig. 5: On 27 November 2018, hundreds of people gathered in protest in the Hobart Town Hall. Speakers from the Aboriginal community, anglers groups, academia and state parliament spoke in favour of maintaining the wilderness quality of the World Heritage Area.

Photo: Wilderness Society (Australia)

Once again, as occurred throughout the 1980s and 1990s, it seems that the State Party's failure to protect the Tasmanian Wilderness may result in on-site protests. In the meantime, Australia's flouting of due process, ignoring of experts, sneaky fiddling with management plans, sidelining of wilderness, and debasement of its own environment laws are worthy of close attention by IUCN, ICOMOS and the World Heritage Committee.

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II. World Heritage Properties and Indigenous Peoples

Mikisew Cree First Nation's Call to Better Safeguard Wood Buffalo National Park

Submitted by: The Mikisew Cree First Nation



"The world needs to know what's happening here, and the effect from the oil industry and the Bennett Dam and climate change. The people here are suffering and they cannot practice their God-given right to hunt, to trap, to fish, to be Mikisew. It's a sad reality."

Mikisew Cree elder

We, the Mikisew Cree First Nation, are an indigenous group whose homeland includes the World Heritage Site, Wood Buffalo National Park and Peace-Athabasca Delta in northern Canada.

The Peace-Athabasca Delta is the largest inland freshwater delta in North America and arguably the largest boreal wetland in the world. It supports wood bison, migratory waterfowl and songbirds, and a range of unique and important natural processes, all of which were part of justifying the inscription of Wood Buffalo National Park as a World Heritage

site. Critically, the Peace-Athabasca Delta also supports the ways of life of indigenous peoples such as us. For Mikisew people, the Peace-Athabasca Delta, called Ayapaskaw in Cree, is everything.

As traditional stewards of these lands and waters, we have witnessed parts of the Peace-Athabasca Delta in Wood Buffalo National Park deteriorate as a result of industrial activities and climate change. Because our culture is tied to the Peace-Athabasca Delta, the loss of Wood Buffalo National Park's natural values puts our distinctive culture at risk. The Peace-Athabasca Delta has already deteriorated to a point that our elders feel a sense of tremendous loss and sadness for current and future generations.

Industrial activities along the two main rivers that create the Delta are changing the water quantity and quality within the Park. On the Peace River, a new, major dam is under

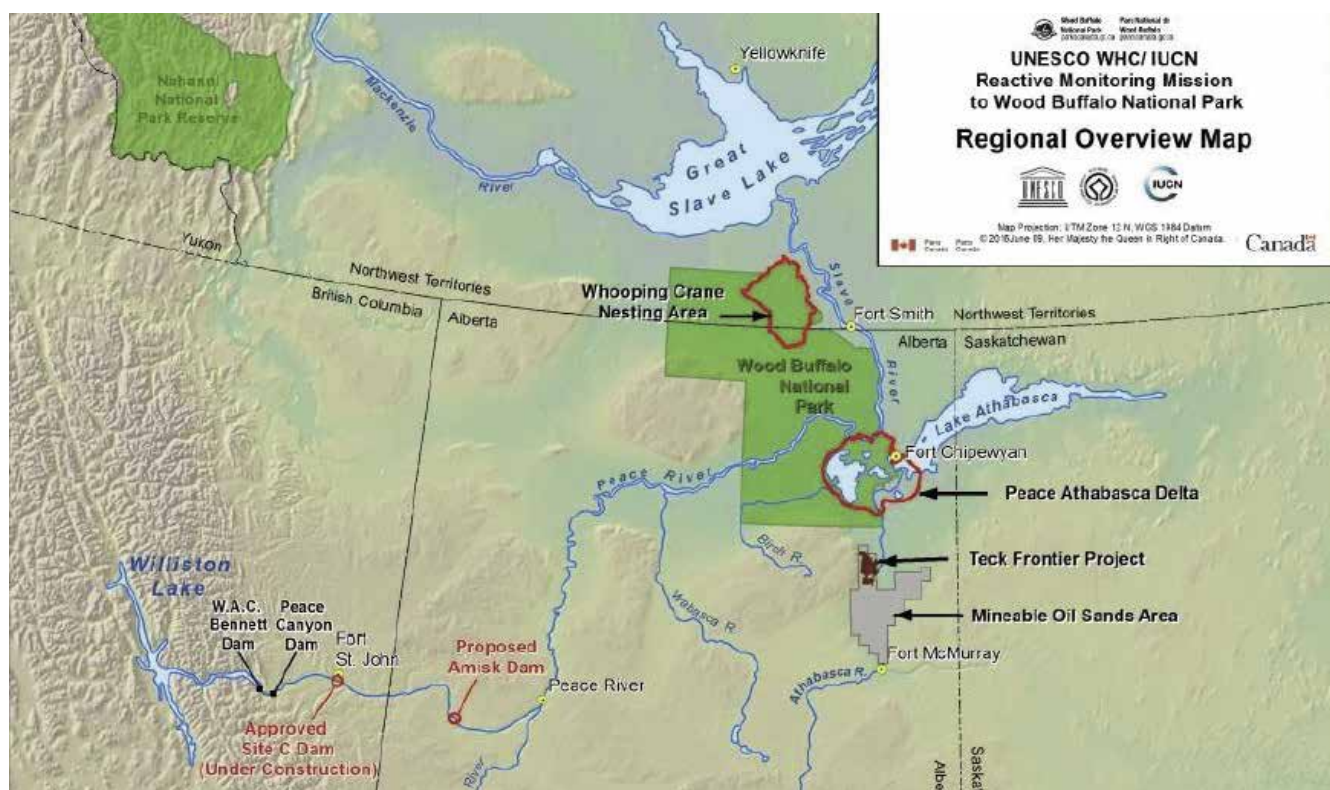


Fig. 1: Map of threats to Wood Buffalo National Park.

Source: UNESCO WHC/IUCN Reactive Monitoring Mission Report

construction, despite significant concern with deficiencies in its permitting process. Upstream on the Athabasca River is the oil sands region of Alberta, where an ever-increasing number of oil sands mines and large tailings ponds are located adjacent to that river. The largest oil sands mine ever to be proposed, and the first to be partially within a watershed that flows directly into the Peace-Athabasca Delta, has now gone through a hearing, where its impacts to Wood Buffalo National Park were considered, but no decision has yet been rendered.

Even though some of the largest industrial projects in North America are upstream of this World Heritage site and are known to have downstream effects, necessary legal safeguards and management measures for the Park's OUV are lacking. Weak regulatory protections, deficient information, problematic land use planning outside the Park and a lack of meaningful consultation with Indigenous peoples undermine protection of the Peace-Athabasca Delta.

Because of the ongoing failure of governments to respond to our requests for credible actions to manage the threats to the Peace-Athabasca Delta, in 2014 we turned to the World Heritage Committee, filing a petition to have Wood Buffalo National Park inscribed on the List of World Heritage in Danger. Our petition gained support from former Parks Canada officials, former park wardens, leading scientists and multiple indigenous groups and civil society organizations.

In 2015 the WHC requested that Canada invite a joint World Heritage Centre / IUCN Reactive Monitoring mission to review the impacts of development on the property. The first ever reactive monitoring mission took place in the fall of 2016, and the report was released in March 2017.

The Reactive Monitoring Mission confirmed that our concerns about the integrity of the Peace-Athabasca Delta are not "overstated" as Canada originally suggested. The mission characterized the scale of the threats to the natural and cultural heritage of the Peace-Athabasca Delta as "exceptional." The report identified concerns in three areas: longstanding and unresolved conflicts between Aboriginal Peoples and governmental and private sector actors; governance deficiencies, including but not limited to water management across jurisdictions, impact assessment and environmental monitoring; and the effects of observable and anticipated climate change.

The mission concluded that Canada should be given one opportunity to develop a structured and adequately funded response to 17 recommendations, in effect amounting to "major operations." Canada has drafted an Action Plan to restore Wood Buffalo National Park's ecology, which it will present to the World Heritage Committee in February of 2019.

Despite an early reluctance to accept the findings of the Reactive Monitoring Mission, Parks Canada has drafted an Action Plan that proposes actions that address the major requests of the RMM. We commend Canada for putting creative solutions forward. However, the Plan lacks significant details and commitments that will ensure that Actions will be implemented, and that ongoing scientific work will inform the current policies that have led to WBNP's decline. We remain cautiously optimistic but are well aware of Canada's history of proposing grand actions that are not implemented. The Action Plan lacks clear details on implementation and resourcing, and despite the creation of some creative solutions, we are concerned that this Action Plan will remain more of a "plan to plan" with action pushed ever farther into the future.

The key issue affecting the Park is water management. Canada's federal structure and the transboundary nature of the issue mean that decisions regarding water management require coordination between several jurisdictions. The Action Plan outlines a proposed governance structure that will involve each of these jurisdictions and the affected Indigenous communities. If this governance body is to make decisions about water management, it must be empowered to do more than simply study issues and make recommendations to unnamed decisions makers. This governance body must have clear lines of communication to relevant decision-makers, and requirements for these decision-makers to report back to the committee and to the World Heritage Committee if they do not implement one of the committee's recommendations. This body must be able to make recommendations on water quantity and quality, particularly for major challenges that arise outside of the Park.

One of these major challenges is management of oil sands tailings. Currently, there are roughly 250 km² of tailings ponds in the Athabasca Oil Sands region, an area more than twice the size of Paris. Mikisew remain concerned that these massive industrial developments have significant impact on water quality and quantity, through potential leaking of the ponds into the Athabasca River, through altering the water balance of the River by replacing wetlands, and by the draw on water quantity when end pit lakes are filled towards the end of mine life. Provincial policies to manage tailings are insufficiently proscriptive, and don't consider the cumulative impact of several tailings impoundments on the Outstanding Universal Value of the Park.

Provincial jurisdictions have proposed several studies, including a cumulative risk assessment of tailings ponds, to inform their water management policies and their impacts on the OUV of WBNP. However, it remains unclear how these findings influence policies. Canada's implementation plan must stipulate when learnings from these studies will inform management.

The Action Plan represents a crucial opportunity for provincial and federal jurisdictions to collaborate amongst themselves, and most importantly, with the eleven Indigenous communities who have deep cultural and historical ties to the Park. A key mechanism for achieving this is the creation of an institute to support local environmental monitoring, cultural transmission, and stewardship of the landscape. With Environment and Climate Change Canada, we have developed the concept for the Peace Athabasca Delta Institute; a collaborative centre of excellence for environmental monitoring and community-based monitoring. This innovative centre will be operated by the three Indigenous communities of the Peace Athabasca Delta: Mikisew Cree First Nation, Athabasca Chipewyan First Nation, and Fort Chipewyan Métis. It will support crucial scientific monitoring and research to support the Action Plan, as well as monitoring that addresses the information needs of the community. It will support community members' access to the land, cultural retention and empower them to make informed decisions about the landscape.

Given the new attention on the issues facing the Peace-Athabasca Delta and the fresh recommendations from the reactive Monitoring Mission for how to improve the management of these issues, 2019 is a potential turning point for Wood Buffalo National Park. Ultimately, to address the serious situation facing the Peace-Athabasca Delta, Canada must commit to fully implementing the Actions outlined in the Action Plan. They must work with jurisdictional partners to ensure delivery of Actions. They must work with Indigenous communities to improve relationships, understanding

of the Park, and support implementation. They must maintain the momentum gained over the last four years of intensive work to ensure that once the focus of the world moves away, the commitment to change doesn't wane. The World Heritage Committee's decision in 2019 regarding Wood Buffalo National Park will be important for determining whether this comes to pass.

We call for the World Heritage Committee to

- instill a sense of urgency for the implementation of the action plan for Wood Buffalo National Park by requiring a status update and updated implementation plan by the 2020 session of the World Heritage Committee
- commend the State Party for its commitment to the Peace-Athabasca Delta Institute and encourage its implementation by requesting a status update in three years
- confirm that the State Party must fully and effectively include the Mikisew Cree First Nation in the implementation of the action plan for Wood Buffalo National Park, via effective governance arrangements that involve indigenous partners and the relevant decision makers

We also call on Canada to

- develop memoranda of understanding between provincial jurisdictions who have roles in supporting the Action Plan
- establish a trust to support ongoing implementation of the plan.

The Situation of the Kenya Lake System in the Great Rift Valley (Lake Bogoria)

Wilson Kipkazi, Endorois Welfare Council

The Endorois Welfare Council, as an active and concerned Indigenous Community dealing with Natural and Cultural World Heritage properties around Lake Bogoria and as civil society actor complementing the responsibility carried by governments and state bodies, expressing solidarity with other indigenous communities and civil society organizations in Kenya, are concerned with situation around Lake Bogoria.

In 1973, Lake Bogoria was gazetted as a National Game Reserve (NGR) by the Government of Kenya, dispossessing the Endorois indigenous people of their ancestral land –

the land of our sacred shrines, graves of our ancestors, and medicinal herbs. Houses were torched, and compensation received later was a meager KES 3,150 (35 USD) for every household. Other promises made to the Endorois have remained unfulfilled until today whereas since then, Lake Bogoria NGR has generated an average of KES 80 million (800,000 USD) annually from gate collections for the last 45 years, but the Endorois have not benefitted from this revenue.

The Endorois took the government to court in 1997, but after 6 years in and out of courtrooms in Kenya they could not get justice at home. With the help of partners, CEMIRIDE & MRG took the case to the African Commission for Human & Peoples Rights in 2003. After 7 years, a landmark ruling in favour of the Endorois was adopted by the African Heads of State in 2010 in Ethiopia.

The African Commission decided (in March 2010) that the government of Kenya

- Recognize the rights of ownership of the Endorois and restitute Endorois ancestral lands;
- Ensure that the Endorois Community has unrestricted access to Lake Bogoria and surrounding sites for religious and cultural rites and for grazing their cattle;
- Pay adequate compensation to the community for all losses suffered;
- Pay royalties to the Endorois from existing economic activities and ensure they benefit from employment possibilities within the Reserve;
- Grant registration to the Endorois Welfare Council;
- Engage in dialogue with the complainants for the effective implementation of these recommendations.
- Report on the implementation of these recommendations within three months from the date of notification.

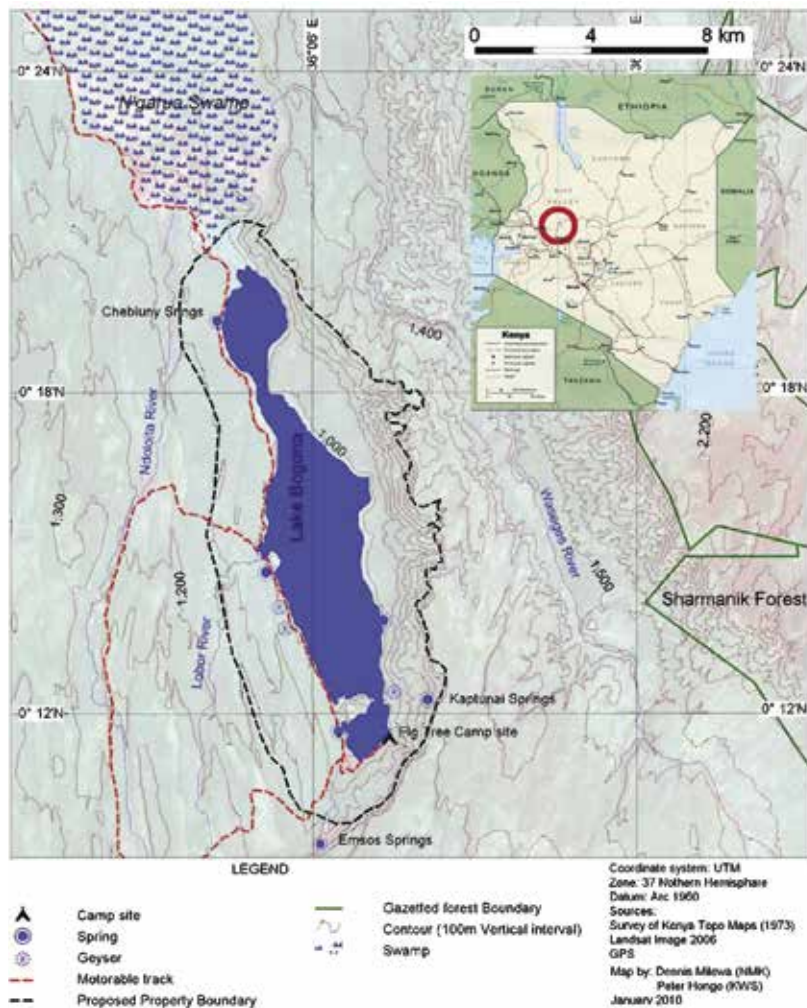


Fig. 1: Lake Bogoria, Kenya.

Map: Dennis Milewa / Kenya Wildlife Service

Against this backdrop, Lake Bogoria was declared a World Heritage Site in June 2011 **without consulting the Endorois and without their Free Prior and Informed Consent**. On the 39th Session of the World Heritage Committee 2015 in Bonn, Germany, the Endorois People were assured that the land is secure despite having been declared a UNESCO World Heritage Site.

The state party was directed that they recognize our Community and incorporate it in the management of the World Heritage Site. However we note with great concern the neglect and poor state of the World Heritage Site, due to failure by the state party to employ the necessary tools required to rehabilitate, manage and conserve the site. The state party has reneged on the promises made during the Bonn, Germany UNESCO meeting.



Fig. 2 Hot springs and geysers burst up from the ground on the shore of Lake Bogoria, attracting flamingos to the algae thriving in the waters.

Photo: thetreasureblog.wordpress.com

We are concerned that the Lake Bogoria World Heritage Site is one of the properties likely to be on the agenda of the 43rd Session of the UNESCO WH Committee, and the Endorois Welfare Council, recognizing the special position of indigenous peoples in both legal and practical respects, we request the World Heritage Committee to ensure that all procedures under the Convention fully respect the rights of indigenous peoples and endorse the Call to Action of the International Expert Workshop on the World Heritage Convention and Indigenous Peoples (Copenhagen 2012) requesting, inter alia,

1. That the World Heritage Committee urgently establish an open and transparent process, with the direct, full and effective participation of indigenous peoples, to ensure it is consistent with the United Nations Declaration on the Rights of Indigenous Peoples;

2. That the World Heritage Committee establish effective and full participation of indigenous peoples, draw a public list of those sites on the States Parties Tentative Lists and on the World Heritage List which may affect the rights, lands, territories or resources of indigenous peoples;
3. That State Parties, UNESCO and the World Heritage Committee provide sufficient financial and other resources to effectively support and advance the full realization of the rights of indigenous peoples in the implementation of the World Heritage Convention and the measures outlined in the Call for Action, and of the provisions of the UN Declaration on the Rights of Indigenous Peoples in all matters concerning the World Heritage Convention;
4. That States Parties ensure the equitable and effective participation of indigenous peoples in the manage-

ment of World Heritage sites within indigenous peoples' lands and territories, and support indigenous peoples' own initiatives to develop administration and management systems;

5. That States Parties ensure that the benefits arising from the designation of indigenous peoples' lands, territories and resources as World Heritage sites are defined by, and genuinely accrue to the indigenous peoples concerned, in a fair and equitable manner.

Key Recommendations

- a) Fully implement the ACHPR decision and return the land to the Endorois;
- b) Ensure the full and effective participation of the Endorois people in the management, governance and benefits of Lake Bogoria National Game Reserve, through their own representative organization (EWC);
- c) Ensure unrestricted access of the Endorois to Lake Bogoria for religious and cultural rites, and for grazing their cattle, in line with the ACHPR Decision;
- d) Do not use now or in the future the World Heritage status of lands to which the Endorois have a recognized claim as a pretext to deny them the restitution of these lands because they are a UNESCO World Heritage site.

A Unique Landscape Under Threat: The 'Three Parallel Rivers of Yunnan'

Submitted by: International Campaign for Tibet



Since the 'Three Parallel Rivers of Yunnan Protected Areas' property was recognized as a UNESCO World Heritage site in 2003, the Chinese state party's ambitions to exploit the region's natural resources have expanded dramatically in scope. The protection of the 'Three Parallel Rivers' property, a global treasure that is among the most biologically diverse temperate regions on Earth, is facing an unprecedented threat from mining, ambitious new infrastructure development, mass tourism, and major damming and hydroelectric power projects. These projects are part of Xi Jinping's plan to link economic corridors under the Belt and Road Initiative (BRI). The recent completion of the world's highest altitude high-voltage power grid¹, linked to the construction of a fully electrified high speed rail line from Chengdu in Sichuan to Lhasa, is one example of how new infrastructure projects increase demand for energy (hydropower) resources, and boost tourism to intensify the ecological pressure on the property area.

It is important to highlight that China's nomination for UNESCO World Heritage status of the 'Three Parallel Rivers' area actually excluded two of the three great rivers (the upper Yangtze and Salween), and only marginally included a section of the Mekong. This was a strategic choice. By excluding the rivers, the state party retained the authority to approve dam construction by the major state-owned dam building corporations without impediment. The nominated and UNESCO approved area constituted a disconnected landscape of deep valleys and mountains, with eight relatively independent geographical areas covering a total area of 1.7 million hectares, including 960,084 hectares of core areas and a buffer zone of 816,413 hectares.² In 2010, the Chinese state further disconnected the protected area, by officially modifying the boundaries of the property to allow existing mines in the protected area to continue op-

erations.³ In approving an intentionally disconnected landscape, UNESCO undermined a foundational principle of biodiversity protection: to protect whole and contiguous landscapes, habitats and ecosystems.⁴

The UNESCO World Heritage Committee has since acknowledged that "it could be argued that the name of the property [Three Parallel Rivers] does not accurately reflect its values"⁵. In 2015, UNESCO raised "questions of coherence and connectivity among and between distinct components"⁶, and even pressed the Chinese state for clarification on the exact location and surface area of all national protected areas, components and buffer zones.⁷

The UNESCO World Heritage Committee and other expert bodies have also raised concerns about dam building and related infrastructure, mining operations, the apparent decline in wildlife, and inadequate tourism planning.⁸ In response to UNESCO concerns about mining in the property, the Chinese government's 2015 report on the State of Conservation reassured the committee saying, "[p]resently, there are no more mining sites within the scope of

¹ State-owned Assets Supervision and Administration Commission of the State Council, 30 November 2018, 'World's hardest power grid project operates in Tibet', http://en.sasac.gov.cn/2018/11/30/c_676.htm.

² Item 7B of the Provisional Agenda: State of conservation of properties inscribed on the World Heritage List, World Heritage 39 COM, WHC-15/39. COM/7B, Bonn, Germany 28 June – 8 July 2015. China drew the UNESCO property boundaries to fully exclude not only riverbeds but the full height of the dams when filled with water.

³ Tilman Jaeger and Bruce Jefferies, May 2013, 'Report on the IUCN Reactive Monitoring Mission to the Three Parallel Rivers of Yunnan Protected Areas (China): 15-25 April 2013', IUCN, <https://whc.unesco.org/en/documents/123412/>, page 1.

⁴ See the strategic goals in the 'Protected Planet Report 2016: How protected areas contribute to achieving global targets for biodiversity', IUCN, UNEP, World Commission on Protected Areas, 2016, <https://www.unep-wcmc.org/resources-and-data/protected-planet-report-2016>.

⁵ Opt. cit., Jaeger and Jefferies, May 2013, 'Report on the IUCN Reactive Monitoring Mission to the Three Parallel Rivers of Yunnan Protected Areas (China): 15-25 April 2013', IUCN, page 4 and 18.

⁶ Refer to Analysis and Conclusion by World Heritage Centre and Advisory Bodies in 2015, <http://whc.unesco.org/en/soc/3236>

⁷ UNESCO World Heritage Committee, 2015, 'Decision: 39 COM 7B.9 - 'Three Parallel Rivers of Yunnan Protected Areas'', 2015, <https://whc.unesco.org/en/decisions/6269>.

⁸ Greenpeace, July 27, 2016, 'China must do more to protect its UNESCO natural heritage sites – Greenpeace', <http://www.greenpeace.org/eastasia/press/releases/forests/2016/China-must-do-more-to-protect-its-UNESCO-natural-heritage-sites---Greenpeace/>.

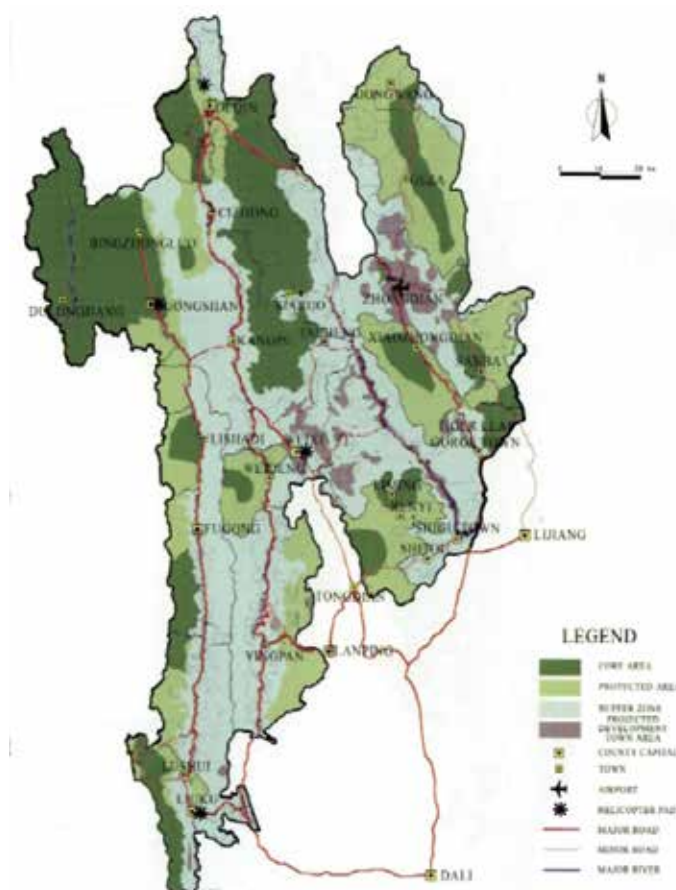
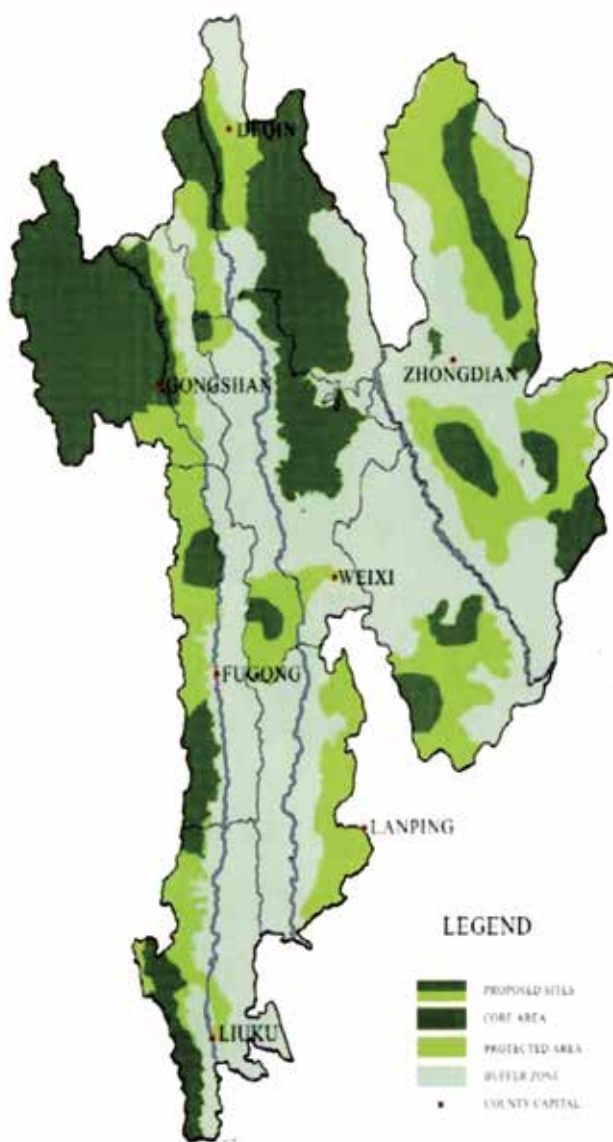


Fig. 1 and 2: Present and planned zoning of the Three Parallel Rivers World Heritage property, excluding the water bodies of the Three Rivers from the inscribed property.

Maps: <http://whc.unesco.org/uploads/nominations/1083.pdf>, ChinaGeography.png en User: Alanmak Alan Makd

the property”.⁹ However, on 27 July 2016, Greenpeace East Asia challenged China’s assurance when it released a report identifying three mines within the Three Parallel Rivers property.¹⁰ Greenpeace found that the three mines caused considerable damage to their surrounding hillsides including deforestation, creating risks of landslides and potential wastewater pollution.¹¹

Following the Greenpeace report, the Chinese government confirmed the existence of the three mining sites, and

again emphasised, “[a]t present, all of them have been shut down”, adding, the “Chinese government promises that there is no and will not be mining activities within the scope of the property and its buffer zone”¹² Despite these assurances, and after numerous UNESCO recommendations for greater scrutiny of mining licenses and activities in previous reports, China’s 2018 report on conservation claimed it had shut down 11 mining operations, nine quarries, and revoked 102 exploration licenses and 23 extraction licenses in the protected area and buffer zones.¹³

It is important to note that only three mines were previously known to the public due to a 2016 investigation by Greenpeace. It remains unclear whether the shutdown operations and quarries have led to any environmental damage. UNESCO should therefore seriously consider investigating any potential damage that may have resulted from legal or illegal mining sites. It should also clarify whether the Chinese state party had previously informed the Committee, in

⁹ People’s Republic of China submission to UNESCO, 26 January 2015, ‘Subject: State of Conservation Report of the Three Parallel Rivers Yunnan Protected Areas World Natural Heritage Site’, <https://whc.unesco.org/document/135083>, page 8.

¹⁰ Yi Lan, 27 July 2016, ‘How mining is threatening China’s precious forests: what we discovered’, Greenpeace East Asia, <http://www.greenpeace.org/eastasia/news/blog/how-mining-is-threatening-chinas-precious-for-forest/57129/>. The report listed three mines operating in the world heritage site: the Xiuwachu Tungsten and Molybdenum Ore Mine (located in the buffer zone), the Sige tungsten and molybdenum ore mine (core zone), and the Sangduguele Tungsten and Molybdenum Mine (core zone).

¹¹ Ibid., Yi Lan, 27 July 2016, ‘How mining is threatening China’s precious forests: what we discovered’, Greenpeace East Asia.

¹² People’s Republic of China submission to UNESCO, November 2016, ‘Three Parallel Rivers of Yunnan Protected Areas’, <https://whc.unesco.org/document/155995>, page 6.

¹³ People’s Republic of China submission to UNESCO, November 2018, ‘Report on the state of conservation of the Three [sic] Parallel Rivers Protected Areas of Yunnan (TPRPA), China,’ page 2.

accordance with §172 of the Operational Guidelines for the Implementation of the World Heritage Convention, about any of these sites.

While the Chinese state's 2018 response to mining in the protected area and buffer zones are a welcome development, China's historical lack of transparency and poor responsiveness to genuine environmental concerns raises serious challenges for related issues of dam construction and infrastructure building in and nearby the inscribed property. This is significant because the 2017 UNESCO report on the Three Parallel Rivers protected area argued, "pressure on the property primarily stems from infrastructure development", as new constructions and increased access to the region alter the ecosystem.¹⁴ UNESCO is not alone in this assessment. Chinese scientists have also acknowledged the risks of unrestrained development in the area, saying in one paper: "[i]n recent years, with Shangri-la economic development, emerging eco-tourism development, large-scale water conservancy engineering and construction project starting, [the] ecological destruction problem is becoming more and more serious", resulting in the decline of large forests, and the degeneration of forests into "thickets, grassland and bare rock land."¹⁵

Despite these concerns, the scale and pace of development in the region has been further accelerated to align with China's strategic and economic objectives. The Tibet-China Power Network is one project designed to spur development. Operationalized in November (2018), the Tibet-China Power Network Project is an ultra-high voltage power grid project with "the largest altitude span in the world"¹⁶ that connects the plateau to China's electricity grid, and supports the construction of the high-speed rail line from Chengdu to Lhasa. Dams in the Three Parallel Rivers property will help generate the energy needed to power the grid.¹⁷

These dam projects are of high political importance to the Party state, because of their valuable water and hydropower energy resources, as well as their geographical positioning connecting Tibet and central China.¹⁸ As a result, environmental protection concerns are secondary to Xi Jinping's political and economic interests, which treat the area as an "important zone for nationality unity, and an integrated corridor linking the 'Belt and Road' (his global infrastructure project) and the 'Yangtze River Economic Belt'".¹⁹

The potential for adverse ecological effects from damming is high, particularly as the gorges of these three rivers are still young and seismically active. Chinese geologists have warned that the effects of tectonic activity in the Three Rivers region have heightened the occurrence, frequency and impact of natural disasters, such as earthquakes and mudslides.²⁰ The area is also vulnerable to impacts of an "ecosystem shift" caused by climate change, China's land use policies, and the expansion of infrastructure in Tibet. Scientists have warned that warming temperatures, together with the boom in infrastructure construction and urbanization, are combining to create irreversible damage to the ecosystem, including the predicted disappearance of large areas of grasslands, alpine meadows, wetlands and permafrost on the Tibetan plateau by 2050.²¹

The 'Three Parallel Rivers' of Yunnan province and its surrounding area is reputed to be the "gene bank of the world", and is acknowledged by the UNESCO World Heritage Committee as: "A truly unique landscape, which still re-

14 UNESCO World Heritage Committee - Forty-first session, Krakow, Poland, 2-12 July 2017, <https://whc.unesco.org/archive/2017/whc17-41com-7B-en.pdf>, page 63.

15 Hui Li, Wenjing Yao, Pengfei Su, Qiuchen Duan, and Guoyan Li, February 2013, 'Shangri-La County Ecological Risk Evaluation Based on RS and GIS', *Advanced Materials Research Online*, Vol. 663, pp 773-776.

16 Xinhua, November 26, 2018, 'The world's highest altitude ultra-high voltage power grid project completed and put into operation', http://www.cnepaper.com/qhkjb/html/2018-11/28/content_4_11.htm.

17 See the official circular promoting hydropower consumption in Southwest China at China Energy Portal, October 19, 2017, 'Chinese official circular on promoting hydropower consumption in Southwest China', <https://chinaenergyportal.org/en/circular-promoting-hydropower-consumption-southwest-china/>. See also China Energy Portal, February 26, 2018, 'Guiding opinions on 2018 energy tasks', <https://chinaenergyportal.org/en/guiding-opinions-2018-energy-tasks/>. The National Energy Administration issues instructions to accelerate the construction of leading reservoirs in Yunnan, Sichuan and surrounding areas to ensure water flow resources are utilized through impounding the water or creating cascades of dams. Information on major infrastructure and grid projects in Yunnan between 2016 and 2020 is available here: [投资云南](#) [Ch. Touzi Yunnan, Yunnan invest-

ment], September 14, 2016, '云南省五大基础设施网络重点建设项目—水网 (2016-2020年)' [Ch. 'Yunnan sheng wuda jichu sheshi wangluo zhongdian jianshe xiangmu - shui wang (2016-2020)', 'Key construction projects of five major water infrastructure networks in Yunnan (2016-2020)', <http://www.yn-invest.gov.cn/XMArticleInfo.aspx?id=12034>. At least 14 listed projects are within the scope of the UNESCO World Heritage property.

18 For instance, a Dechen (Chinese: Diqing) prefectural government report of a meeting of Communist Party officials on January 24, 2018 discussing large hydropower stations in the region described dam construction as having "national" importance and an "important role in guaranteeing national energy security". See 迪庆藏族自治州人民政府 [Ch. Diqing zangzu zizhizhou renmin zhengfu, Diqing Tibet Autonomous Prefecture People's Government], January 24, 2018, '我州与国电金沙江公司达成共识' [Ch. Wo zhou yu guodian jinsha jiang gongsi dacheng gongshi, 'Our prefecture and Jinsha river national electricity company (Jinsha river Xulong hydropower development company) reached a consensus'], <http://www.diqing.gov.cn/qsy/ztdt/904110470937233607>.

19 云南省发展和改革委员会 [Ch. 'Yunnan sheng fazhan he gaige weiyuanhui, 'Development and Reform Commission of Yunnan Province', December 23, 2016, '《云南金沙江开放合作经济带发展规划 (2016-2020年)》解读' [Ch. 'Yunnan jinsha jiang kaifang hezuozuo jingji dai fazhan guihua (2016-2020 nian) jiedu', 'An interpretation of the "Yunnan Jinsha River Open Cooperative Economic Belt Development Plan (2016-2020)"'], <http://www.yndpc.yn.gov.cn/content.aspx?id=909952409048>.

20 Lui Jianqiang, March, 2011, 'China and the world discuss the environment, at fault on the Nu River', *chinadialogue*, <https://www.Chinadialogue.net/article/show/single/en/4174-At-fault-on-the-Nu-River>.

21 Beth Walker, October 23, 2014, 'Tibetan plateau faces massive "ecosystem shift"', <http://www.thethirdpole.net/tibetan-plateau-faces-significant-ecosystem-shift/>, and Jianchu Xu and R. Edward Grumbine, August 28, 2014, 'Building ecosystem resilience for climate change adaptation in the Asian highlands', <http://wires.wiley.com/WileyCDA/WileyArticle.wsid-WCC302.html>.

tains a high degree of natural character despite thousands of years of human habitation. As the last remaining stronghold for an extensive suite of rare and endangered plants and animals, the site is of outstanding universal value.”²² Given the evidence on the dangers of such large-scale damming in a fragile and significant area of international importance, it is imperative that the UNESCO World Heritage Committee use the opportunity of the 43rd Session to seek clarity on the number and type of proposed dam-building in the property and its buffer area in the current Five-Year Plan period until 2020 and beyond.

The Committee should also be persistent in pressing for regular and rigorous scrutiny of the dam building process to ensure sufficient scientific knowledge exists to support evidence-based environmental impact assessments (EIA), and that EIAs are completed before construction begins.²³ This is a serious concern, as the Chinese state itself has acknowledged in its 2018 State of Conservation report, that it is unable to conduct “relatively accurate environmental impact assessment[s]” because of insufficient knowledge of the property’s ecosystem, biological diversity, and wildlife population.²⁴

UNESCO should also continue to promote the adoption of a holistic strategy to managing development and conservation projects in the Three Parallel Rivers region. This is necessary as the Chinese state still views conservation and development as spatially separate and distinct issues that do not impact each other. This has been evidenced by the creation of an inscribed property that is separated into clusters with mines and dams either in between clusters or in close proximity to the protected area and buffer zone.²⁵

Finally, the UNESCO World Heritage Committee must seek to ensure that local Tibetans and residents are not at risk of displacement due to infrastructure construction, mass tourism or other development projects. The UNESCO World Heritage Committee should also urge the Chinese State party to uphold the principle of free, prior and informed consent in relation to all decisions over development of resources in the ‘Three Parallel Rivers’ property, including all mining projects in the property and surrounding areas.

²²UNESCO, decision of the 27th Session of the World Heritage Committee, 2003; online description at <https://whc.unesco.org/en/list/1083>.

²³Opt. cit., Jaeger and Jefferies, May 2013, ‘Report on the IUCN Reactive Monitoring Mission to the Three Parallel Rivers of Yunnan Protected Areas (China): 15-25 April 2013’, IUCN, page 17.

²⁴People’s Republic of China submission to UNESCO, November 2018, ‘Report on the state of conservation of the Thtee [sic] Parallel Rivers Protected Areas of Yunnan (TPRPA), China,’ <https://whc.unesco.org/document/171443>, page 1.

²⁵Opt. cit., Jaeger and Jefferies, May 2013, ‘Report on the IUCN Reactive Monitoring Mission to the Three Parallel Rivers of Yunnan Protected Areas (China): 15-25 April 2013’, IUCN, page 18.

III. Cultural Landscapes and Mixed Sites

The Lake District – A Cultural Landscape Under Threat

Fritz Groothues, Fiona Campbell and Jon Derry (Lakes Watch)

In this report we focus on three separate risks to the Lake District's Outstanding Universal Value: 1) the impact of recreational motor vehicles using unsurfaced tracks on the harmonious beauty of the landscape; 2) the potential harm to the special qualities of the Lake District after the approval of the zip wire project at Honister Slate Mine, 3) the potential disfigurement of Whinlatter Forrest through plans to build a gondola/cable car.

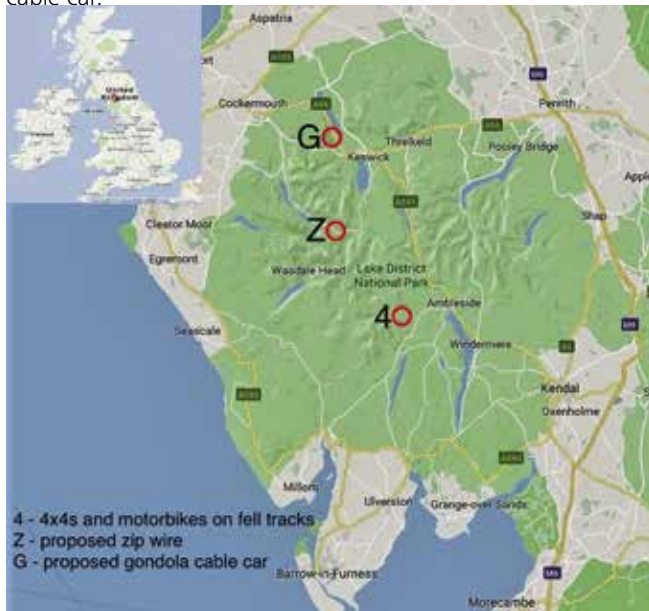


Fig. 1: Map of the Lake District National Park with the three points of threats.

Map: Lakes Watch

Recreational motor vehicles on green lanes

In June 2018 the 5th International NGO Forum on World Heritage at Risk adopted a resolution on the English Lake District, summing up the risks to an outstandingly beautiful area between Conistown and Little Langdale in four points:

1. There is an ongoing degradation of the landscape through recreational off-road vehicles using unsealed tracks, particularly in the Oxenfell-Tilberthwaite-Little Langdale area. Historic tracks, not intended for motor vehicles, are being damaged, and the peace and tranquility of the landscape is being destroyed.
2. The routes used by the recreational motor vehicles lead through the only two sheep farms in this area, destroying

one of the most important Outstanding Universal Values: the fusion between the landscape and the communal farming system.

3. The very place that gave birth to the conservation movement is now the place where conservation efforts are being dramatically reversed.
4. The Lake District National Park Authority is not using its powers to conserve and enhance the natural beauty of the landscape, in particular its peace and tranquillity.

Since then the impact on one of the key attributes of the Lake District's Outstanding Universal Value (OUV), its agro-pastoral tradition, has become even more pronounced: one of the two sheep farmers through whose yards the tracks run has left his farm. The other farmer has written to the National Park Authority (LDNPA), describing the serious problems caused by off-road vehicles to his farm work. It is clear that many sheep farms in the Lake District on or near such tracks are being affected.

The LDNPA has released monitoring data showing a more than 5-fold increase in the number of 4x4s on the Tilberthwaite track since 2002–2004, from 30 a month to 163 a month. The track has now been extensively repaired and could be used by even more recreational motor vehicles.



Fig. 2: 4x4 vehicles on the High Tilberthwaite to Little Langdale Road. Photo: Lakes Watch

Despite vehicle monitoring lasting for over a year and face-to-face surveys, the Authority still maintains that it does not have enough evidence to initiate a consultation for a Traffic

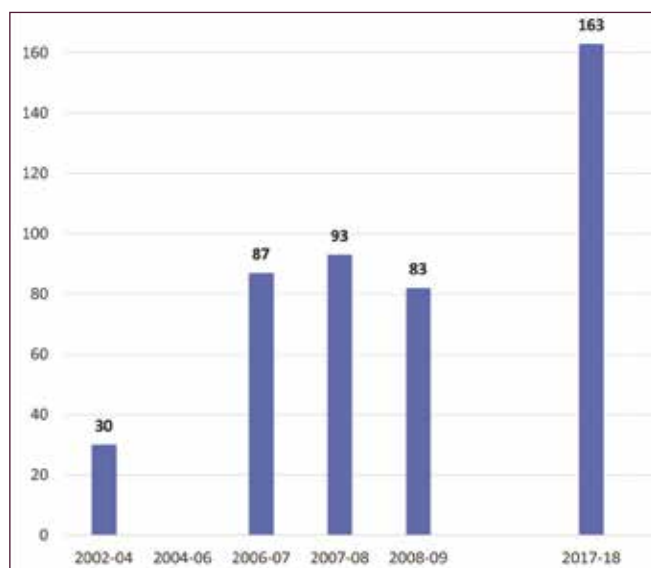


Fig. 3: Number of cars on the High Tilberthwaite to Little Langdale road per month (no data 2004–06 and 2009–16).

Sources: Data for 2002–4: LDNPA Issues and Options paper 2004, section 3.14. Data for 2006 – 2017: released as Bundle 1 by LDNPA after a decision by the Information Commissioner's Office. The number of motor cycles increased from 80 a month to 88 a month.

Regulation Order (TRO). This is a legal instrument to ban non-essential motor vehicles that the government gave National Parks in 2006. Since then it has been used six times by the Peak District National Park and ten times by the Yorkshire Dales National Park. The LDNPA has not imposed a single permanent TRO since 2006. A petition asking for a TRO has now been signed by over 270,000 people.

In their response to complaints about risks to the Lake District's Outstanding Universal Value, the LDNPA and Lake District Partnership have insisted that the current approach which consists in 'managing all rights of way' is adequate. None of their policies even mention the effects of recreational motor vehicles on the natural or cultural heritage. Section 89 of the Operational Guidelines for the Implementation of the World Heritage Convention states that '*dynamic functions present in cultural landscapes ... essential to their distinctive character should ... be maintained*'. Sheep farming is indeed such a dynamic function. The Guidelines further specify that "*legislative*

and regulatory measures ... should ensure ... its (the property's) protection against development and change that might negatively impact the Outstanding Universal Value. At present, far from being controlled, the impact of recreational motor vehicles is being ignored.

The planned zip wire at Honister Slate Mine

Honister Slate Mine sits on the boundary of two Areas of Distinctive Character, Borrowdale and Crummock/Buttermere, as set out in the Lake District National Park's Landscape Character Assessment. It is a working mine and has an extremely unusual concession: the owners have permission to mine and sell pieces of Fleetwith Pike. This mountain forms a distinctive outline when viewed from the west, where it dominates the Buttermere Valley. The craggy north face overlooks Honister Pass.

In 2010 an application was made to site a 1200 metre long zip wire at Honister. This application was subsequently withdrawn and then resubmitted in 2011, when permission for the development was refused on both landscape and nature conservation grounds. Another application was submitted in 2012. This was also refused, with the planners noting, '*the benefit of the proposal in terms of financial support to the business ... is not sufficient to outweigh the unacceptable harm to the special qualities of this landscape*.' In this case, the Sandford principle was clearly and properly applied. (The principle gives greater weight to conservation if there is a conflict between conservation and public enjoyment.) Honister Slate Mine applied again in 2018 and by this time, the Lake District had been inscribed as a World Heritage Site; this bid was also recommended for refusal by the planners. To the astonishment of conservationists, on the 7th of November 2018, the LDNPA Planning Committee resolved to approve the application subject to conditions.

The planners advised in their 2018 recommendations to the Planning Committee that, "*despite the weight we have attributed to the identified benefits, they do not in our view outweigh ... the harm to the special qualities and Outstanding Universal Value of the Lake District*." They further mention in



Fig. 4: Honister zip wire extent of air flight.

Photo: Lakes Watch

their reasons for recommending refusal that an Appropriate Assessment has not been concluded due to a lack of information. Cumbria Wildlife Trust has now written to the Secretary of State to ask him to intervene, on the grounds that, "... the zip wire will cause significant damage to this internationally important wildlife site and, in particular, to the rare, irreplaceable and endangered alpine flowers that grow here". Others have written to the Planning Casework Unit, which has the ability to 'call in' a planning decision so that it can be determined by the Secretary of State.

On reading the documents available on the LDNPA website it is clear that at no point has the UNESCO World Heritage Centre been approached to examine the plans. This directly contravenes subsection 172 of the Operational Guidelines of the World Heritage Convention.

Relevant in this context are the concerns raised by Professor Lynn Meskell of Stanford University that "... most countries seem to care more about getting their historic sites onto the World Heritage List in order to benefit from UNESCO's brand rather than discuss conservation and preservation" (cit. form Shashkevich 2018).

Given that the impacts to the Outstanding Universal Value were clearly highlighted in the planners' report to the Planning Committee this development should not have been granted planning consent without any reference to the World Heritage Centre.

Gondola / Cable Car at Whinlatter Forest

The LDNPA Draft Local Plan Review (published 8th May 2018) is a statutory document containing a series of proposed policies for the management of the National Park over a 15 year

period. One proposal is the creation of Showcase Areas where new commercial tourist attractions will be allowed, provided they generate a 'contribution' to improved transport systems within them. One such area is Keswick and Borrowdale, within which is the (UK Government owned) Forestry Commission visitor centre at Whinlatter Forest. One of several developments being contemplated there is a Gondola cable car, from a base station at the nearby village of Thornthwaite, and then from Whinlatter up two adjacent hills. We consider that the inclusion of this proposal within the Draft Local Plan contravenes section 172 of the Operational Guidelines for the Implementation of the World Heritage Convention, which requires that notice of new constructions that may affect the Outstanding Universal Values of a World Heritage Site are brought to the attention of the World Heritage Committee before drafting basic documents, to enable the Committee to assist in the decision-making process.

The Gondola proposal is being actively supported by the LDNPA and presented as a 'sustainable transport solution' which will allow improved access for increased visitor numbers to an expanded Whinlatter 'Mountain' Centre - and prevent high levels of congestion by cars in the narrow lanes of Braithwaite village. Potentially simpler and more effective transport management options (traffic lights, road widening, new road) have not been considered however – neither has the option of refusing major new developments at Whinlatter. The Gondola cannot (and won't) stop people using the road to reach Whinlatter. In reality it is a 'pleasure ride / mountain bike lift' system designed mainly to generate revenue. The Forestry Commission and a local landowner are behind the plan, and the LDNPA have confirmed the existence of a feasibility study (freedom of information requests have so far been rejected on the grounds of commercial confidentiality).

A gondola is also depicted with the notation 'Discover new ways to travel' in the LDNPA's 30 year 'Smarter Travel' vision document (September 2018) suggesting the aspiration for the use of gondolas more widely in the Park perhaps? More strategic ways of managing traffic (like a congestion charge) are not mentioned in the document, presumably because this would be against the wishes of the tourist industry.

The threat of the Gondola to the landscape around Whinlatter and the villages of Thornthwaite and Braithwaite is obvious, not only from the 'attraction' itself (three cable systems with numerous pylons, gondolas and a large base station just outside Thornthwaite), but also

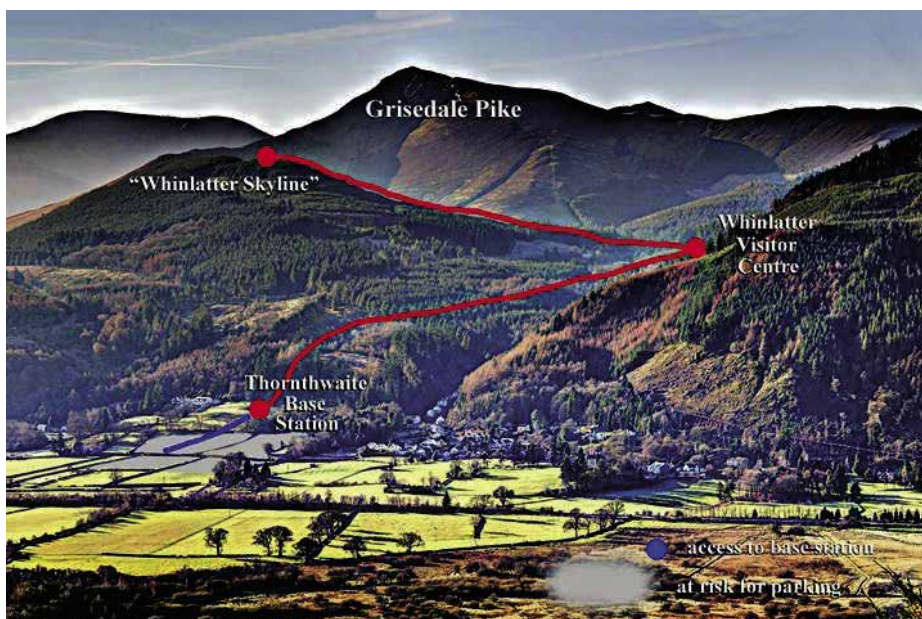


Fig. 5: Planned gondola route.

Photo: Lakes Watch

the inevitable infrastructure surrounding the base station (car and coach park, toilets, café etc). Such a development would also represent a dangerous precedent for subsequent other 'attractions' whose true motivations are masked by the spurious veneer of 'sustainable transport solutions' given them by the LDNPA.

Summary and recommendation

Our worry is that the 'Cultural Heritage' aspect of the WHS designation is being willfully misinterpreted by both private investors and the LDNPA to justify an increasingly aggressive tourist agenda which runs contrary to the intention and spirit of the designation.

We consider that support for both the gondola and zip-wire proposals and the lack of action regarding the control of 4x4 and motorbike activity demonstrate a failure by the LDNPA to recognise the importance of the WHS as a heritage asset of the highest significance.

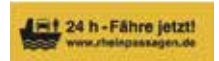
We ask the UNESCO World Heritage Committee to ensure that the LDNPA puts in place effective measures for the protection of the Lake District's OUV against current activities and future developments.

References

Shashkevich, A.: Stanford anthropologist calls for change at UNESCO and its World Heritage program. Stanford News November 19, 2018. <https://news.stanford.edu/2018/11/19/>

Multiple Threats to the Upper Middle Rhine Valley

Klaus Thomas, Rheinpassagen Citizens' Initiative



We comment on the Report on the State of Conservation of the Upper Middle Rhine World Heritage by the State of Rhineland-Palatinate (RLP, Land Rheinland-Pfalz, a first level sub-national entity of the Federal Republic of Germany¹), dated 14 November 2018.

Permanent Rhine Crossing

(item II.3, Page 2, numbers 1–3 of the SoC Report)

By Decision 34COM 7B.87 the World Heritage Committee took note of the Environmental Impact Assessment, the Traffic Evaluation, and the Visual Impact Study of a planned road bridge across the Rhine river near St. Goar / St. Goarshausen. The model serving as the basis for the Study shows a bridge starting from the roads at river level and crossing the river at low altitude. This model is misleading. A bridge of that design cannot be built because

1. According to legal regulations, the lower edge of the bridge must be at least 15–20 meters above the local river level (9.10 m above high-water level 2) in order to guarantee ship passage. Access ramps starting from river level would have to be steeper than allowed.



Fig. 2: The winning model of the planned bridge in a computer animation, with the realistic height indicated by red lines.

Photo: heneghan peng architects / adapted by Klaus Thomas

2. Access ramps to the bridge are not shown in the Visual Impact Study of the bridge.
3. The river valley is very narrow at the planned location of the bridge. Access ramps could be built only in Protected Landscapes on the valley slopes which would lead to an in-

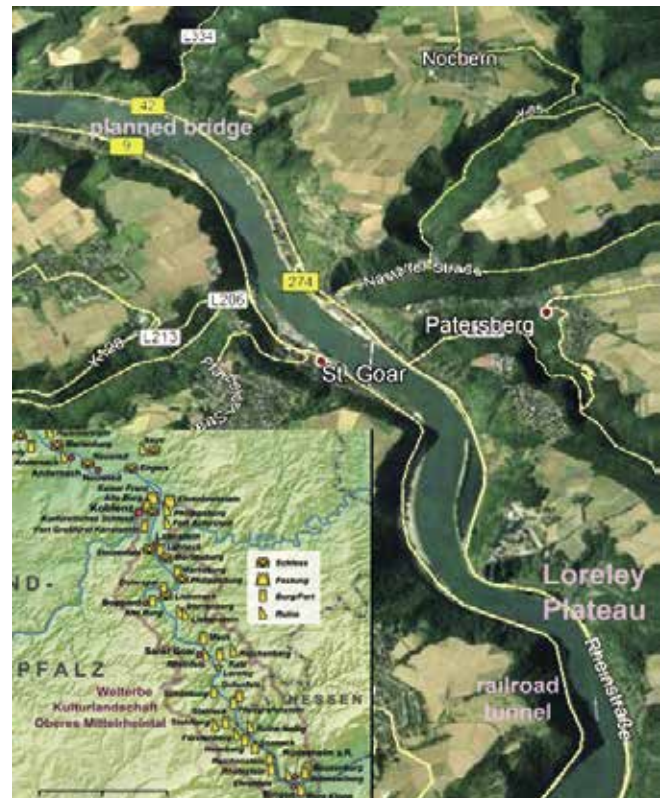


Fig. 1: The central part of the Upper Middle Rhine Valley with the three locations of controversial activities.

Map: Google Earth / Stephan Doempke

acceptable visual disfiguration of the valley and be incompatible with this status.

4. New expert opinions clearly demonstrate that the bridge will serve inter-regional, not local traffic as alleged by the government of RLP (see Fig. 3 overleaf). Two road networks will be connected by the bridge, and access roads to the German national highway network are explicitly required by government specifications.
5. According to the Scientific Service of the State Parliament of RLP, the figures used in the Traffic Evaluation cannot be checked, are not plausible, or are incorrect. However, they are used as a basis to present the visual and traffic impact of the bridge.
6. Living conditions for the inhabitants of the valley will considerably deteriorate. Four river ferries - essential elements of the cultural landscape - will become uneconomic and cease operation, and the bridge will become the only way to cross the river. Located several kilometers outside the vil-

¹ The states are the highest executive authorities in Germany for both cultural heritage and nature conservation.

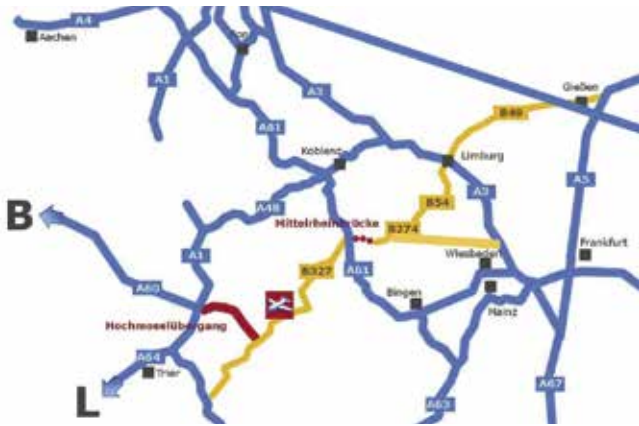


Fig. 3: The Middle Rhine Bridge would connect roads for supraregional and international long-distance traffic. It is integrated into a broad national transport network and will lead to a significant increase of traffic on the roads along the Rhine.

Map: BI Rheinpassagen

lages, it cannot be used by pedestrians and bicyclists. The State Government is aware of this, but it has not been investigated how local inhabitants should cross the river in the

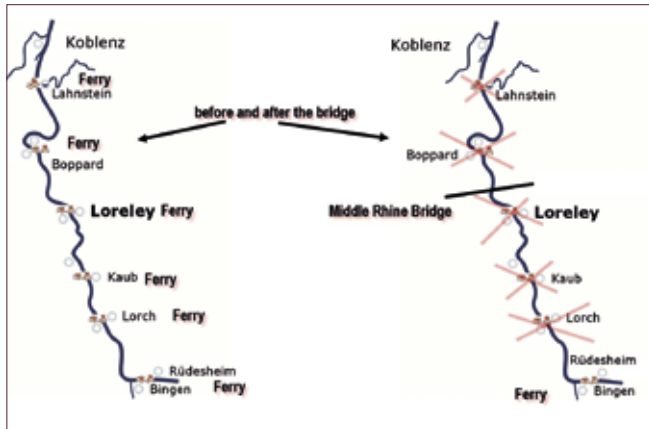


Fig. 4: A bridge would force all river ferries in the Upper Middle Rhine valley out of business except one. Since it would be too far away for pedestrians and bicyclists, people living on the left and right banks will effectively be separated. Graphic: Klaus Thomas

future.

- The Management Plan for the Upper Middle Rhine Valley World Heritage requests to determine the optimal form of a Rhine crossing for all users (cars, trucks, bicycles, pedestrians etc. (Master Plan 2.2, p. 21). A regional mobility concept should be drafted. This has been determined in the Government Plan of RLP for this legislature, but not realized yet.

We ask the UNESCO World Heritage Committee to urge the State Party of Germany, through the State of Rhineland-Palatinate, to undertake the following measures:

- To adopt a mobility concept for the Middle Rhine Valley, including an evaluation of the environmental impact of long-distance transport and traffic to the highways as well as additional traffic due to the termination of the ferry service;

- To redo all previous expert opinions on road traffic (including the bridge design competition) based on applicable legal regulations and credible statistics;
- To formally acknowledge the ferries as an essential part of the Outstanding Universal Value of the cultural landscape of the Upper Middle Rhine Valley.

Noise reduction

(item II.3, Page 2 of the SoC Report)

When inscribing the Upper Middle Rhine Valley in the World Heritage List in 2002, UNESCO already stated: „However, the railways in the valley contribute to the noise pollution in the valley, which is a problem that needs to be mitigated“ (WHC-11/35.COM/8E, p. 44, 2011). Since then railway noise has dramatically increased. None of the measures taken against it has shown any effect. The reduction of this hellish noise has been repeatedly requested by UNESCO and ICOMOS.

The Master Plan describes very clearly the railway noise and the effects on people and nature: “Railway noise is a reason for people and businesses to leave” (p. 28). Or: “The noise of freight trains is unbearably high for the people in World



Fig. 5: Trains pass right through villages and in front of houses, as here in Bacharach. Photo: Stephan Doempke

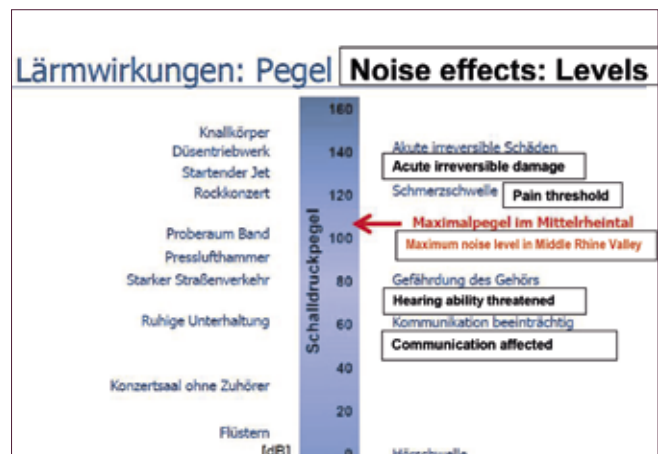


Fig. 6: Maximum noise levels from trains in the valley approach the pain threshold and lead to a permanent hearing damage. Graphic: BI Rheinpassagen

Heritage Valley. Peak levels of more than 100 dB (A) include health impairments that not only affect the quality of life and leisure, but increasingly jeopardize tourism and the business location" (2.7 p. 33).

The Master Plan demands "more quietness in the world heritage." A fast and effective mastering of the noise problem is therefore an elementary prerequisite for the development of good future prospects for the World Heritage Upper Middle Rhine Valley." (p. 33) Instead, the noise has been increasing.

Each freight train generates a noise level between 74 dB (A) and over 100 dB (A). Noise endangers human health (see Master Plan). The number of trains has quadrupled since the inclusion of the Upper Middle Rhine Valley in the World Heritage List in 2002. By 2030, the Federal Railway Authority (Eisenbahn-Bundesamt) expects a further increase of rail freight traffic by 30%. All measures taken so far have not reduced the noise.

In order to reduce noise levels, freight trains should be equipped with new, quieter brakes. According to a study commissioned by the Federal Ministry for Traffic, however, at least 50 % of all freight wagons in a train must be quiet before the human ear can perceive a reduced noise. In Europe, only Germany installs new breaks, but German wagons make only 14% of all European wagons, and the percentage of international wagons in the Rhine valley is very high.

Unimplemented improvements:

1. The Master Plan foresees speed reductions and/or night driving bans. Expert opinions commissioned by the state of Rhineland-Palatinate confirm the admissibility and the effect.
2. Removing extra loud wagons from a train could reduce noise peaks.
3. The plans for the construction of a new tunnel near St. Goar/Oberwesel have been discontinued. There is no noise reduction near the Loreley.
4. The most effective solution for noise reduction is an alternative line replacing the one in the Middle Rhine Valley. However, priority for constructing a new line has been given to the Elbe Valley, which means that a new line replacing the Rhine valley line will not be planned before 2030 and built before 2055.

As a result, railroad noise in the Rhine valley is increasing sharply and will continue to increase.

We demand that the number of freight trains in the Upper Middle Rhine Valley World Heritage Site is to be reduced to the level of 2002 in order to actually reduce rail noise.

Upgrading of the railway tunnels

(Item IV. 2, Page 6 of the SoC Report)

At one of the most valuable and sensitive sections of the Upper Middle Rhine Valley, straight across from the Loreley Rock to the south, there are three railway tunnels which are old and in need of repair. Plans to build a new tunnel to replace these old ones have been cancelled for reasons of cost. Repair of the old tunnels, however, will require massive concrete reinforcements on the rocky slope of the "Kammereck" facing the Rhine just



Fig. 7: Massive slope reinforcements using concrete, such as this one near Boppard, will become commonplace when the tunnels will be stabilized, and deface the picturesque valley beyond acceptable limits. Photo: Klaus Thomas

south of the Loreley Rock. One of the most picturesque vistas from the Loreley Rock is in imminent danger of destruction. Even the State of Rhineland-Palatinate considers this plan to have "a high conflict potential with the authenticity, visual integrity and Outstanding Universal Value of the World Heritage Property" (SoC Report IV.2, page 6).

We demand that the repair of the railway tunnel must not harm the OUV of the Upper Middle Rhine Valley World Heritage.

Additional Issues not mentioned in the SoC Report: Loreley



Fig. 8: The so-called "myth room" (seen on the right) has been cut into the Loreley rock in order to remain under the height of trees. Photo: Stephan Doempke



Fig. 9: The Loreley plateau, formerly a green space, is disappearing under concrete. Photo: Klaus Thomas

“... thanks to various previous attempts to protect the landscape and its historical monuments, the landscape has remained largely untouched. Many of the features and elements

face water to seep away; it must now be drained. Buildings have been built into areas that should never have been built according to a prior sightline study. Further areas are to be built and sealed with roads, parking lots and a hotel with a floor area of 28,000 m².

A new, bigger Loreley stage has been built in place of the previous one, which was under monument protection. For its larger area requirement a small forest was cleared. Its huge, white tent roof, not adapted to the colours of the landscape and in violation of design regulations, is now visible from the Rhine Valley to the north and from all viewpoints around. The application for inclusion in the World Heritage List describes the “postcard view” on the Loreley rock. This view is now destroyed by the stage roof. The newly-planted trees will not grow to a height that would cover the roof from view.



Fig. 10 and 11: The glaring white roof of the new concert hall can be seen from far both from the river and all viewpoints around, such as this one with Katz Castle in the foreground. Photos: Stephan Doempke



Fig. 12: A computer visualization of the “crystal” which will be placed on top of the “myth room”, replacing the narrative of the Loreley legend with kitsch and obscurantism. Image: werkteam-loreley / rendertaxi

Close to the escarpment to the Rhine, a so-called “mythic room” with a “crystal tower” on top is being built in the area in which the sightline study does not permit construction. With a height of more than 15 meters, this building will extend beyond the height of trees, be visible from afar in every direction, and dramatically alter the view of the Loreley rock.

that give the area its authenticity have been preserved” (WHC-11/35.COM/8E, p. 44). About one third of all animal and plant species detected in Germany have settled here.

Now the plateau on the Loreley Rock has been completely dug over and concreted so that none of the described animal or plant species has survived there or will live in the future. The sealing of the former landscape protected areas does not allow the sur-

Fig. 13: The summer bobsleigh track, instead of being removed, has been supplemented by a children’s playground, picnic area and mini golf.

Photo: Klaus Thomas



No environmental impact assessment was carried out either on the Loreley plateau or on the expansion of the Loreley stage.

Repeated ICOMOS reports and UNESCO decisions have demanded the dismantling of the summer bobsleigh track on the Loreley Plateau. This, however, has never happened. On the contrary, now an additional playground, miniature golf course and picnic area have been built, destroying untouched nature.

We demand to

- 1. return the Loreley Stage to its original protected monument state;**
- 2. dismantle the summer bobsleigh track, playground, miniature golf course and picnic area;**
- 3. ensure with immediate effect that no further be available for the construction of buildings on the Loreley Plateau;**
- 4. take any further intervention only with full respect of nature conservation.**

Management Plan and ICOMOS

(items II. 8, Page 4, and III, Page 5, second-to-last paragraph SoC Report)

The new Loreley Plateau is shaped by a "Steering Group". Among its members is ICOMOS Germany together with the investor and the state of Rhineland-Palatinate. The steering group supports the construction of a so-called Glass Rock, a "myth room" building with a glass structure in the form of a crystal on top of it. Together they will be more than 15 meters high and significantly affect the visual axis from all directions. They are built in the space where buildings are not allowed according to the visual axis study. With the support of ICOMOS, however, a new visual axis study has been issued which now confirms that the Glass Rock does not disturb the visual axis.

With participation of ICOMOS Germany, the Steering Group decided, after consulting with the ICOMOS Monitoring Group, that the World Heritage Secretariat of RLP should give a positive opinion on the construction of the "Glass Rock". Its impact on nature and the visual axes have not been reported.

Under the leadership of ICOMOS members, in 2010 the "Assessment of a Bridge, Tunnel or Ferry Connection in the Middle Rhine Valley near St. Goar" (<https://www.loreleyinfo.de/gutachten/ISB-RWTH-Aachen/verkehrliches-gutachten.pdf>) and the "Statement on the Visual Impact of the Planned Rhine Bridge between Wellmich and zu Fellen on the Integrity of the World Heritage Upper Middle Rhine Valley" (<http://services.arch.rwth-aachen.de/forschung/visual-impact-study-oberes-mittel-rheintal-de.pdf>) were carried out. The conclusiveness of these reports is poor, and they contain inaccurate and misleading information (see item "Permanent Rhine crossing" above).

ICOMOS member Prof. Dr. Kloos has been commissioned by the state of Rhineland-Palatinate to develop a new management plan for the Upper Middle Rhine Valley World Heritage. Prof. Kloos has publicly described the interventions on the Loreley Rock as an "exemplary project for development of the World Heritage Valley".

In the Management Plan, all matters of relevance to the Upper Middle Rhine Valley are considered. This requires a neutral assessment of planned interventions. ICOMOS Germany, however, is directly involved in all planning, building construction, evaluation and reporting to the State of RLP concerning all key matters affecting the World Heritage. Prof. Kloos has described the Management Plan as an "informal planning tool". The Master Plan in contrast foresees that the Management Plan should have a binding legal effect through the adoption of its statements into laws and decrees, the State Development Plans, Regional Plans, Land Use Plans and other binding regulations (Master Plan p. 21: 2.2 Management Plan). It is obvious that the Management Plan drafted by Prof. Kloos will come into conflict with the stipulation of the Master Plan.²

We demand that ICOMOS Germany be excluded as a party in any assessment, study or evaluation of any plan or intervention or state of conservation of the World Heritage Site Upper Middle Rhine Valley.

² https://mwkel.rlp.de/fileadmin/mwkel/Broschueren/Masterplan_Welterbe_Oberes_Mittelrheintal.pdf

Austria: Semmering Railway and Surrounding Landscape in Danger

Christian Schuhböck, Alliance for Nature

ALLIANCE FOR NATURE

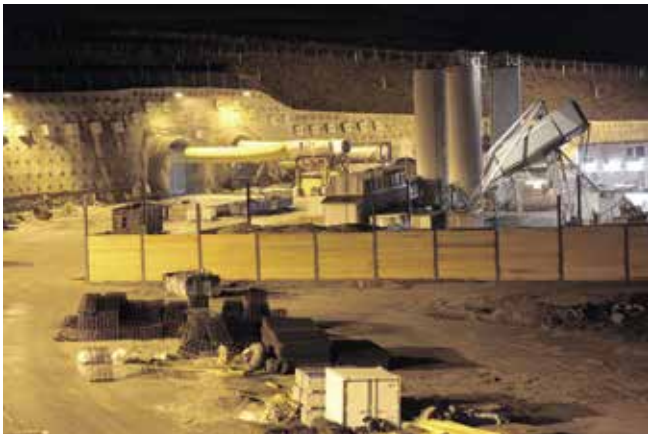


Fig. 1: The construction site of the Semmering Base Tunnel new at Gloggnitz station, inside the originally inscribed World Heritage Area. Photo: Alliance for Nature

The “Semmering Base Tunnel new”, which is currently under construction, will cause a significant impact on the UNESCO World Heritage area “Semmering Railway with surrounding landscape”. According to documents for the environ-

mental impact assessment, around 38 million litres of water per day and in the long term are to be withdrawn from the natural water budget of the region after the two-storey, approximately 28-kilometre-long railway tunnel will have been built. The authenticity and integrity of the Semmering Railway World Heritage Site will be lost.

Furthermore, UNESCO has not been made aware of the fact that, in order to facilitate the tunnel project, the Austrian State Party has reduced the World Heritage Site to less than two per cent of the area inscribed by the UNESCO World Heritage Committee in 1998; otherwise, UNESCO would have asked the Republic of Austria to re-nominate the site (in accordance with § 165 of the UNESCO World Heritage Guidelines). UNESCO must therefore classify the Semmering Railway World Heritage as endangered, and add it to the “List of World Heritage in Danger”.

1.1. The nomination of the “Semmeringbahn – cultural landscape”

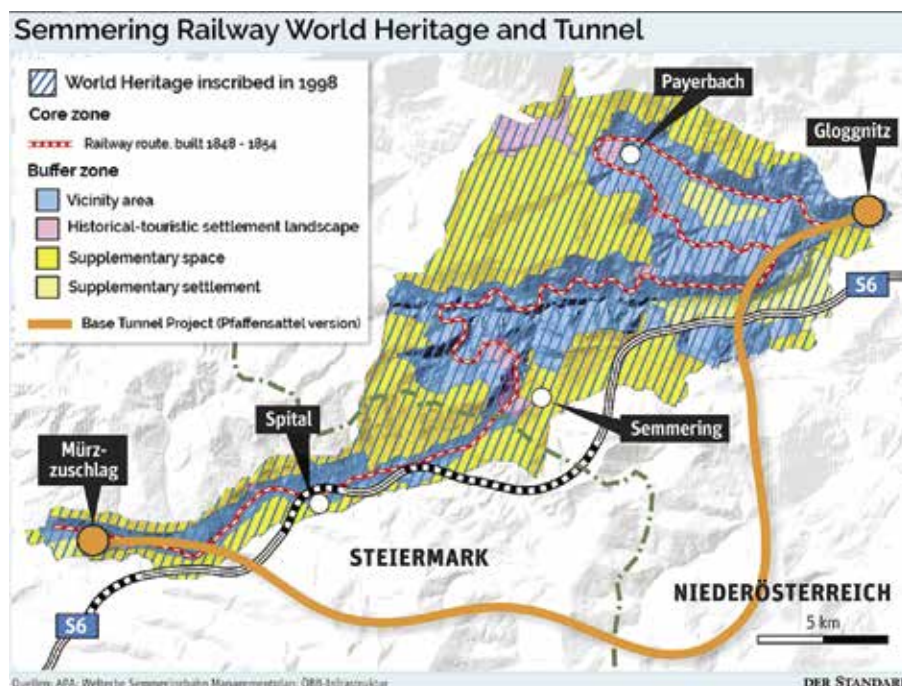


Fig. 2: The route of the new Semmering Base tunnel new, with its entrance and exit inside the inscribed World Heritage area but outside the later controversial “core zone”. Map: Der Standard / legend adapted by World Heritage Watch

In 1995, the Republic of Austria submitted a document entitled “Semmering railway – cultural site – Semmeringbahn-Kulturlandschaft” to UNESCO for nomination as a World Heritage Site¹. In this document, the Semmering Railway was described on 8 pages and its surrounding landscape (including villas and hotels) on 39 pages; no subdivision into “core zone” and “buffer zones” was made.

1.2. Evaluation by ICOMOS

As an Advisory Body of UNESCO, ICOMOS subsequently carried out the evaluation of this potential World Heritage Site. Although the evaluation document is only entitled “Semmeringbahn (Austria),” in fact both the

¹ <http://whc.unesco.org/uploads/nominations/785.pdf>

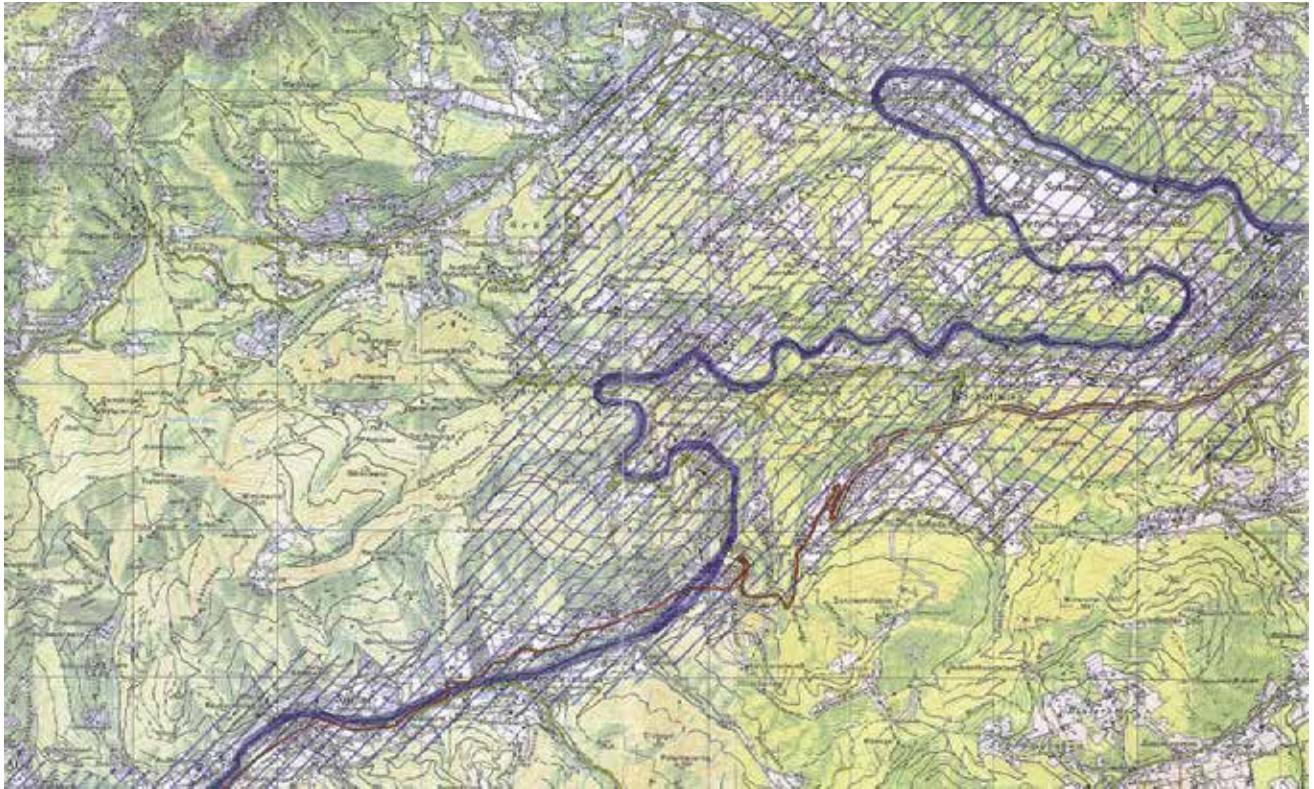


Fig. 3: This map is part of the official document submitted to UNESCO in 1995 for the World Heritage nomination of the "Semmeringbahn – Cultural Landscape".
Map available from <http://whc.unesco.org/uploads/nominations/785.pdf>

Semmering railway and its surrounding landscape were examined and evaluated for their outstanding universal value. ICOMOS noted in this document that no proposals on the category of the World Heritage Site were made in the nomination dossier. As far as the category is defined in Article 1 of the World Heritage Convention, the Semmering railway is referred to as a "site". However, according to ICOMOS, it could also be regarded as a "cultural landscape" in accordance with § 35–39 Operational Guidelines 1995.

In any case, ICOMOS concluded that the Semmeringbahn with its surrounding landscape meets criteria (ii) and (iv) for inclusion in the World Heritage List. ICOMOS describes the characteristics of the potential World Heritage Site as follows:

„The railway line over the formidable Semmering Pass was the first major project of this kind in the world. Building of the line led to the creation of a cultural landscape of villas and hotels over much of its route that is an outstanding example of the sympathetic insertion of buildings of high and consistent architectural quality into a natural landscape of great beauty.” (ibid.)

With this formulation ICOMOS described the Semmering railway and its unfolding cultural landscape with villas and hotels in a natural landscape of great beauty, without differentiating values between the Semmering railway and its surrounding country. Both the Semmering railway and its surrounding landscape meet criteria of exceptional universal value – in fact

equivalent. Accordingly, the recommendation of ICOMOS of October 1998 also states:

- *That this property be inscribed on the World Heritage List on the basis of criteria ii and iv: Criterion ii: The Semmering railway represents an outstanding technological solution to a major physical problem in the construction of early railways. Criterion iv: With the construction of the Semmering railway, areas of great natural beauty became more easily accessible and as a result these were developed for residential and recreational use, creating a new form of cultural landscape.” (ibid.)*



Fig. 4: The cultural landscape of the Semmering Railway, with the village of Klammm and the ruin of its fortress, the Wagnergraben Viaduct, and a landscape of villas.

Photo: Christian Schuhböck

If the Republic of Austria had nominated only the railway line (without the surrounding landscape) as a world heritage site, and had ICOMOS therefore only evaluated the railway line, criterion (iv) referring to the type of buildings, architectural or technological ensembles or landscapes, would not have been applicable.

1.3. Decision of the UNESCO World Heritage Committee

In December 1998, the UNESCO World Heritage Committee followed the ICOMOS recommendation and included the Semmering railway, along with its surrounding landscape, in the World Heritage List. Document WHC-98/CONF.203/18² states under “The Semmering Railway” (N° 785):

The Committee inscribed the site on the basis of criteria (ii) and (iv):

Criterion (ii): The Semmering Railway represents an outstanding technological solution to a major physical problem in the construction of early railways.

Criterion (iv): With the construction of the Semmering Railway, areas of great natural beauty became more easily accessible and as a result these were developed for residential and recreational use, creating a new form of cultural landscape.

Several delegates supported this inscription as it reflected the inclusion on the World Heritage List of new categories of properties. The UNESCO World Heritage Committee thus followed exactly the recommendations of ICOMOS and noted that new categories of goods have thus found their way into the World Heritage List. Prof. Dr. Bernd von Droste zu Hülshoff, at that time Director of the UNESCO World Heritage Centre, spoke of an “outstanding railway landscape as a world heritage site” and of “the Semmering Railway with this surrounding harmonic recreational landscape as the first UNESCO Railway World Heritage Site”.

2. The dismantling of the UNESCO World Heritage

In 2005, as a result of the election campaign for the regional parliament of Styria, a decision was taken at national government level to build the controversial 28 km long, twin-tube “Semmering Base Tunnel new” (SBTn) between Gloggnitz (Lower Austria) and Mürzzuschlag (Styria). This is when the gradual demolition of the UNESCO World Heritage Site began.

On the one hand, Gloggnitz and Mürzzuschlag stations were removed from monument protection – probably because the planned Semmering Base Tunnel’s entry and exit are in these areas. On the other hand, the Styrian Protected Landscape Reserve of “Stuhleck-Pretul”, which was decreed in 1981, was reduced to about a third of its original size in 2007 – in exactly the area where one of the construction sites of the SBTn (Fröschnitztal) was to be built – although ICOMOS states in its evaluation report:

Qualities

The railway line over the formidable Semmering Pass was the first major project of this kind in the world. Building of the line led to the creation of a cultural landscape of villas and hotels over much of its route that is an outstanding example of the sympathetic insertion of buildings of high and consistent architectural quality into a natural landscape of great beauty.

ICOMOS comments

At the meeting of the Bureau in Paris in June 1996, ICOMOS proposed that further consideration of this nomination be deferred to await the completion of the TICCIH comparative study (see above). This proposal was accepted by the Bureau, which also requested the State Party, at the request of ICOMOS, to supply more detailed maps and information regarding the cultural landscape protection legislation in Lower Austria and Styria. The study has been completed and the State Party has complied with the ICOMOS request for supplementary information.

3. “Retrospective Inventory” or new nomination?

As part of the “Retrospective Inventory Project” in 2008, Austria has introduced a zoning of the Semmering Railway World Heritage Site. Only the track of the Semmering Railway with its various constructions was designated as a so-called “core zone”, and the surrounding landscape – the entire remaining area of the World Heritage – as a “buffer zone” (with four different grades of significance)³. This map was finally presented to the UNESCO World Heritage Committee in June 2009 at its 33rd Session in Seville, where it was included in document WHC-09/33.COM/8D. Austria now considers only the Semmering Railway to be the inscribed world heritage site, and has proclaimed that the “landscape surrounding has never been part of the world heritage” – which is demonstrably wrong.

As a result, it is now argued in Austria that UNESCO has agreed to the sectioning of the 8,861 ha World Heritage Site “Semmeringbahn with surrounding landscape” into a “core zone” of 156 ha (the track of the Semmeringbahn) and a “buffer zone” (with four different grades of significance) of a

² <http://whc.unesco.org/en/decisions/2746>

³ http://www.stadtland.at/htm/aktuelles/sem_mp-engl_100824.pdf, p. 10

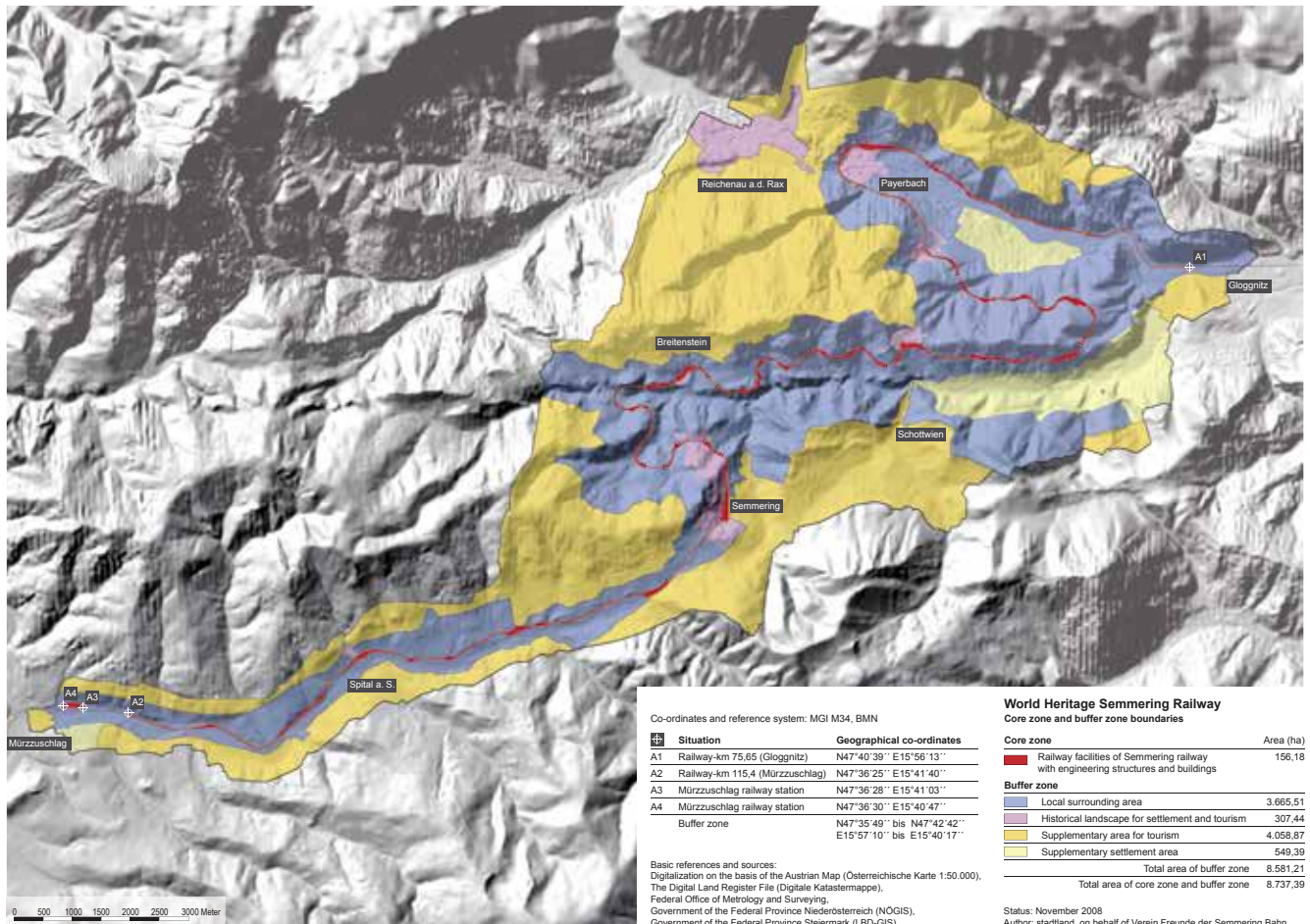


Fig. 5: Map from the controversial Management Plan of 2010 – the year when the environmental impact assessment examination procedure for the “Semmering Base Tunnel new” was initiated. This demarcation and subdivision of the World Heritage Area was not decided by the UNESCO World Heritage Committee in 1998.

total of 8,581 ha (the surrounding landscape). (The total area was also reduced by 124 ha in the process.)

However, in accordance with § 165 of the Operational Guidelines for the World Heritage Convention, the Austrian State Party should have re-nominated the site. § 107 OG stipulates that an inscribed World Heritage consists only of the core zone, and by dividing the nominated property into a very small core zone and a very large buffer zone, the nominated property was reduced in size by more than 98%. According to § 165 OG, such a major change of boundaries requires a full re-nomination of the property.

4. Requests to the World Heritage Committee

Due to this situation and the significant impairment of the “Semmeringbahn with surrounding landscape” World Heritage

Site, the UNESCO World Heritage Committee must point out clearly and state by Decision that

1. in 1998, by Decision of the UNESCO World Heritage Committee, not only the Semmering Railway but also its surrounding landscape was declared a World Heritage Site, with a total size of 8,861 ha;
2. the 2009 map “World Heritage Semmering Railway – Core zone and buffer zone boundaries” does not correspond with the Decision of the World Heritage Committee in 1998;
3. the construction of the Semmering Base Tunnel new through the World Heritage Site is not in compliance with the UNESCO World Heritage Convention and its Operational Guidelines, and
4. the Semmeringbahn with surrounding landscape is placed on the List of World Heritage in Danger

The Prosecco Region: A Contentious UNESCO World Heritage Nominee

Gianluigi Salvador, Pesticide Action Network Italy

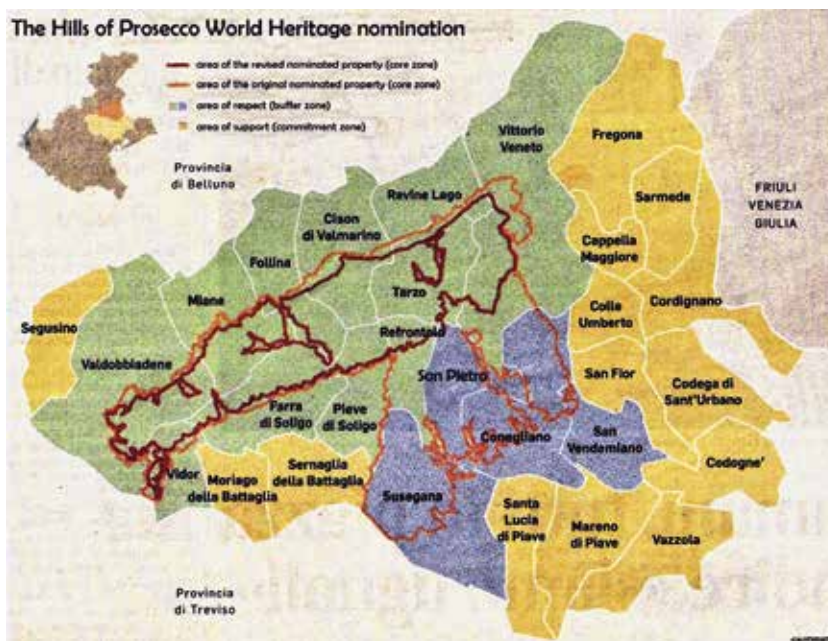


Fig. 1: The original and revised nominated property in the Prosecco Region of northern Italy, with the 11+4+14 municipalities

Map: Treviso Il Gazzettino 9 December 2018

Known for its world famous sparkling wine, Prosecco DOCG in Treviso (Italy) has been nominated in 2017 to become a UNESCO World Heritage. The UNESCO World Heritage Committee's discussion regarding its inscription in the World Heritage List took place in July 2018, and although the initial evaluation proposed by ICOMOS was to "NOT TO INSCRIBE" ¹, the Committee called for a revision of the application dossier. The final decision will be taken at the Annual Session of the World Heritage Committee in July 2019 in Baku.

The nomination of Prosecco DOCG has been highly contentious as the region is characterized by intensive wine production. Vineyards cover both urban and natural areas over the entire area where pesticides are intensely used. The perplexities for this strong viticultural expansion in the DOCG Prosecco was already described in the ICOMOS-UNESCO 2018 evaluation² document, where one of the many reasons given to reject last year the candidature of the Prosecco Hills of Conegliano and Valdobbiadene is: "The broader vineyard landscape of the prosecco has seen at dramatic increase in this production area in recent times". The vineyard area in the DOCG prosecco has grown fivefold since 1970.



We are convinced that the previous technical rejection of the ICOMOS Commission declaring "it does not clarify how the property could be seen as exceptional or outstanding" and also the fact that [not] "...any of the proposed criteria have been justified and that the Outstanding Universal Value of the nominated property has been demonstrated." cannot be reversed in 12 months or ever.

Following up on the ICOMOS observations, the regional government has substantially reduced the core area (which is the statutory protected property according to UNESCO rules) in the new proposal due to various environmental problems and widespread urbanization in many municipalities. The 15 initial municipalities in the core area have been reduced to 11, 4 municipalities in the "buffer zone" plus another 14 municipalities around in a "commitment zone". Regarding this drastic downsizing some local administrations are not happy for the constraints that the World Heritage status can bring.

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.

¹ «ICOMOS concludes that there is insufficient basis for the inclusion of the Colline del Prosecco di Conegliano e Valdobbiadene in the World Heritage List.» ICOMOS 2018 Evaluations of Nominations of Cultural and Mixed Properties-ICOMOS report for the World Heritage Committee, <https://whc.unesco.org/archive/2018/whc18-42com-inf8B1-en.pdf> p. 241

² *ibid.*, chapter "History and Development - Evaluation of cultural and mixed properties" p. 232

The new Wine Protocol 2018 of the DOCG Prosecco “Conegliano-Valdobbiadene” follows that of the year 2017 and does not change practically anything either in terms of quantity of pesticides allowed or in terms of danger, as can be deduced from the detailed comparative ecological analysis of the two protocols (2017-2018) made by the organisations “PAN Italia” and “European Consumers”. The analysis states: “The 2018 document of Prosecco DOCG does not differ from that of 2017 and also contains a list of products including substances in the process of substitution / elimination due to their toxicity”. For instance in the vineyard protocol of 2018 the use of Chlorpyrifos – a systemic, highly toxic insecticide which even in small doses can impact children’s brain development and hormonal systems – is still authorized and widely used in our region. The severity of the environmental situation in the hills of DOCG Prosecco is also revealed by recent local newspaper articles.³

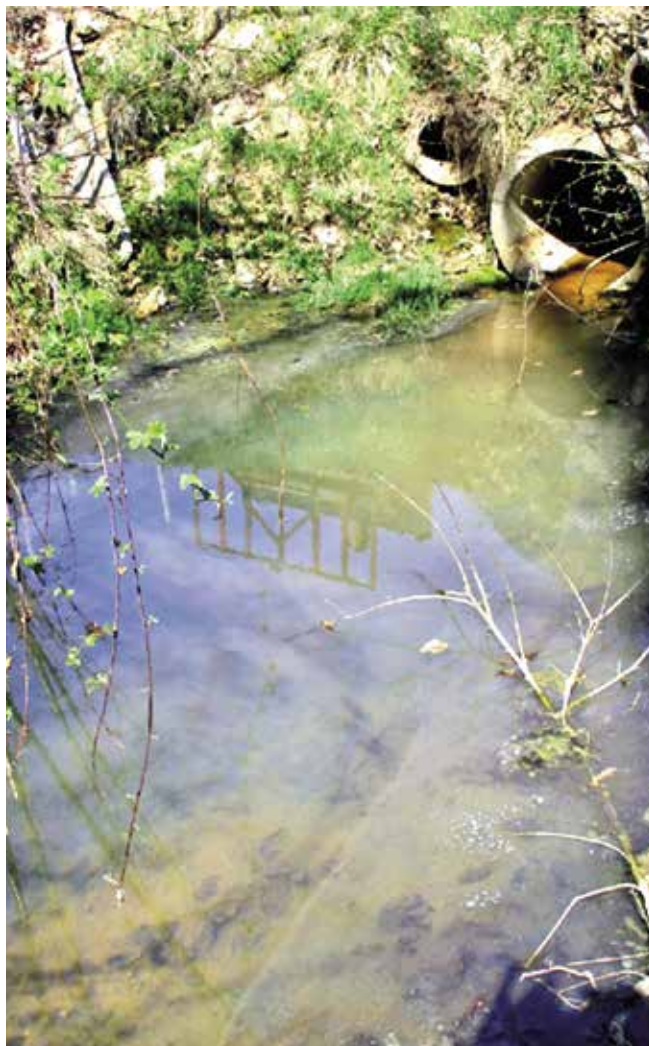


Fig. 2: Situation of the watercourse caused by the spillage of waste materials which are generated along the supply chain of grapes. Source: ricerca.gelocal.it

As a response to these above-mentioned problems, local citizen groups have been taking up a series of important initiatives against the use of toxic pesticides⁴, and have also been urging UNESCO not to certify the monoculture of the (11 + 4 + 14) core / buffer / commitment municipalities of the Prosecco DOCG in Treviso (Italy) as a world heritage until they stop the use of toxic pesticides.

Unfortunately UNESCO has not yet developed procedures for the management and control of the use of synthetic pesticides despite having declared them a “threat” as early as 1972 but also in three other official UNESCO documents.⁵

The nomination of Prosecco has also revealed the urgency that the UNESCO World Heritage Committee should adopt a policy document that the World Heritage status is incompatible with



Fig. 3: There are numerous reports of citizens: dirty water, dead fish and anomalous smells caused by the toxic spills.

Source: <https://tribunatreviso.gelocal.it/treviso/cronaca/2018/10/23/news/veleni-sul-cervano-una-strage-di-pesci-vicino-a-ponte-maset-1.17385489>

the use of toxic pesticides, and that World Heritage properties and their buffer zones must be free from their use or at least provide a scheme for a progressive ban whose implementation is monitored by UNESCO.

The nomination of the region of Prosecco DOCG in Treviso (Italy) to become a UNESCO World Heritage in 2017 has been strongly contested by the local communities. Citizens first gathered under a march against pesticides organized in May 2017, with more than 3,000 citizens and representatives of more than 120 local, regional and national associations. Local groups have organised numerous meetings and written countless letters to stop the use of synthetic pesticides and ensure the well-being and health of its inhabitants.

In May 2018, thousands of people participated in a march organised not only in the Prosecco region but also in other re-

³ <https://tribunatreviso.gelocal.it/treviso/cronaca/2018/09/25/news/il-monticano-come-una-fogna-a-conegliano-cantine-ancora-sotto-accusa-1.17285710>
https://www.ilgazzettino.it/nordest/treviso/inquinamento_torrente_teva-3996599.html
<http://ricerca.gelocal.it/tribunatreviso/archivio/tribunatreviso/2018/10/03/treviso-sversamento-in-canale-via-cavre-inquinata-vinicole-nel-mirino-31.html>

⁴ https://www.ilgazzettino.it/pay/treviso_pay/acqua_grigia_e_moria_di_pesci_la_vendemmia_sotto_accusa-4057613.html

⁵ 1 - Resource Manual - Managing Natural World Heritage - 2017: <http://whc.unesco.org/en/managing-natural-world-heritage/>; 2 - Operational Guidelines for the Implementation of the World Heritage Convention (2016): <http://whc.unesco.org/en/guidelines/>; 3 - World Heritage in Danger - 2017: <http://whc.unesco.org/en/158/>

gions of intensive wine production. These marches have been followed by regular protest sit-ins in front of municipal administration buildings across the region. In order to strengthen the proposals for transition to healthy agricultural processes, it was decided to hold the third annual “Stop Pesticide Cison-Follina” march on May 2019 (most likely the number of the three regional marches will be increased to four next year).



Fig. 4: Collecting signatures for the referendum on a stand in Conegliano, 2 September 2018.

Photo: PAN Italia



Fig. 5: A bicycle rallye for the referendum.

Photo: PAN Italia



Fig. 6: In Conegliano after delivery of the referendum signatures to the mayor, 25-10-2018.

Photo: PAN Italia

As a milestone in this struggle against toxic pesticides, on 25 October 2018, a successful petition was submitted to the local administration in the town of Conegliano demanding a referendum to ban all synthetic pesticides from the municipal area.⁶ This municipal referendum aims to include in the municipal policy a regulation that the biological process of agricultural production should gradually be converted to organic farming in the whole territory.

Will UNESCO hear the outcry of citizens against the use of toxic pesticides? Now it is in the hands of the UNESCO World Heritage Committee and its 43rd Annual Session to set an example by NOT inscribing the monoculture of the (11 + 4 + 14) core/buffer/commitment municipalities of the Prosecco DOCG in Treviso (Italy) as a world heritage until they stop the use of synthetic pesticides.

⁶ See video CONEGLIANO – THE REFERENDUM FOR A FUTURE <https://youtu.be/aB69lji-nNw>

Lake Ohrid, Northern Macedonia – Where Concrete Rises and Waters Fall

Daniel Scarry and Emilija Apostolova Chalovska, Ohrid SOS



Tucked between the Mokra and Galichica mountains along the border of the Republics of Northern Macedonia and Albania is the Ohrid region, where tectonic movements gave birth nearly 2,000,000 years ago¹ to an exceptionally deep, clear and oxygen-rich lake, whose isolated freshwaters have since become the most speciose of any in the world when measured by uniqueness and surface area, with 212 endemics among 1,200 native taxa².



Fig. 1: Lake Ohrid.

Map: Google Earth / adapted by Andrea Martinez

Named Lake Ohrid, this ancient inland water has softened dryness and temperature extremes in the local terrestrial region for hundreds of millennia, harbouring trees during glacial advances³ and sheltering specific wetland habitats when Balkan valleys desiccated in the post-glacial era⁴. The result today is floral and faunal diversity of continental significance.

Within this ark-like ecological arena, human settlements first appeared on the lakeshore 7,000 years ago, and their con-

tinuous history since is weaved into the landscape through 244 archaeological sites⁵ with their epicentre in the city of Ohrid. Hence, the Macedonian side of the lake was ordained a UNESCO World Heritage Site under natural criterion (vii) in 1979, which coupled with cultural criteria (i), (iii) and (iv) in 1980 to create a rare mixed property of 83,350 ha: Natural and Cultural Heritage of the Ohrid Region.



Fig. 2: Ohrid: A view from the citadel to the eastern coast of the lake, with the Studenchishta Marsh on the left.
Photo: Stephan Doempke 2011

Approaching four decades since UNESCO recognition, however, a century of population growth; the explosion of the tourism industry; agricultural intensification; wetland loss; and their associated pressures may have pushed Lake Ohrid to the brink of a biodiversity crisis⁶, compounded by a deficit in decision-maker consciousness⁷ and a development approach that conflicts with the essence of World Heritage protection⁸.

Responding to proposals for several mega-projects that augured even greater deterioration of the site's values, the World Heritage Centre, ICOMOS and IUCN embarked on a Reactive Monitoring Mission (RMM) to the Ohrid region in April 2017. The mission tabled 19 recommendations⁹ to the Republic of Northern Macedonia aimed at arresting the property's decline, which were officially accepted in their entirety by Decision 41 COM 7B.34 of the World Heritage Committee's (WHC) 41st Session in Krakow, Poland 2017. Now the WHC's credibility as an instrument for encouraging protection of natural and cultural heritage¹⁰ in a Northern Macedonian context rests upon its ability both to secure implementation of these recommendations and rectify their oversights, particularly on wetland protection.

Urbanization / Tourism Expansion

The Northern Macedonian government's early 2018 acceptance of RMM Recommendations 4 and 5 to abandon plans for a ski-resort and express road in the World Heritage Site¹¹ initially indicated progress on exploitation of the Ohrid region for tourism and urban development. This was misleading: RMM Recommendation 6 for a moratorium, pending functional control mechanisms, on all coastal and urban transformation in the World Heritage property should have been simultaneously enacted. Instead, it has been totally ignored.



Fig. 3: Coastal destruction near Struga, April 2018.

Photo: Tampon V'ale

Bafflingly, the WHC remained silent upon the issue during its 42nd Session in Bahrain 2018, a torpor that manifests in the face of ongoing construction of a large shoreline hotel complex at Sveti Stefan; expansion of restaurant facilities at the Springs of Saint Naum, a Zone of Strict Protection; voracious destruction of coastal habitats at Struga on Lake Ohrid's northwest shore; yet more construction in the city of Ohrid; incremental assembly of an illegal hotel in the village of Lagadin¹²; and the announcement of a large resort at Gorica, at another shoreline location; alongside widespread tree loss and landscape change. These actions aim to maximize visitor numbers, foregoing advice from RMM Recommendation 5 to reconfigure regional policy towards ecotourism.



Fig. 4 and 5: Dead fish covering the Studenchishta Canal, November 2018.

Photos: ohridnews.com

Estimating the damage to Ohrid heritage from this carnage is impossible, however, because RMM Recommendation 8 for a rigorous strategic environmental assessment (SEA) on the cumulative impacts of all infrastructure and development projects has also failed to materialize. In its absence, SEAs for individual projects omit basic details such as the specific size and capacity of proposed buildings; figures to legitimize bold economic claims; or lists of species that may be impacted. Existing degradation of natural habitats is routinely used as justification for further construction, ecosystem services do not feature, and two recent SEAs even claim that non-implementation of projects is a danger to Lake Ohrid's flora and fauna¹³. Meanwhile, public consultations regularly taper into nothingness when officially submitted comments to SEAs receive no response and key documents are withheld¹⁴.

Sewerage

A critical implication of mass tourism and the construction boom in the Ohrid region is the excessive nutrient loads that flow into the lake from hotels and residential sewerage. This is particularly detrimental in context as Lake Ohrid's world-unique species have adapted to its very specific low-nutrient conditions. Scandalously, after upgrades during the late 80s and early 2000s, the Ohrid region's sewerage network has been allowed to fall into disrepair with untreated wastewater washing directly into the lake up to 100 days per year¹⁵. Moreover, despite RMM Recommendation 13 for improvements to waste water treatment, senior management at Proaqua, the company responsible, was publicly quoted on 5 June 2018 – almost exactly one year later – stating that the system was on the verge of collapse¹⁶. As new hotels and resort projects aimed at higher numbers of visitors push forward, no concrete steps have been taken to rehabilitate wastewater treatment. Tellingly, the SEA for the aforementioned Gorica resort discontinues its history of Ohrid region sewerage at 2005¹⁷.

Hydropower

A source of hydroelectricity via its single outflow, the River Black Drim, Lake Ohrid has suffered related ecological conse-



quences due to habitat fragmentation and artificial diversion of the pollutive River Sateska since the 1960s¹⁸. Environmentally insensitive hydrological management by power company ELEM has since compounded the issue by periodically releasing large quantities of water from the lake, risking damage to shallow waters¹⁹ vital to the ecosystem. RMM Recommendation 15 attempted to rectify the situation by requesting stabilization of lake levels and control of ELEM's water discharges. Nonetheless, in November 2018, exploitation of water resources caused levels to drop at Lake Ohrid's Studenchishta Canal, where large populations of fish shelter from the winter. The result was an associated fall in oxygen levels, leading to approximately 500-600 kg of fish kill²⁰.

National Hydrometeorological Service (UHMR) figures from 19-23 November 2018 reveal that, at a minimum of 693.24 metres above sea level²¹, the lake surface was within legal parameters during the fish kill, suggesting either legislative or logistical inadequacy for heritage conservation. No appropriate pumping or aeration equipment was on hand to alleviate the disaster. Neither was there any kind of timely response from relevant authorities. Dubiously, the incident also highlighted that statistics published by ELEM showed higher water levels than those released by UHMR²². It is unclear why.

More positively, provision within RMM Recommendation 15 for exploring possibilities to restore the Sateska River, source to Lake Ohrid of up to 129 tonnes of suspended matter daily²³, to the pathway from which it was artificially rerouted in 1962 edged to realization with the announcement of a UNDP project²⁴. Whether this will result in on-the-ground action remains to be seen: Ecological projects are often aborted at the PDF stage in Northern Macedonia²⁵.



Fig. 6: Illegal construction dump, Gorica September 2018.

Photo: Sonja Dimoska

Wetland Protection / Restoration

Underlining the propensity for inaction, Studenchishte Marsh, the final remains of previously extensive shoreline wetlands that contribute significant biodiversity to the Ohrid Region World Heritage Site, continues to lack status as a protected area at the national level, and, together with Lake Ohrid, as a Wetland of International Importance under the Ramsar Convention.

This is despite 40 years of bumbling through vague protection categories²⁶; a 2012 expert study recommending its designation as a 63.97 ha Monument of Nature²⁷; a National Strategy for Biological Diversity with Action Plan that envisaged Ramsar nomination for Lake Ohrid by 2017²⁸; and the adoption by the Northern Macedonian government of a proposal to establish protected status for the area²⁹. In the interim, Studenchishte has suffered habitat loss; become a dump for construction waste; seen relict species disintegrate into local extinction; and was almost drained to make way for a water sports centre and luxury accommodation³⁰. Plans for a large marina at the location continue to resurface intermittently³¹.

Pressure to overcome the protection impasse rose in May 2018, when, at the 13th Society of Wetland Scientists' Europe Chapter Meeting, 45 experts from across the world unanimously passed *The Declaration on the Protection of the Lake Ohrid Ecosystem* (see annex), which called for substantial enhancement of Studenchishte Marsh's protection in recognition of both its ecosystem services and species richness, while explicitly drawing attention to the underperformance of World Heritage status in terms of regional wetland conservation³². Attending the conference, Mayor Stojanoski of Ohrid Municipality reiterated his party's goal to protect Studenchishte by the end of 2018³³. That no further progress has been made is symptomatic of prevailing attitudes to conservation in Northern Macedonia, and reflective of the World Heritage Committee's inexplicable lethargy regarding coastal wetlands in the Ohrid region.

Recommendations

- Given the impending risk of a biodiversity crisis, continued mismanagement, and failure to implement key RMM recommendations, the World Heritage Committee must place the Ohrid region on the List of World Heritage in Danger until full compliance with RMM requests - most notably the moratorium on construction - is demonstrated.
- Immediate restorative action is required for the wastewater treatment system in the Ohrid region as an absolute developmental priority, including concrete monitoring and punitive measures to sustain maintenance over an indefinite future period.
- Based on existing data, high-level national protection must be granted to a minimum of 63.97 ha of shoreline wetland at Studenchishte Marsh without delay, to be incorporated within a Lake Ohrid Ramsar Site nominated over the same timeframe of immediacy.
- Requirements for SEAs must be upgraded to incorporate a meaningful mitigation hierarchy, data-based evidence for conclusions and ecosystem service calculations.
- Pumping and aeration equipment must be located at Studenchishta Canal to prevent mass fish kills during emergency situations. Powerful sanctions are needed to deter mismanagement of water resources.

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Annex

The Declaration on the Protection of the Lake Ohrid Ecosystem

Final Resolution adopted at the 13th Society of Wetland Scientists Europe Chapter Meeting Ohrid, Republic of Macedonia, 1–3 May 2018



The 45 SWS Europe wetland conference participants in Ohrid, Macedonia, from over 18 countries and representing a wide range of expertise in wetland

science, green technology, policy and management, acknowledge the timely moment in which we have gathered here; and, have come to agreement on the following issues:

Recognizing the unique magnificence of the region with the two connected lakes (Ohrid and Prespa), in terms of overall biodiversity, number of endemic species of many plant, animal and microbial groups, excellent water quality and relatively undisturbed mountainous landscapes in the transition between Central Europe, the Mediterranean and the Balkan peninsula;

Recognizing the unrivalled length of time of undisturbed development of Lakes Ohrid and Prespa, spanning at least 1.6 million years, which (1) has led to layered sediments with unique thickness enabling studies of climate and evolution in these systems for their entire lifetime, which is unique in the world and (2) has led to a large number of endemic species of plants, animals and microbes in these systems;

Recognizing the excellent current condition of Lake Ohrid with its low nutrient water quality and inflow of very healthy water from the surrounding mountains, which is, however, threatened by polluted inflows from increasing human populations of local residents and tourists and from agricultural use of former floodplains in the catchment of the Lake, which dates back only a few decades since these floodplains were drained and the course of the river Drim and other water courses were strongly modified, bringing polluted water into the Lake.

Recognizing the deteriorating status of the very last intact marsh on the shores of Lake Ohrid, Studenchishte Marsh. The wetland area remaining is only a minor part of the much larger wetland system which used to be here 50 years ago but which has suffered from (1) building development, (2) encroaching drainage and agricultural use, (3) dumping of building materials and other wastes; (4) creation of a plant nursery, (5) recent road construction along the Lake shore, compromising the ecological integrity between the Marsh and the Lake, which are vital for the long-term sustainability of the system;

Recognizing the critical importance and high value of the remaining part of Studenchishte Marsh in terms of inter alia (1) species diversity of plants and animals, with some communities (e.g. *Caricetum elatae*) being very rare in the region at large; (2) the presence of undisturbed peat layers with a thickness of several meters, which have developed over at least 4000 years and are particularly rare in Macedonia and (3) the very last fully functioning marsh ecosystem along the lake with a unique species composition and set of wetland ecosystem services such as water quality improvement, carbon storage, flood retention and some other functions (spawning of fish species from the Lake) that could be revitalized by reversing some of the recent modifications;

Recognizing that Lake Ohrid does have a protection status following its inscription as a UNESCO World Heritage program, however, this has not been sufficient to halt the fluxes of polluted water into the Lake and does not provide any explicit protection of the valuable Studenchishte Marsh;

Recognizing that the Lake Ohrid system, including Studenchishte Marsh, is of key importance as the core resource on which economic development through sustainable tourism can be achieved, so that the protection and revitalization of this ecosystem must be the number one priority for regional development.

Therefore, call upon the Macedonian authorities from the national to the local level to substantially enhance the status of protection of Lake Ohrid, including Studenchishte Marsh and its catchment through existing legislation and instruments. This should also be achieved by designating the Lake system as a Wetland of International Importance under the Ramsar Convention. Macedonia is a Contracting Party of the Ramsar Convention and SWS has information that the designation would be welcomed by the Ramsar Secretariat in Gland, Switzerland, and that this designation can be based on the information that is currently available;

Therefore, in addition, call upon the urgent development and implementation of an action plan to protect Studenchishte Marsh and to revitalize it as much as possible. This should include inter alia: the local replacement of the current hard boundary with the Lake with a wooden walkway allowing direct water flows and ecological exchange between the Marsh and Lake; the cessation of dumping; and the encroachment of agricultural activities. The enlargement of the surface area of the marsh towards its original extent should be the long-term goal. Removal of solid wastes and rewetting of agricultural areas should be carried out with great care. Current land users should be compensated in the best possible way;

Therefore, call upon a substantial revision of the water management practices in the cities and rural villages around the Lake to prevent discharges of polluted water into the Lake; this should be part of a long-term plan including the use of wetland restoration and constructed wetlands to improve water quality and funding opportunities should be investigated from appropriate organizations, e.g. the EU and the World Bank;

Therefore, call upon the city government of Ohrid to develop multiple nature tourism attractions in the area to increase revenues by offering more diverse options and extending the tourist season; this could be achieved by developing locations such as Studenchishte Marsh as a nature park with facilities such as a visitor and environmental education center, a nature trail with boardwalks and wildlife watching buildings. Culturally important sites such as Biljanini Springs and the archeological monuments around it could also become part of this attraction and would give visitors an interesting experience where they can learn about the unique nature, culture and history of the region.

We thank the Governments of Macedonia and Ohrid, the St. Clement of Bitola University in Ohrid, the St. Cyril and Methodius University in Skopje, and Ohrid SOS for hosting and contributing to the 13th SWS Europe meeting.

Signed on behalf of all participants in Ohrid, Macedonia on 3 May 2018 by Matthew Simpson, Keith Edwards, Matthew Cochran and Jos T. A. Verhoeven

Management in Question at The Cultural Landscape of Bali Province

Wiwik Dharmiasih, Universitas Udayana

Background of the Site and Rationale for Inscription

The Cultural Landscape of Bali Province was inscribed six years ago in Saint Petersburg, Russia. As a cultural landscape, it represents a living heritage of the *Tri Hita Karana* philosophy, the three foundations for prosperity. This traditional philosophy governs Balinese relations among one another (*pawongan*), structure people's relationship with the environment (*palema-han*), and guides spiritual practice (*parhyangan*) (MoCT and GoBP, 2011). The subak is the embodiment of this philosophy, a governing system of traditional water management visible in the rice farming practices that define much of Bali's rural landscapes. The subak produces a complex network of picturesque rice terraces, which have always been associated with Bali as a tourism destination. The subak however, has become increasingly vulnerable to different development trends and led to the World Heritage Committee to echo these concerns in the decision following the inscription (UNESCO, 2012).

There are various reasons the subak is experiencing pressures to its overall integrity. Economic growth across Bali has resulted in dramatic land use changes. Rice terraces are being converted for expanding settlement areas, especially in support of tourism infrastructure that has led to the expansion of hotels, villas, restaurants, and other destination facilities. The increasing land values from tourism also translates into higher taxes that have affected the viability of making a living from rice farming.



Fig. 1: A Gong Restaurant.

Photo: Wiwik Dharmiasih

Furthermore, increased tourism also results in the reallocation of water uses away from the subak. Those tourism facilities require large amounts of water and have thus reordered the prioritization of who gets access. Not only are the land and water concerns reshaping rice farming, farmers are also turning away from their rice fields for various reasons. Those with the traditional knowledge to manage the subak are now aging, without a younger generation to replace them. Due to the low wages from rice farming, younger generations are encouraged by their parents to seek other employment opportunities, and youth increasingly prefer to find work in urban areas or as part of the tourism industry.

Management Interventions

Since inscription in 2012 however, the subak rice terraces have experienced heightened pressures from an increasing number of visitors eager to visit the subak and experience the World Heritage Site. The government established a coordination forum for the management of the Cultural Landscape of Bali Province to systematically address the aforementioned challenges and involve the numerous stakeholders through an adaptive management approach. The establishment of the coordination forum intended to increase participation among local community institutions such as farmers, villagers, and local temples ensuring that they can continue to maintain their cultural practices and benefit from the inscription.

The lead government agencies published a management plan as guidelines for implementing programs at the site. Listed in the management plan are key priorities such as protection and improvement of livelihoods, preservation and promotion of ecosystem services, conservation of tangible cultural heritage, sustainable tourism that results in mutual benefit, and improved infrastructure facilities.

In the largest cluster of the Subak Landscape at Catur Angga Batukaru, a *Forum Pekaseh* was established to bring together 20 heads of subak to coordinate amongst each other on the management of subak as an integrated World Heritage Site. This showed that the broader governing forum included local representation in management rights and responsibilities. Through this forum, detailed participatory mapping initia-

tives were conducted to map water sources and flows to ensure that water quality and forest cover were properly managed to ensure protection of the overall catchment area. The *Forum Pekaseh* were also invited to participate in drafting the Sustainable Tourism Strategy (STS). The STS is a joint commitment to create a holistic tourism management guideline that serves local communities while enhancing the integrity of the site. Alongside reshaping tourism engagement for local benefit, other farming interventions sought to support local livelihoods. District government policies provided graduated land tax relief programs for farmers that differed across the cluster areas.

In 2017, during the 41st World Heritage Committee session, the Government of Indonesia (GOI) was requested to submit an updated report on the state of conservation of the property. They are requested to detail the steps taken for designating the site as a National Strategic Area and finalizing a proposed Presidential Decree that are anticipated to further strengthen the management and action plan to address aforementioned vulnerabilities. Although GOI is expected to submit their report on the State of Conservation on December 1st, 2018, local management practices highlight some significant shortcomings in fulfilling the original mandate of site designation. For example, Subak Jatiluwih received attention during the 2015 Advisory Mission for the rapid land use changes from tourism development taking place there (ICOMOS/ICCROM, 2015).

Continuing Challenges to Management Implementation

The development that is currently taking place in Subak Jatiluwih is threatening the broader integrity and coherence of the site. Large scale tourism facilities are being constructed amidst the rice terraces, even within the core zone of the cultural landscape. In 2015, a parking lot was proposed in response to the traffic congestion in the area as a result of the growing number of visitors to Jatiluwih. This proposal was protested by head of the subak (*pekaseh*) for its conversion of productive rice fields. The development proceeded however, receiving support from the district government justified for the benefits of the local community. Although parking lots were constructed as part of the project, the intent had been to develop a large restaurant permissible on grounds that they were providing a free parking service.

This example highlights the complexity of managing a site with numerous privately-owned land parcels, as the precedence from restaurant construction was soon followed by others eager to benefit from the growing number of visitors to the site. Throughout the subak areas, farmers have also begun converting their productive rice fields by building small stalls along trekking areas that allow visitors to traverse paths through the subak area. The tourism industry has also led to income inequality over the administration of ticketing into the site.

Daerah Tujuan Wisata (DTW) Jatiluwih, a governing body created to manage tourism and attractions, administers ticketing to the site. The subak receives very little percentage. Indeed, the community is increasingly split between two distinct camps, ones that support benefitting from the sharp rise in tourism attention, and others that aim to protect the subak in its natural form.



Fig. 2: Farmer's small stall.

Photo: Wiwik Dharmiasih

The establishment of the Forum Pekaseh as local guardians of the site is acknowledged by the district government. However, this acknowledgement has not translated into meaningful involvement in governing the site. Instead, DTW Jatiluwih was assigned by the district government to manage Subak Jatiluwih. Unfortunately, this governing body only focuses on Jatiluwih and overlooks the broader connectivity of the landscape, especially the remaining 19 subaks that are part of the Subak Landscape of Catur Angga Batukaru. DTW Jatiluwih currently only focuses on the development of tourism attraction in the site, and other subaks feel they have been ignored in decision making processes.

DTW Jatiluwih also constructed a subak road justified for agricultural connectivity, which is now a popular trekking route for visitors to walk through the rice fields, and which has subsequently provided access to different venues for festivals and other attractions. These establishments are clearly not intended to support the agricultural functions of the subak. New developments have become increasingly egregious, including an open theatre and a planned helipad for VVIP guests. Far from being based on the *awig-awig* (local traditional law governing the subak), local farmers feel that their authority to sustain their farming systems is increasingly being undermined.

As these changes affect the legitimacy of local *awig-awig*, at the more regional governing level there is still uncertainty on the new District Spatial Plan, which is still under revision. Therefore, the current laws that are designed to designate and enforce the location of green belts and conservation areas, especially the World Heritage Site, are still not yet finalized and formalized by the district government.



Fig. 3: Jatiluwih Festival Map.

Source: <http://jatiluwihfestival.com/lokasi>

Furthermore, existing designations of green belt areas are routinely ignored for development purposes hoping that the revision of the spatial plan will re-designate their zoning. In sum, the proposed intervention of a National Strategic Area with a Presidential Decree is likely to have very little effect on the dy-

namics described in this report. Without addressing the land use conflicts, providing more meaningful forums for local guardians to express their management interests in the site, policy interventions will likely have limited affect in overcoming the stated vulnerabilities that led to site designation in the first place.



Fig. 4: Open theatre in Jatiluwih

Photo source: <https://www.instagram.com/p/BIKqMXzDM1q>

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IV. Historic Cities and Urban Ensembles

The Monastery of El Carmen Bajo Affected by the Construction of the Quito Underground Metro

Gloria Galarza Peñaherrera, Colectivo Kitu Milenario

We inform of the damage caused to the Monastery of Carmen Bajo, and the current state of the Historical Center of Quito, a World Heritage, by the passage of the work of the underground subway that threatens the possibility of putting it into operation, from the moment of the realization of the first tests scheduled for the end of 2019.

Historical background

By Episcopal Decree on August 26, 1669, the Prelate Don Alonso de la Peña y Montenegro created the Foundation of the Discalced Carmelite Monastery in Latacunga (a city located an hour and a half from the city of Quito).

The earthquake that struck Latacunga in 1698 destroyed much of that city including the Monastery. The Bishop of Quito ordered the Discalced Carmelite nuns to move to the capital, the same ones who stayed charitably at “El Carmen de San José” Monastery. After a while they moved to live in a rented place in the neighborhood of Santa Bárbara.

The new Foundation of Modern Carmen, in the site that it has occupied until now, was authorized by the Chapter of the Cathedral in Sede Vacante, on several lots purchased by the Diocesan Archbishop for 2,800 pesos, on April 29, 1702. The construction of the Monastery continued in the following years. In the year 1706, a cloister and a chapel were completed and with the blessing of the new Bishop Dr. Don Diego Ladrón de Guevara, the nuns were able to move.

The construction of the main section of the convent cloister and the work of the Church began during the episcopal government of the Most Illustrious Mr. Luis Francisco Romero (1718-1726) in the land purchased from Don Alfonso Maldonado. “In 1723 he used the amount of two thousand pesos of the chaplaincy of the cleric Don Simon Mendez. To this sum he added one thousand pesos of the dowry of Sister Isabel de Santa María and bought for the monastery the house of the sec-



Fig. 1: Historic center Quito in a map of 1914, published by order of the General Intendent of Quito

Source: Historical archive, Secretary of Territory, adapted by A. Martínez/WHW

retary Don Alonso Maldonado, in whose place the construction of the current church and the main cloister began¹. The Church was inaugurated in the year 1745. On June 6, 1747, the tabernacle and the pulpit were inaugurated, thus concluding this beautiful architectural complex.

The Carmen Bajo monastery is located in the Historical Center of Quito, a World Heritage Site since 1978. Its construction is harmonious, despite the constructive adjustments to take advantage of plots that were acquired in time with the slopes of the city, merged artistically between arches and vaults in canga-gua, stone and brick (Fig. 1–4).

In the year 2018, the sisters of Carmen Bajo discovered some catacombs in the basement of the Monastery – a series of underground galleries that starts on Manabí street and continues to Olmedo street, with a route that would reach 250 meters. They began to adapt them with a plan to exhibit them to tourists in the middle of the month of September of that year. This project was truncated by the passage of the “tunneling machine” under the Monastery in August of the same year, which

¹ Vargas, O.P., Fray José María (2005) Patrimonio artístico ecuatoriano. Ed.Trama. Quito. p.254.



Fig. 2: View of the church, Convent of Carmen Bajo.
Photo: Gloria Galarza



Fig. 3: Catacombs of Carmen Bajo. Photo: Gloria Galarza



Fig. 5: Fissure in the wall of the manger of Carmen Bajo.
Photo: Gloria Galarza



Fig. 4: Manger in the church of Carmen Bajo. Photo: www.experimenta.quito.com.ec



Fig. 6: Photo of the plan delivered by metroQ to the Carmen convent indicating the route of the underground metro. The subway will pass between the yellow lines.



Fig. 7: Part of the catacombs damaged by the passage of tunnel boring machine.
Photo: Gloria Galarza



Fig. 8: Part of the catacombs damaged by the passage of tunnel boring machine.
Photo: Gloria Galarza



Fig. 9: Part of the catacombs damaged by the passage of tunnel boring machine.
Photo: D Velasco



Fig. 10: Part of the catacombs damaged by the passage of tunnel boring machine.
Photo: Gloria Galarza



Fig. 11: Pipe damage in the patio of the orange trees, Convent of Carmen Bajo.
Photo: Gloria Galarza



Fig. 12: Pipe damage in the Convent garden.
Photo: Gloria Galarza



Fig. 13: Side view of damage in the Convent Garden.
Photo: Gloria Galarza



Fig. 14: Damage to Convent rooms, with marks for repair work. This exists in many interior walls.
Photo: Gloria Galarza



Fig. 15: Damage done to the roof by MetroQ workers while putting in place a sensor.
Photo: Gloria Galarza

damaged 150 meters of these galleries². The damage to the pipes in the convent was systematic and progressive, was noticed by the sisters in September. While the pipes have been repaired, the fissures in walls and structural damage continue (Fig. 5 and 6).

The damages caused to the convent complex are visible to the naked eye: vertical fissures in walls and other structures run from “barrel vaults” built in brick; damage to the ancient pipes of the internal sewage system, some presumably pre-Columbian, that did not withstand the vibration of the “tunneling machine” and that turned the catacombs of the monastery into a real sewage pool (Fig. 7–15). The damage was reported on television and reported to the Municipal Heritage Institute of Quito (IMP).

The response of the director of the IMP, Angélica Arias, was: *“The damages are outside the passage of the Metro line and have to do with humidity that existed for years and that the Order has not repaired.”*³ In addition, the IMP clarifies that “the pipes of the convent are 3 and 4 meters deep” and that “the tunneling machine was about 10 or 15 meters deep”, so it had no impact on what the IMP calls “immediate subsoil”, report clearly based to defend the several times denounced “corrupt work of the Quito metro” executed by Acciona & Odebrecht companies, in the face of tangible PATRIMONIAL damage and the sight of all citizens. However, the Metropolitan Institute of Heritage (IMP) began some repair work in September 2018, as part of an “agreement with the curia, for several monasteries of the city.”⁴

On October 7, 2018, a group for the defense of the Historical Center, the Kitu Milenario Collective and the Citizen Oversight, entered to verify and document the damages reported by Mother Esperanza, prioress of the Convent. Verifying everything reported and uploading to social networks to pressure the authorities to carry out the corresponding repair work. To our surprise, that same day a false news was published, where it was argued that the sisters of the convent were recanting their accusation of the damages caused by the works of the Quito metro.⁵

On March 6, 2019, we performed a new inspection of the works carried out by the IMP in the Convent, since the IMP would have completed the repairs “due to lack of budget”, apparently having finished the pipe work and having made up the masonry walls, but without clarifying the conditions in which the structural effects of the building remain.

We should note that adjoining the Convent of Carmen Bajo in its northwestern corner between Manabí and present-day Venezuela streets, the gully called “*de San Juan o de la Chilena*” (Fig. 16) has been filled centuries ago. On the composition and stability of this filling must answer the Municipal Institute of Heritage (IMP). The improvised raid with a “tunneling machine” through the Historic Center of Quito, without the respective studies, is a clear example of what happened in Carmen Bajo and a warning for what could happen in the future.



Fig. 16: Photo of a model of Colonial Quito located in the Municipal Library, showing the gullys filled where the town was built.
Photo: Gloria Galarz

The patrimonial buildings are in danger, due to their bad state of conservation they can collapse (Fig. 17–19), a situation that has already occurred in the Tola neighborhood where the Alameda station was built, and in the back part of the Santa Clara Viaduct, in Benalcázar and Imbabura streets where the viaduct near the San Francisco metro station was built, in areas demarcated as patrimonial and of pre-Columbian origin.

It should be noted that the heritage house that will serve as an entrance to the San Francisco station, located between Sucre and Benalcázar streets, is a clear example of the destruction of wide structural walls and internal division walls, leaving only a false façade useful, in contravention of any international conservation norms of the heritage. This heritage house is adapted as well as technical imposture to the interests of a metro station, authorized by the Municipal Institute of Heritage, a facade made for “clueless tourists”, while its real historical, cultural and technical constructive values have been lost (Fig. 20–22).

The current status of all the affected sites in the Historic Center, where the construction of the Quito metro is involved, is shown in the attached photos. Plaza de Santa Clara has been used for years by Metro Quito, without the processes being environmentally sustainable and patrimonially suitable. The sisters of the patrimonial convent of Santa Clara have been thus harmed with the decrease of their income by lease for the gentrification of the area, income by which they maintained the colonial convent attached to the monumental set of San Francisco, dating from the year 1596⁶. The church has stopped being

2 <https://www.facebook.com/DavidPazV/videos/10157869371023452/UzpfSTE0MjUwODMyMTM6Vks6MTc0NjYyNzYyMjExNjY0MA/>

3 <https://www.elcomercio.com/actualidad/instituto-patrimonio-repara-duc-tos-carmen.html>

4 <http://www.teleamazonas.com/2018/10/danos-en-convento-no-serian-provocado-por-tuneladora/>

5 <https://www.facebook.com/DdeSFQ/videos/462550054579579/>

6 <https://www.youtube.com/watch?v=1ihEUKQ6Epc>

visited by the parishioners, who fear the crime that has been waged on their surroundings, making the place a dangerous area (Fig. 23). Another architectural treasure of the city put at risk by inadmissible works. To this date, similar works are being carried out in the Plaza del Teatro, another heritage square with neoclassical monuments (Fig. 24–26).

As citizens of Quito we do not lose hope that protective measures are taken to prevent the loss, deterioration and irreversible damage to this invaluable heritage. The groups of defense of the Historical Center, especially the “Colectivo Kitu Milenario”, will remain observant and will systematically document the actions and inactions of the control organisms such as UNESCO, ICOMOS, INPC and IMP, called to protect their integrity.

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<https://www.facebook.com/DdeSFQ/>



Fig. 17: Condition of the Patrimonial house used for admission to the San Francisco metro station.

Photo: Gloria Galarza



Fig. 18: House in Calle Ambato, 2014. Photo: F. Sandoval



Fig. 19: House in San Blas, 2016. Photo: El Comercio



Fig. 20: Calle Loja, 2017.

Photo: Courtesy COE Metropolitano



Fig. 21: Condition of the Patrimonial house used for admission to the San Francisco metro station.

Photo: Gloria Galarza



Fig. 22: Condition of the Patrimonial house used for admission to the San Francisco metro station. Approach to damages, adjoining house in front of the San Francisco square.

Photo: Gloria Galarza



Fig. 23: Condition of Santa Clara square. historic center of Quito.

Photo: Gloria Galarza



Fig. 24: Underground subway works in the Plaza del Teatro.

Photo: Gloria Galarza



Fig. 25: Underground subway works in the Plaza del Teatro.

Photo: Gloria Galarza



Fig. 26: Underground subway works in the Plaza del Teatro.

Photo: Gloria Galarza

Serial Property of Saint Petersburg: In Need of Complex Solutions for Complicated Systems

Elena Minchenok, ROST Fund and Russian National Heritage Preservation Society (VOOPIK)



Fig. 1: Space, low skyline and a diffuse system of key architectural accents and historically coherent elements of townplanning are main characteristics of the Saint Petersburg World Heritage Property.

Photo: Pavel Nikonov

World Heritage Property No. 540 «Historic Centre of Saint Petersburg and Related Groups of Monuments», inscribed under criteria (i), (ii), (iv) and (vi), belongs to the special category of WHSs named serial properties. This notion refers to complex properties that are comprised of two and more components and/or elements that bear historic, cultural, morphological and typological community. Such complexity inevitably brings forward the issues of common management of a single property, the integral parts of which often are of different nature, type, structure, characteristics and even geographical, territorial, administrative categorization and, in case of transnational properties, national affiliation. National protection and management bodies address the cases following the approaches that depend directly on the nature and structure of the properties, but certain issues supposedly can be seen as common and valid for all the serial properties.

WH Property 540, listed in 1990, is one of the largest and the most complicated among the urban serial sites. Today on act it numbers 36 components and 86 elements on over 23.000 ha of land and water surface, but more than in its formal mul-

ticomponent structure and its actual territorial division between two sub-federal entities (Saint Petersburg City and the Leningrad Region) and water areas, its serial nature lies in the fact that the site is comprised of a group of typologically diverse integrants linked to each other by deep historical and town planning relations. Among these, there are the historic centre of the city itself and the ones of its satellite historic towns, palace and park ensembles (both imperial and private), memorial and scientific buildings and monuments, historic forts and fortresses, features of the natural landscape and elements of town planning structure.

In 1989, after a series of discussions that valued individual buildings and ensembles, a decision was made that all the discussed monuments form a coherent system of interrelated components that cannot be seen as separate entities. It is then that for the first time the experts formulated the idea of complex natural and cultural historic man-made landscape and planning structure, the elements thereof being in a symbiotic relationship and adding value to one another. In a context where heritage protection practice was based on a building to building ap-

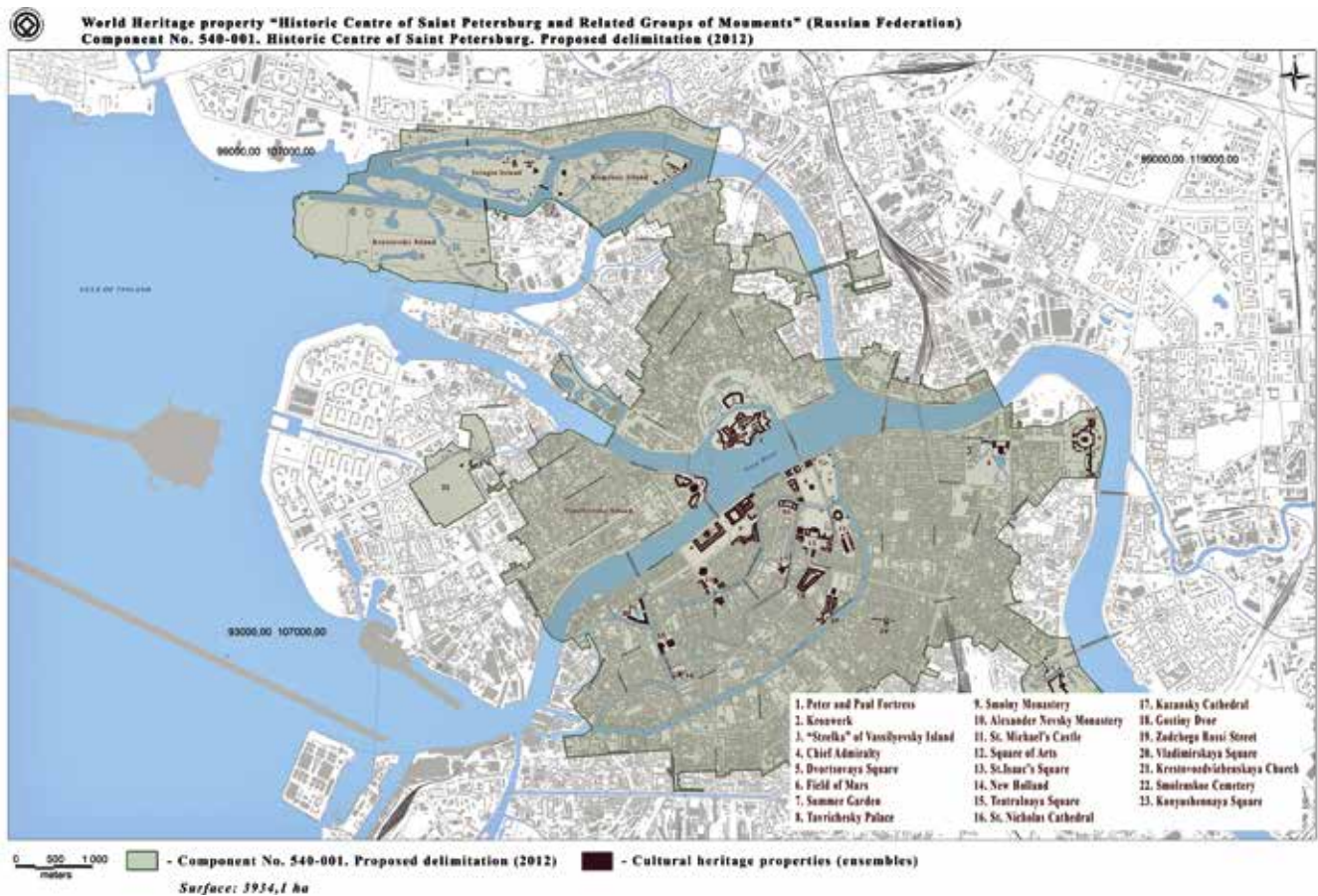


Fig. 2: Map of Component 1 of the Property, "Historic Centre of Saint Petersburg" as of 2013 after clarification of boundaries. Source: <https://whc.unesco.org/document/124187>

proach, it was particularly important to bring forward the idea of a complex compositional unity, where perspectives, views, the interrelation of architectural dominants, skyline and image of the city as a whole are subject to protection.

This idea was rooted in the way architectural heritage protection was shaping up in then Leningrad since the 1960ies. In 1966, the General Plan of Leningrad was amended by introducing the United protection zones (hereinafter UPZs) of monuments of history and culture and the respective Development control zones (hereinafter DCZs). The UPZs regimes intended no modern construction or redevelopment. The DCZs had much milder regulations, and development of the city continued in these areas. The sites that remained at the margins of the UPZs were to be provided with their own protection zones that were calculated as "twice the height of the highest point of the site, or of its largest side" (p. 2 of the Decision of the Leningrad City Executive Committee № 120 of 12.02.1969 "On protection zones of monuments of culture, architecture and history").

Later on, new sites with respective protection zones were introduced (1934 sites under pro-

tection, plus 880 buildings of elevated historic value), thus by mid 1980ies, the density of sites reached the point when the protection zones started to merge. In 1988, the United protection zones and the United development control zones were adopted, covering 3 277 ha (later on growing up to around 4 100 ha), including 491 ha of water surfaces. The zoning area was soon divided into two concentric "circles," with the outer

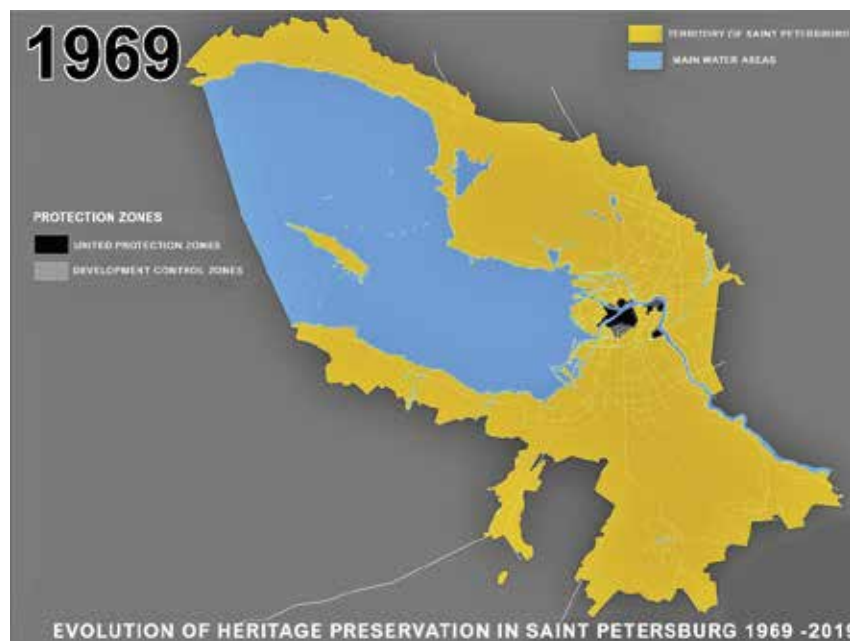


Fig. 3: The United Protection Zones as of 1969.

Map: Pavel Nikonov

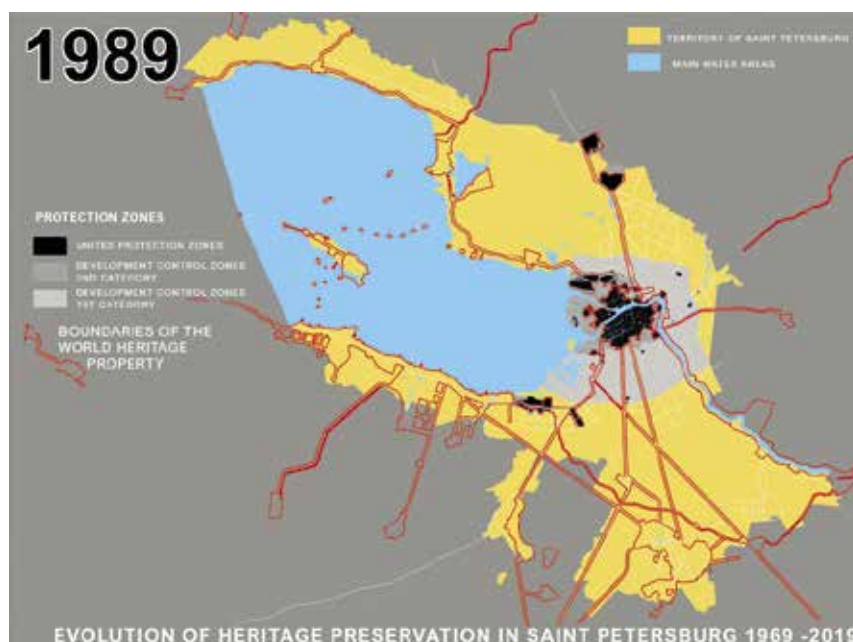


Fig. 4: The United protection zones in 1989.

Map: Pavel Nikonov

being milder in restrictions than the inner one. Later on, the United protection zones of the historic suburbs were introduced, too.

This was the system that in 1989 became the base for the UNESCO WHS nomination.

On June 25, 2002, the Federal Law № 73-FZ “On cultural heritage properties (historical and cultural monuments) of the Peoples of the Russian Federation” was adopted. According to the official definition, a cultural heritage property is recognized as either a standalone building or a monument with adjacent territories or ensembles of buildings. Depending on their composition, cultural heritage properties can be complex and individual, and in accordance with the Federal Law are divided into monuments, ensembles and landmarks that are included in the State Register of Cultural heritage properties and are subject to state protection.

In addition, the Federal Law introduces the concept of historic settlement defined as an urban or rural settlement, within boundaries whose territory cultural heritage properties are located. Currently, the particular historic settlements and landmarks as types of sites are still under development and can be considered more as scientific drafts rather than active mechanisms of heritage protection. Cultural heritage properties categorized as those of federal,

regional, local (municipal) significance and newly identified properties, on the contrary, are active categories that are regularly in use in all heritage protection practices.

Alongside with these federal-level norms and regulations, the local-level Law of Saint Petersburg № 820 “On the boundaries of the united zones of protection of cultural heritage located on the territory of St. Petersburg, the modes of land use and requirements for city planning regulations within the specified zones” that was adopted on December 24, 2008, by the Legislative Assembly of Saint Petersburg. This regulatory document, developed by a large pull of local experts in 2006-2008 on the basis of the General master plan of Saint Petersburg of 2005, coupled with detailed maps of the whole territory of the city and the defined regimes for each type of territorial category, follow up the original

mechanism of the UPZs developed and accepted back in the 1960ies. In recent years, the UPZs and the DCZs were radically diminished.

However, it is this law that today regulates the actual construction and heritage protection activity in the city more than any other norm and can, in a certain way, be seen as a mechanism used in place of a Site Management plan since it covers a large part of its central component.

In case of the WHS 540, a larger part of its territory and the components, or groups of objects located on these areas are

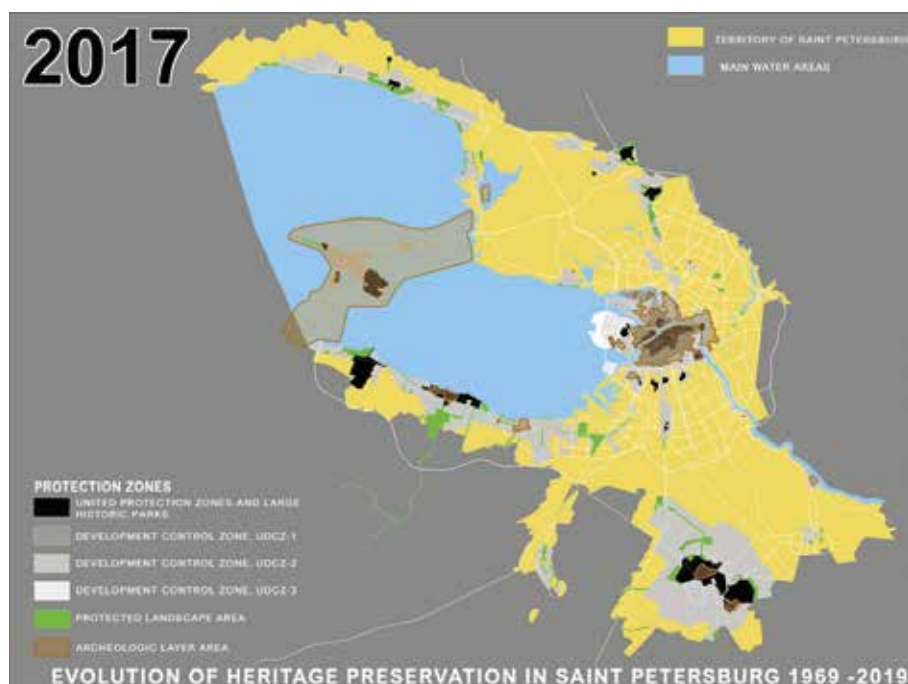


Fig. 5: The United protection zones in 2017.

Map: Pavel Nikonov

in this way or another protected by the national heritage preservation legislative norms. However, an overall comprehensive protection and management plan for the whole system of the serial site is yet to be developed. By 2019, several attempts have been made by the local and national heritage protection bodies to draft a document that would cover the entire property, but due to its complexity and diversity of nature of its components, these attempts have not been finalized yet.

The Guidelines for the Preparation of Serial Nominations to the World Heritage List define them as “a single World Heritage nomination [that] may contain a series of cultural and/or natural properties in different geographical locations, provided that they are related because they belong to: (i) the same historico-cultural group; (ii) the same type of property which is characteristic of the geographical zone; or (iii) the same geological, geomorphological formation, the same biogeographic province, or the same ecosystem type, and provided that it is the series, and not necessarily each of its components taken individually, which is of outstanding universal value.” Hence, the very nature of this type of site assumes a complex structure in which individual components cannot be addressed, for the reasons of their nature, geographical, administrative, structural, morphological or typological characteristics, with a general one-size-fits-all approach.

In the case of WHS 540 this is particularly evident, and the extreme difficulty of outlining a system that could enable a strategy of integral and comprehensive preservation and management of a property extending across the territory of two sub-federal entities and water surface, numbering 36 components and 86 elements of diverse nature and type, is a situation that causes considerable concern.

The Report on serial nominations and properties of May 31, 2010, belonging to the set of decisions of the 34th Session, suggests seeing «promoting and implementing the concept of transnational serial nominations as a tool for international cooperation, shared approaches and thus better management and conservation practice». In the case of transnational sites, the situation is by no means less complex since it implies a need for creating a stable system under several national jurisdictions. However, it would not be correct to say that all «simple» serial sites are easier to manage than the transnational ones.

In this respect, a serial property, whether transnational or located on the grounds of a single State Party, can be seen as a unique platform promoting and supporting cooperation and

teamwork as a general approach to protection of heritage, celebrating diversity, interrelation and interdependence within a stable system.

However, actually operating a serial property, whether transnational or not, requires a specific methodology, approaches that differ from those related to isolated properties, and patterns that involve a largely multiplied group of stakeholders, both public and private. Even bearing in mind that each case of every single site is unique, certain tendencies and objective laws valid for all could be traced by means of more thorough cooperation, analysis and sharing of positive and negative experience between the serial sites in various forms, brought out by horizontal network cooperation between the sites.



Fig. 6: St. Isaac's Cathedral. The value of the main architectural accents of the property depends directly on the regular historic urban tissue as an authentic ambient.

Photo: Pavel Nikonov

In view of the above said, it would be highly appreciated that UNESCO introduced, contributed or encouraged a special form of aggregation and common activity for the serial sites, both national and transnational, that may be realized in form of an event (series of events) dedicated to the particular problematics of this type of WHSs. These activities would ideally be focused on analyzing the best practices, suggesting approaches and formulating methodological guidance to preservation and management of serial sites that share issues of territorial and characteristic inconsistencies. These instruments and activities are very likely to provide significant help to the bodies that operate, manage and preserve the said serial sites and could result in forming up of guidances, tutorials, analysis of data that the relevant heritage protection and management actors could apply to their work.

Preservation of the Territories of Veliky Novgorod and its Surroundings

Iuliia Eremenko, University of Bamberg and Sociological Institute of the Russian Academy of Science

Many cities whose sites have a special status of historic heritage experience situations when various interest groups attempt to use this status for their purposes. As residents of Russian cities gradually become part of the global consumption system after the collapse of the USSR [1], urban economic and political elites in the new capitalist system become more profit-oriented and seek to derive returns from the use of urban areas, in particular through the commercialization of public spaces [2]. Unfortunately, the commercialization of space does not always favorably affect the sites included in the UNESCO list of World Heritage.



Fig. 1: Novgorod kremlin (fortress).

Photo: Yekaterina Nikonova

This paper aims to discuss problems in the territory of Novgorod the Great (Veliky Novgorod) and its surroundings. 37 individual sites inside and outside the city were included in the UNESCO World Heritage List in 1992 under cultural criteria: ii, iv and vi after an original nomination of the entire area of the historic city center had not been accepted by the World Heritage Committee (see Fig. 2).

The purpose of this paper is to show what kind of conflicts associated with the UNESCO World Heritage currently unfold in Veliky Novgorod. Empirically, it relies on a series of semi-structured interviews with experts in urban history, city development and placemaking (representatives of city administration, urban activists, and museum workers) as well as a survey where both urbanites and tourists took part.

Experts note that in the schools of Veliky Novgorod, in the lessons on local history, particular attention is paid to the listed UNESCO buildings. For example, at the Museum of the Cathedral of St. Sophia a separate department focuses on educational programs for preschool and school children to inform them on UNESCO World Heritage in the city. Indeed, city residents and even tourists know that the objects located in Veliky Novgorod have UNESCO World Heritage status. However, not all the properties that are inscribed in the UNESCO World Heritage List of "Historic Monuments of Novgorod and Surroundings" are known to locals and tourists. In total, in Novgorod and its surroundings there are 37 UNESCO World Heritage sites, but people usually symbolically transfer UNESCO World Heritage status from these objects to the city as a whole.

Meanwhile, experts rather emphasize the division of the city into zones where the heritage sites are concentrated and where it is, therefore, impossible to begin new constructions, and other zones where there are no UNESCO heritage sites and that are open for construction, sometimes rather chaotic. City activists consider the status of cultural heritage primarily as putting additional responsibility on the local administration and residents but also on the international community because the preservation of valuable sites requires special efforts.

Generally, residents believe that it is necessary to protect the monuments that have received UNESCO status, however, they do not take part in any protection activities for several reasons. First, at the moment, the residents, unlike those of bigger Russian cities such as St. Petersburg or Moscow, do not see any acute threat to these monuments, and thus do not feel the need for any active measures to preserve them. Second, most of the residents do not believe that they somehow affect, or can affect, the events in the city, and thus do not participate in local politics in any form. As a result, none of the respondents mentions how to specifically protect the sites: Since people do not participate in political life, they are not aware of available political and administrative leverages of contestation over urban land.

The interest groups that take the core efforts aiming at receiving and maintaining the status of UNESCO World Heritage in the city are the city administration, educational institutions in-

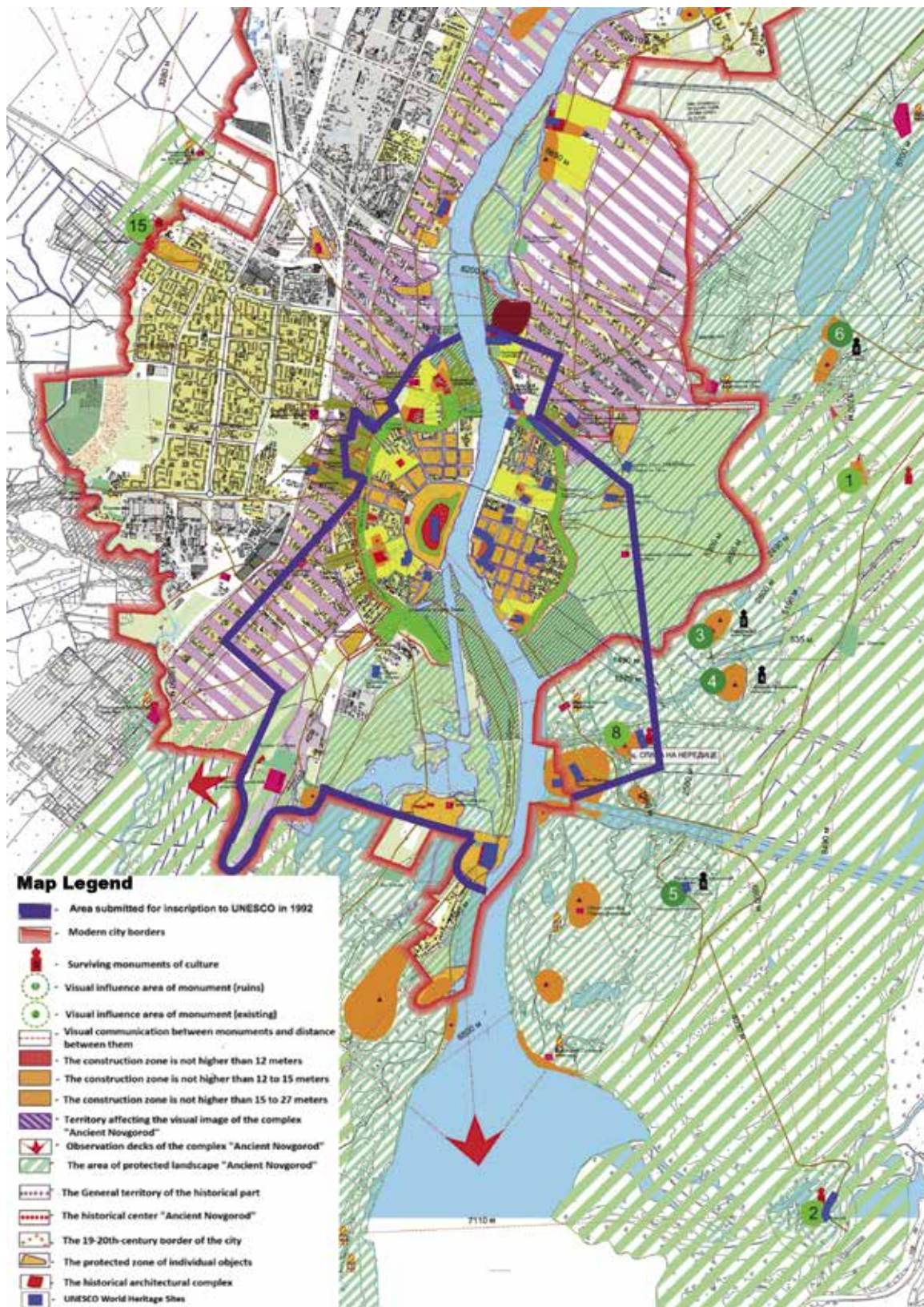


Fig. 2: Map of Veliki Novgorod showing the area of the original – rejected – nomination (blue boundary), the 37 individual objects which were inscribed (blue), and the different protection zones of the city. Map: <https://www.adm.nov.ru/spage.xhtml?docid=52> / adapted by Iuliia Eremenko, Andrea Martinez

cluding the departments of educational programs at museums, and local activists. Participation of the local government was described as active when the city was inscribed in the World Heritage list, but now it is reported to have decreased.

Meanwhile, experts focus on the division of the city into zones where heritage sites are concentrated and where sporadic development occurred. In the former, it's impossible to construct new buildings or find areas without UNESCO heritage sites.



Fig. 3: St Sophia Cathedral, the oldest building in Novgorod. Photo: Sergey Gorbachev

Such development mostly appeared in the Soviet and post-Soviet times. Because of this fact, Veliky Novgorod did not receive the status of UNESCO World Heritage as a single integral object: "...the fact that we destroyed the environment in which the monuments would look organically, the integrity of the urban appearance", {Museum worker 1} witnesses. Museum workers and activists agree that the failure of attempts to preserve the authentic architectural complex has led to the fact that construction on areas free of UNESCO heritage sites is actively conducted even now: "... on the other hand, it is the lack of security status which later played a negative role, because nowadays, let's say, the Eastern and Southern neighborhoods of Novgorod, not having the status of UNESCO sites, are actively built up into faceless cottage building, faceless buildings, and in general there is now no shadow of the [authentic] complex, which was here 26 years ago ..." {Museum worker 2}.

City activists have been opposing construction companies and private developers for many years. For example, already in the 1970s, they resisted one unfavorable, in their eyes, construction project: "We fought! We even reached the Supreme Court of the USSR! And construction was prohibited, but as soon as the collapse of the country came, everyone began to build up" {Urban activist 1}. As we can see, according to experts, in Soviet times, activists had a real chance to achieve state protection of the territory from development. In modern conditions, when politicians see commercial profit as a priority of urban development, there is almost no chance of receiving assistance from the state in the protection of the entire territory of the historical center of Novgorod.

According to experts, chaotic, uncontrolled development destroys the very idea that has long laid the foundation of urban planning in Novgorod. According to the original plan, St. George monastery should be visible from every point of the city. As noted by the informants, historically, this position of the monastery was part of the system of informing citizens in case of external, including military, threats. Besides, the churches of the St. George monastery and other city churches served as important spatial reference points for citizens and visitors and at the same time symbolic representations of Novgorod. The city activists see their victory in the fact that they managed to ban high-rise construction in the 1960s and to preserve this idea, which has been incorporated into the city planning since ancient times. However, the decision to limit the altitude only for some time suspended the construction of the center of Veliky Novgorod but did not stop it completely.

The city administration uses the UNESCO status to present Novgorod to the public as an attractive tourist destination. The officials who currently hold core positions in the city constantly emphasize how hard it was to obtain this status for the city,



Fig. 4: Preparation for the construction of a new cottage settlement near St. George Monastery - Yurievskoe Chaussee 151 (53:23:8815102:159, 53:23:8815102:157).

Source: <http://vozt12.ru> (June 2018)

even though they did not participate in the process personally back in 1992. Experts reveal a conflict between historians and city administration that has been unfolding for the past five years. The reason for the conflict lies in their colliding approaches to archaeological excavations. The city administration is trying to reduce the territory of excavations. They want to use part of this territory for the construction of residential buildings. In their turn, archaeologists believe that it is impossible to limit the area. The excavations must be gradual, they argue, and the creation of residential buildings will harm this.

Representatives of the city administration are focused on profits derived from the commercial use of urban space, which was not the case in Soviet times. They use the term “мертвая зона” [dead zone] when they speak of places listed by UNESCO and want to develop construction projects on these areas. However, legally, to define the price of a piece of land, museum workers and archaeologists are needed, and only when confirmed that “the land is of no historical value”, a construction permit can be issued. “The “Trading part” [a historical district of the city] will soon be full of abandoned sites that we clear from dilapidated houses, but no one takes them for new construction because full-scale excavations need to be carried out there”, the mayor of Veliky Novgorod, Yuri Bobryshev, says [3].

The Deputy Director of the Institute of Archeology of the Russian Academy of Sciences, Peter Gaidukov, responds to the officials’ claim: “...so it turns out that the archaeological heritage of Russia is hampering everything, especially in Novgorod, where the Okolny town [Ostrog (fortress)] of the late 14th century includes 300 hectares of Russian land – this is a cultural layer with a thickness of one to eight meters, which can be compared to a grand archeological storeroom. The study of its contents gradually opens up an absolutely extinct ancient Russian city and allows us to take a fresh look at the world not only of Novgorod but also of the entire Russian Middle Ages” [3].

The actions of the administration on forced excavations may result in a situation where part of the city will be built up without archeological research, which will entail a change in the image

of the city as a whole and will lead to the dramatic outcome that priceless relics will be lost, and objects included in the UNESCO list will suffer. Archaeologists do not agree to conduct excavations because they believe they will not be able to save or analyze the findings with the current level of technology.

Conclusion

The current evidence from Veliky Novgorod signals that cultural heritage in this city is under threat. The efforts to derive profits from commercial (re)development of attractive spots of land in the city undertaken by the city administration and construction companies will have a profound impact on the state of cultural heritage sites. Today, construction has already started on areas that have proven archaeological and cultural value and are located very close to UNESCO sites. The administration of Veliky Novgorod openly declares that it would like to use these territories for commercial housing and exerts pressure on archaeologists and historians to carry out excavations, which will make it possible to erect high-rise buildings in the city center. This, in turn, will destroy the entire landscape of and perspective over the city, and affect the perception of UNESCO sites by city-dwellers and tourists.

My advice is to establish a special Committee aimed to stimulate more coordinated action of archaeologists, city administration and construction companies. This will benefit the city and allow to preserve its cultural heritage.

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Liverpool Mercantile Maritime City

Gerry Proctor, Engage Liverpool



The role of Civil Society in protecting our World Heritage Site (WHS) has never been more necessary. Engage Liverpool is a civil society actor and not-for-profit social enterprise. We sit on the Liverpool WHS Steering Group as well as being a member of World Heritage Watch for the past two years and have attended the World Heritage Committee (WHC) meetings in both Krakow (2017) and Bahrain (2018) to plead directly to the UNESCO ambassadors on behalf of the city of Liverpool. It was an expensive decision, especially for the Bahrain WHC meeting which we financed entirely through crowd-funding. We raised the exact amount required to be able to attend the meeting, and hundreds of people each gave a small amount to make sure Liverpool's voice was heard in Bahrain.

That was something of a high-point for us to be able to speak directly to the WHC ambassadors. It was the continuation of our Seminar Series in the autumn of 2017 *Liverpool UNESCO WHS – A Status Worth Fighting For?*¹ when we brought to our city the voices of three speakers with strong associations with UNESCO whose contribution had an enormous impact on the many citizens who attended each seminar. We built upon that significant achievement in 2018 with our Seminar Series *WHS Cities of Inspiration*² by inviting three WHS cities to share with Liverpool how they were making the best use of their UNESCO status especially in the realm of regeneration, design and planning. Strasbourg, Bordeaux and Hamburg each sent important delegations that included Mayor Roland Ries of Strasbourg and major architects from each city. Good numbers attended each seminar, and the three seminar venues in the WHS were at capacity. All of this was financed by local sponsorship funding.

However at the end of the year Everton FC (one of the city's two Premier League Football Clubs) launched a major public consultation campaign that toured the city gaining support from large numbers of

people for what they've branded *The People's Project*, which is their plan to build a new football stadium on the Bramley-Moore Dock, part of the inscribed WH property. This has been in the background for some time and has the support of the landowner Peel Land and Property Liverpool Waters (who entered into an agreement with Everton FC in November 2017 for use of the site) and the City Mayor Joe Anderson (who as well as being a supporter of the club has promised to use the city's ability to borrow money at favourable rates to underwrite the project). The first EFC stadium plans on the Waterfront were announced for Kings Dock in 2001 and finally collapsed in April 2003. There is a determination that this won't happen again.

This is a very challenging time for civil society in Liverpool. Some historians argue that because some of the major sites today in the city were formally in-filled docks then it is a precedent that can be followed with impunity. For example the world-famous Three Graces on the Waterfront are built upon the filled-in Georges Dock³ (built 1771 and buried in 1899), and the Liverpool One project was built upon the original Old Dock⁴

³ https://en.wikipedia.org/wiki/George%27s_Dock

⁴ http://www.liverpoolmuseums.org.uk/maritime/visit/old_dock_tours.aspx and https://en.wikipedia.org/wiki/Old_Dock



Fig. 1: Public Participation at the Consultation Exhibition.

Photo: The People's Project

¹ <https://www.engageliverpool.com/seminar/world-heritage-site-2017/>

² <https://www.engageliverpool.com/seminar/unesco-whs-cities-of-inspiration-2018/>



Fig. 2: Aerial view of the Bramley-Moore Dock. The site of the planned stadium is outlined in red.

Photo: Richard Hook/Property Week

site stresses: *The historic dock structure and walls will be protected by the way we plan to infill the dock, ensuring we minimise the impact on its historic features. And more: We are also proposing to retain a water channel within Bramley-Moore Dock. This will preserve the connection between the docks from north to south Liverpool⁷* (image 6 in the footnote).

While considering these statements it is worth pausing a moment to take a look at the Liverpool Maritime Mercantile City WHS Supplementary Planning Document⁸ adopted October 2009 which contains all the guidelines for proposed developments in the WHS and Buffer Zone.

(built 1715 and buried in 1826). Manchester Dock⁵ (building started in 1780s and it was buried in 1936) is now the site of the new Museum of Liverpool. However all of this is well before Liverpool applied for UNESCO WHS status, and if we were to continue this traditional process we would eventually have no docks left at all. This argument citing historic dock infilling was used by Everton FC in their public campaign⁶ (images 6 and 7 in the footnote): *“However, Liverpool has a long history of imaginatively reusing abandoned docks and giving them a new lease of life. Our proposal follows this tradition.”* But this time they are deciding not to fill it in completely but to leave a small channel of water linking the north and south docks and not to damage the dock walls in the process, as their web-

Section Four is about General Guidance for Development, and there is a specific element on Dock Water Spaces (4:7 p.63). 4:7:2 states clearly referring to the historic practice of infilling redundant docks: *However, the surviving docks in the WHS and BZ represent a significant part of the “biggest and most complete system of historic docks in the world” and so any development, which would compromise that globally superlative system, would need exceptional justification.* That paragraph goes on to state: *These docks create a distinctive dockland landscape that forms an essential part of the WHS’s character and OUV. It is essential that the fundamental integrity of the docks as open water spaces is retained* (original highlighting). 4:7:3 says that: *The water bodies within these docks are*

5 <https://historic-liverpool.co.uk/manchester-dock-lost-museum-liverpool/#> and [https://en.wikipedia.org/wiki/Manchester_Dock_\(Liverpool\)](https://en.wikipedia.org/wiki/Manchester_Dock_(Liverpool))

6 <https://peoples-project.co.uk/consultation/>

7 <https://peoples-project.co.uk/consultation/>

8 <https://liverpool.gov.uk/media/9644/world-heritage-site-spd.pdf>

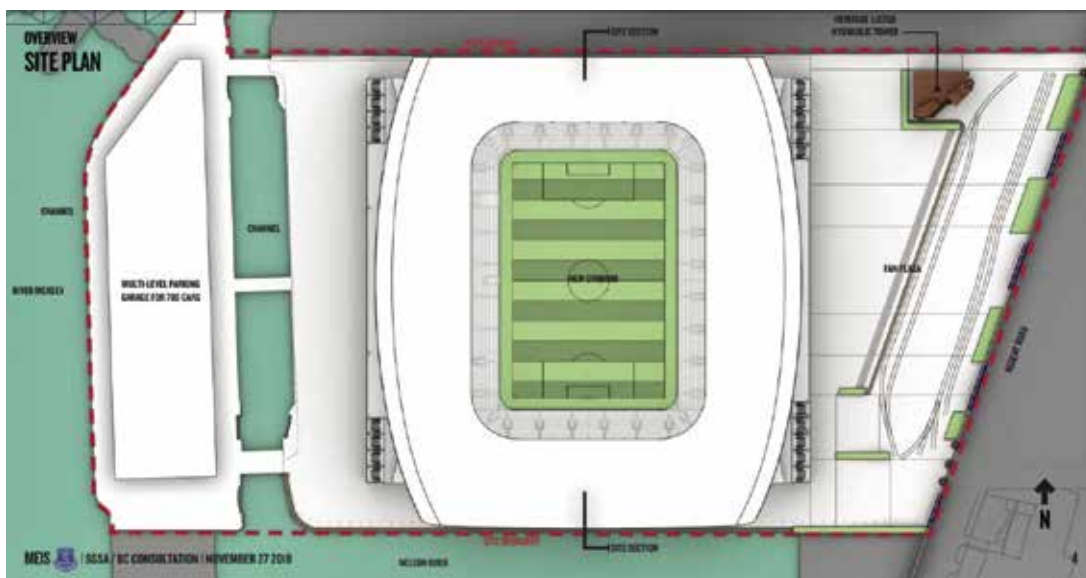


Fig. 3: Site Plan for the new construction.

Image: Meis SGSA BC Consultation / www.evertonarentwe.comEFC.pdf

fundamental to their character and historical importance. The document goes on to explain in 4:7:6 that as a consequence of the directives listed: development in these areas will need to reflect the need to protect the setting of the conservation areas (Policy HD12). The water spaces are a key aspect of the setting in that they provide open visual linkages and clear historical functional linkages that enable people to understand the operation and interrelationships between the different areas.

In other words there is an issue around legibility of the site which means that future generations should only need to look at the dock and its water space to know what they were and imagine how they were used from their inception. 4:7:7 goes on to state: *In this context it is considered inappropriate for existing water spaces within the docks that survive within the Buffer Zone to be infilled* (original highlighting). *The only exception will be where permission has previously been granted for partial infilling and where circumstances have not changed sufficiently for any similar proposals to be resisted in the future. The retention of open water is considered by the council to be highly desirable in terms of retaining the character and value of these spaces in both historic and urban design terms.*

Really it couldn't be clearer and so you might well ask how has the proposal for a stadium to be built upon the Bramley-Moore Dock got so far without the Landowner, the City Council, the football club or the WHS Steering Group saying that it won't pass the tests that the City of Liverpool has established and laid down? The document does make clear that plans for structures to be built within the water spaces can be considered on condition that: 4:7:10 ii) **such structures not dominating a water space by virtue of its coverage** iii) **the water space remaining the dominant characteristic element** (original highlighting). That will not be the case with regard to a football stadium. 4:7:11 goes on to state that: **v) the new development being proven to enhance the OUV of the WHS. All such proposals should therefore generally only occupy a small proportion of the overall water space and not dominate that water space** (original highlighting). In the face of these professional arguments, those currently in power, with apparent overwhelming public support and political influence, clearly feel that it is worth all the effort to force their project through.

It must be said that Engage would like to see a new stadium built for Everton FC within the city as well as the regeneration of North Liverpool but not at the expense of damaging the infrastructure of the dock system and losing our UNESCO WHS status. There are many other options including remaining at Goodison Park and expanding the present stadium as well as a site within Liverpool Waters where there are no dock structures above ground, plus industrial land close by that could be re-purposed for a stadium. In a world where cities are vying with each other to have some outstanding and unique selling point, having a world-recognised heritage status should be enough to make the politicians and business leaders as well

as academics determined to protect, conserve and enhance that status – but apparently not in Liverpool. We have the Vice-Chancellor of Liverpool Hope University and a member of the Mayoral Task Force set up to secure the status, formally endorsing the proposals on the Everton website⁹ despite the known risks to that status if those proposals are submitted.

The main reason Liverpool was placed on the List of World Heritage in Danger was because of the perception that the Management Plan was not sufficiently robust to be able to limit threats to the outstanding universal value of the site. These issues are now being tackled successfully but it is the looming football stadium proposal that would eclipse these concerns and lead to an almost automatic deletion. Concerned citizens have grown used to this risky behaviour on the part of the City Council and Landowner, and the issues were widely reported even in the national press as far back as 2017 about the threats being posed to Liverpool's UNESCO status¹⁰. It was deemed to be a very positive sign when the Mayor of Liverpool announced 2 days before a senior UNESCO speaker was due in the city to inaugurate the Engage Seminar Series of 2017 that a Mayoral Task Force¹¹ had been set up to 'rebalance our relationship with UNESCO'. The subsequent UNESCO WHC decision not to delete Liverpool was recognised as an important achievement and reported by the BBC¹², Liverpool Business News¹³ and Save Britain's Heritage¹⁴.

The city has been on the 'World Heritage in Danger' list since 2012 due to concerns about the harmful impact of large scale new development – particularly the Liverpool Waters proposals. If implemented as proposed this highly contentious scheme would have seen the construction of several skyscrapers along the waterfront, the tallest with 55 storeys. Unusually that scheme has planning permission valid until 2042 indicating an exceptional relationship between the developer/landowner and the City Council. In July 2017, UNESCO issued a strong warning that Liverpool would be removed from the list of World Heritage Sites in 2018 unless major changes were made to the way its historic waterfront was managed.

Discouragingly just when you think a corner has been turned another one comes at you which is even more dangerous than the first! This time the stakes are very high and there are few if

9 <https://peoples-project.co.uk/city-voices-professor-gerald-pillay-vice-chancellor-liverpool-hope-university-on-the-opportunities-that-await/>

10 <https://www.theguardian.com/uk-news/2017/jul/01/final-warning-liverpools-unesco-status-at-risk-over-docks-scheme> (01.07.17)

11 <https://www.theguardian.com/uk-news/2017/oct/03/liverpool-world-heritage-site-threat-taskforce> (03.10.17)

12 <https://www.bbc.co.uk/news/uk-england-merseyside-44611839> (26.06.18)

13 <https://lbdaily.co.uk/liverpool-set-keep-world-heritage-status-come-off-risk-register-within-weeks/> (01.06.18)

14 <https://www.savebritainsheritage.org/campaigns/item/499/Press-releaseSAVE-welcomes-UNESCO-draft-decision-to-retain-Liverpool-World-Heritage-status> (07.06.18)

any organisations willing and able to lead this fight to the citizenry in an informed, candid and impartial manner now that Everton FC have made sure that a significant number of people have been persuaded to back their proposal for Bramley-Moore Dock. This also makes it extremely unlikely that any politician who was minded to support the UNESCO status would now be able to do so. Our only hope lies with national government. It is the British Government that signed the agreement with UNESCO to protect and conserve the World Heritage Sites within its domain and if it allows the football stadium to go ahead it clearly has been unable to live up to its commitments. So we shall be asking that in the event of a planning application coming forward (promised for autumn 2019) it will be called in for decision by the Secretary of State for Housing, Communities and Local Government.

Liverpool will be incapable of making any decision that protects its global heritage status.

As far as UNESCO in Paris is concerned there has been no proposal made for a football stadium so far and therefore they are unable to make any comment at this stage. It is worth noting that the stadium was never part of the original Liverpool Waters application which was passed by the City Council's Planning Committee. Despite a new DSOCR being sent to the Mayor's Cabinet for approval on 22nd February 2019 which continues the good work commenced by the Council in addressing UNESCO's concerns, there is no mention of the proposed stadium in the document, and as such we are currently left waiting for Everton FC to send their plans for approval. As it is common knowledge in the city and the country that Everton FC will propose a new stadium at Bramley-Moore Dock, we ask that UNESCO request from the UK State Party what information they currently have, and should the proposal come forward what would be their response?

The City of Vienna Allows a Real Estate Developer to Dictate His Land Use Plan



Herbert Rasinger, Initiative Stadtbildschutz Wien

The world heritage site „Historic Centre of Vienna” (Austria, C 1033) is in danger of being destroyed by a huge real estate project of investor Mr. Michael Tojner. It includes the construction of 2 high rise buildings in the core zone of this UNESCO World Heritage. This historic center is in a city area where buildings erected in the 2nd part of the 19th century have an average height of 26 meters. The planned high rise buildings have a height of 66,3 m and 47,3 m.

Our concerns are in line with the World Heritage Center (WHC) recommendations:

- The planned **high rise buildings with a height of 66,3 m and 47,3 m** would dwarf the buildings in the immediate vicinity as e.g. the concert hall (Konzerthaus) and all the surrounding buildings.
- One of the most important visual axis – **from the upper Belvedere** – will be heavily damaged. 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, its OUV.

Vienna City Council’s vote on June 1st, 2017 for two high rise buildings

Although many architects, city planners and NGOs have warned the mayor and the city council, the Vienna City Council nevertheless voted on June 1st, 2017 in a narrow 51 of 100 vote for

this gigantic real estate project in the UNESCO world heritage core zone. The consequence was that Vienna was put on the **red list of heritage in danger** five weeks later on June 6th, 2017 at the UNESCO World Heritage Committee meeting in Krakow. This behaviour of the City of Vienna was clearly against the UNESCO convention, which the Austrian government had signed on December 18th, 1992.

Austrian Ombudsman Board intervened

The Austrian Ombudsman Board (AOB) has been monitoring the public administration since 1977 based on the Federal Constitution. The Board examined also the behavior of the Vienna City Council thoroughly and issued a statement in December 2017 of **a serious deficit in the field of urban planning** in Vienna. Furthermore, the Board handed over an official report to the Viennese Municipality concerning its **misadministration**, in this case approving Mr. Toner’s project.

Assessment of environmental effects

Although Vienna has a law regarding the assessment of environmental effects of city planning projects, especially when the UNESCO World Heritage is at risk, the Mayor of Vienna issued on 16 October 2018 a legal statement that the project developer Prof. Dr. Michael Tojner is exempted (!) from submitting an assessment of environmental effects.



Fig. 1: View from the Schwarzenberg Square with the volume of the two planned high-rise buildings indicated.

Photo: Kupf/Initiative Stadtbildschutz

The area in the core zone will be completely sealed and covered with concrete. This new urban heat island will be built in case that Tojner's project will go through. Surprisingly the Green Party of Vienna supports the construction of this new urban heat island of about 2,4 ha. In the following national election, the Green Party was voted out of the Austrian parliament.

Lodging of an appeal – successful

Several citizens of Vienna and the organisation 'Alliance for Nature' lodged an appeal against this legal statement of the mayor. They won the case at the next court, the Higher Administrative Court.

The Austrian Ombudsman Borard issued a statement on April 11th that the city of Vienna should abide by the decision of the Higher Administrative Court.

So far, Vienna did not show any signs that it will abide by this Higher Administrative Court decision issued in March 2019. The mayor and/or his envoys travelled to Paris and tried to persuade the UNESCO WHC to accept this real estate development project of Mr. Tojner. They think that UNESCO will get weak and that Vienna can get a political decision by UNESCO to get this project approved just as this was the case with the "Wien Mitte Towers" building project in the year 2003 when UNESCO finally gave in.

The previous "Wien Mitte" case in 2003

But there is a difference: The "Wien Mitte Towers" are in the buffer zone of the world heritage and not in the very core zone. Secondly, the Tojner project definitely destroys the OUV of the "Vienna Historic Centre" as all last four professional expertises ordered by the Minister of Culture have proven.

For three years (2000–2003), the UNESCO WHC was very unhappy with Vienna's behavior and did not issue the official letter about the inscription of "Vienna historic Centre" in the UNESCO list. Vienna had to wait until October 2003 to receive this official document of the inscription on the list of world heritage. Vienna succeeded to persuade UNESCO to agree to the "Wien Mitte" project.

Management Plan for Vienna's World Heritage

This decision of the City of Vienna in 2017 for the Tojner high-rise building project is completely contrary to Vienna's obligation in its Management Plan for Vienna's World Heritage sites published in 2006.¹

"Areas where no high rises may be built are defined as exclusion zones... They comprise all world heritage sites in Vienna."

The city of Vienna does not abide by its own rules submitted to the Austrian Government and to the UNESCO WHC in Paris.

New government in Austria since December 2017

Since December 2017 Austria has a new national government, including a new minister for Cultural Affairs who seems to care more about culture and more about UNESCO than his predecessor. The new minister held a conference on February 1st, 2017, and announced the following steps:

- Workshop with independent experts on March 14th, 2018
- "Heritage Impact Assessment Report"
- "Advisory Mission" mit der UNESCO in autumn 2018

All expert opinions of the above steps decided against Tojner's high-rise building project.

Vienna refused so far to rectify its city development plan 7984 of these 2 high rise buildings.

Vienna is **sticking its ground** on the decisions being taken, but Liverpool is now (at least in principle) making attempts to try and resolve the issue in a manner acceptable to all. Vienna is not.

The primary issue in Vienna is that **alterations in legislation are making it possible** to conceive and grant permissions for developments that violate the integrity and authenticity of the site. Several such proposals are slowly permeating the historic urban fabric which will collectively lead to a loss of historic value and identity. The City of Vienna seems to consider heritage as an obstacle rather than an enabler of development.

The Minister of Culture Affairs

So far, the government of Austria says that they want to preserve the UNESCO world heritage for Vienna, but the government has not yet taken the necessary legal steps to abolish the Vienna City Council's controversial decree of June 1st, 2017.

Due to the disobedience and clear breach of its agreement with UNESCO by Vienna, the Austrian Government might consider to intervene in the legal system of Vienna and to **stop** the real estate project of Mr. Tojner detrimental to world heritage „Historic Centre of Vienna (Austria) (C 1033)".

¹ see "Vienna World Heritage The State of the Art" ISMN 3-902015-97-7 and ISBN 978-3-902015-97-6, page 95).

Gjirokastra, a Chronicle of Loss

Kreshnik Merxhani and Valmira Bozgo

In 2012 in a Reactive Monitoring Mission of ICOMOS, a few problems were mentioned with regards to the Gjirokastra site, negatively affecting its conservation among which the most prevalent ones are the:

- Lack of clear law outlining responsibilities
- Illegal construction
- Lack of clear requirements for objects that were considered world heritage
- Need for a management plan, archeological excavation plan, etc.

While only partial progress has been made in addressing these problems, new concerns have arisen.



Fig. 1: Due to the lack of a regulatory framework and its enforcement, most parts of present-day Gjirokastra are a mix of dilapidated and ruined historic buildings, inappropriate new constructions, and everything in between, resulting in a worrisome loss of visual integrity.

Photo: Stephan Doempke

1. Delisting of 200 Monuments

In 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 requirements from UNESCO through its Reactive Mission of 2012. The civil society engaged in preserving the Outstanding Universal Values 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:

- a) The reduction of the number of monuments by 43%, leaving out objects that deserve the monument status.
- b) 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.
- c) 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 some monuments embodying the OUV have been delisted (Fig. 2).



Fig. 2: Example of a new listing (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 OUV. In the 2014 State of Conservation Report it is described as a "New Building within the Historic Center of Gjirokastra".

Photo: Stephan Doempke

- d) 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.

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)

2. Comment on the State of Conservation Report

1. Law on Cultural Heritage (p. 5)

The Law has been adopted but in order to come into effect, further documents must be adopted. For these documents there is a time limit of 24 months after adoption of the Law, but 7 months have passed and none of them has been adopted.

2. Illegal constructions (p. 11)

With regards to illegal construction, that at the time had become the norm, we had a reaction in 2015 by the Government of Albania, with a declared nationwide construction moratorium. Illegal construction had stopped since then but has started again recently with small-scale interventions.

3. Level of Preservation of the typological characteristics so far maintained / Level of the state of conservation of the buildings and open areas (pp. 12/13)

It is surprising that, while precise figures are given for Berat, only a general assessment is made in one single sentence about Gjirokastra in spite of the fact that figures are available.

In 2015–2016, a comprehensive “Condition Assessment and Categorization for Interventions [of] 650 Declared 1st and 2nd Category Monuments In Historical Core of Gjirokastra for Conservation of Tangible Monuments” was conducted in cooperation of the NGO “Cultural Heritage without Borders”, Epoka University and the Regional Directorate for National Culture of Gjirokastra (the regional branch office of the Ministry for Culture).

A summary of the report on this project states:

- “Designated monuments of 1st and 2nd category as verified through condition assessment are in a **critical condition** [emphasis ours]. 169 monuments have resulted to be in poor and very bad overall condition out of which 35 are ruins. ... 51 monuments are seeking most urgent interventions and further 40 require urgent interventions.
- “Illegal interventions have affected 357 monuments, which represent more than half of a monument fund. Out of 357 monuments being modified, 122 have lost all their monumental characteristics. Further 170 are transformed almost totally.

- “Vacant monuments still represent the biggest threat for monuments. Today in Gjirokastra there are 79 non-occupied monuments (not calculating ruins to this figure) and their condition is worsening.” (Hadžič, Lejla and Elena Mamani 2016 p. 64¹)

The full report has never been published. In view of its shocking figures, we encourage the WH Committee to obtain this report from the State Party and familiarize itself with its details.

4. Level and adequacy of funding-financial resources (p. 14)

Again, it is difficult to understand why figures can be provided for Berat while no figures are given for Gjirokastra when it is the same governmental unit who oversees the budgets for both towns.

According to our – unconfirmed – information the budget available for the entire Region of Gjirokastra, including more than 150 cultural monuments in addition to the Historic Center of Gjirokastra, has been around 20.000 € in 2018.

5. Ongoing Projects in the Historic Centre of Gjirokastra (p. 22)

Although according to the SoC Report no final permission has been given for the construction at the ex-Fantazia Bar-Restaurant, construction has already started and according to information from 2 February 2019, is continuing on a daily basis.

In addition, a major construction is underway in the Partisani (formerly Tekke) neighbourhood of the Historic Centre, immediately below the citadel (see Fig. 3 and 4). The plot in question is a former police shooting exercise ground which has been bought by the owners of Hotel Gjirokastra, and according to unconfirmed information, they have been given permission by the government to construct another hotel building on this site.

After the recent example of the Kodra Hotel, this would appear to be yet another project with obvious impact on the visual integrity of the Historic Centre which has not been submitted to the WH Committee for approval according to §172 of the OG. Furthermore, this is one of the very few unbuilt and even plots in the Historical Centre, and in immediate vicinity to the bazaar of greatest potential value as a parking area should the bazaar ever be closed for through traffic. This option may now be lost.

For none of these projects, and neither for the drafting of the SoC Report, the Ministry for Culture has sought the opinion of its Regional Branch Office.

¹ Hadžič, Lejla and Elena Mamani (2016): Condition Assessment and Categorization for Interventions 650 Declared 1st and 2nd Category Monuments in Historical Core of Gjirokastra for Conservation of Tangible Monuments. Monumentet No. 54/2 2016, p. 64. Tiranë: Instituti i Monumenteve të Kulturës “Gani Strazimiri” http://imk.gov.al/site/?page_id=3223 The full report is available in Albanian language: Hadžič, Lejla and Elena Mamani (2016): Vlerësimi i gjendjes së 650 ndërtesave të declaruara si monumente të parë dhe të dytë në Qendrën Historike të Gjirokastrës dhe kategorizimi i ndërhyrjeve. Monumentet No. 54/2 2016, pp. 55-63. Tiranë: Instituti i Monumenteve të Kulturës “Gani Strazimiri”



Fig. 3: Construction of a new building of Hotel Gjirokastra, January 2019.

Photo: Kreshnik Merxhani



Fig. 4: Location of the new construction (empty space at the center right of the photo). Photo: Stephan Doempke

6. Rehabilitation of infrastructure and restoration of cobblestone streets in the Bazaar

According to our information, this project is not implemented according to heritage conservation standards, and we are wondering whether the project has been submitted to the WH Committee for approval.

3. Today's challenges

We would like to raise awareness regarding a few more problems of this World Heritage Property that go beyond the legislative and institutional framework which addresses the site as a protected world heritage. The following are concerns that relate specifically to the city's social and natural conditions, that constitute a threat just as urgent.

- **Home abandonment:** Following the collapse of the communist regime in 1991, and then again following the collapse of the nationwide pyramid scheme in 1997 and the ensu-

ing collapse of law and order, many citizens have emigrated, without an intention to ever return. This has led to many of the protected houses to be vacant and left without care for extended periods of time. Without the proper maintenance, these Ist and IInd category homes are bound to collapse and become ruins. This is happening on a continuing basis. We are submitting together with this report a photographic documentation of those houses which have collapsed between 2015–2019.

- **Ownership:** During the communist period many family houses were disappropriated as part of the fight against feudalism, and transferred to party and military officers. With the move from a regime that did not recognize private ownership to a democratic regime, the inheritance law has been changed. Many emigrants became co-inheritants of heritage buildings and have to agree to any intervention. Without having preserved proper documents while the city's cadastre was lost in the looting and burning of 1997. The state has been slow in facilitating the return of the houses to their rightful owners. With ownership in limbo, many houses abandoned and nobody to take care of them, the houses are doomed. At the same time the privilege or responsibility to maintain the houses cannot be transferred to anyone else due to lack of ownership documentation.

- **Geology:** Gjirkastra's architectural ensembles lie along several hills in the neighbourhoods of Çfakë, Pazar i Vjetër and Dunavat II. This alone makes for very difficult terrain for conservation. However the geography is only the beginning of this site's challenges. The

identification of geological problems has started in 1980, with the studies of the Academy of Science – Seismological Centre of Tirana, cautioning with regards to massive rock dislocations, especially under the Gjirkastra Castle. Further red flags were then risen by the Torresi study² mentioning a later confirmed geological fault under the castle going throughout the entire city.

Keeping in mind these inherent problems of this city and the lack of care, it is no wonder we continue losing protected buildings.

² Torresi F., "Alla Scoperta della Città di Pietra. Piano di Ricupero per Centro Storico – Gjirkastra". Gjirkastra Municipality, 2006

Photographic Documentation of Collapsed Houses, 2014–2018

All photos by Kreshnik Merxhani

First Category Houses in the Historic (Core) Zone



Fig. 5: Cani House, Hazmurat - 11 Janari Quarter



Fig. 6: Galanxhi House, Hazmurat - 11 Janari Quarter



Fig. 7: Kokalari House, Palorto Quarter



Fig. 9: Muhamet Fico House, Varosh Quarter



Fig. 8: Lolomani House, Palorto Quarter

Second Category Houses in the Historic (Core) Zone



Fig. 10: Çene House, Bazaar



Fig. 11: Laboviti House, Varosh Quarter



Fig. 12: Unnamed House, Palorto Quarter



Fig. 13: Kindergarden, Palorto Quarter



Fig. 14: Unnamed House, Palorto Quarter



Fig. 15: Kamberi House, Pazar i Vjetër Quarter



Fig. 16: Karalliu House, Pazar i Vjetër Quarter



Fig. 17: Mezini and Lolomani Houses, Pazar i Vjetër Quarter



Fig. 18: Hoxha House, Dunavat Quarter



Fig. 19: Selfo House, Dunavat Quarter



Fig. 20: Dalipi-Konomi House, Dunavat Quarter



Fig. 21: Çoçoli House, Manalat Quarter

Second Category Houses in the Buffer Zone



Fig. 22: Alimate House, Hazmurat - 11 Janari Quarter



Fig. 23: Tolica House, Varosh Quarter



Fig. 24: Kale House, Pazar i Vjetër Quarter



Fig. 25: Çami House, Manalat Quarter



Fig. 26: Gorica House, Manalat Quarter



Fig. 27: Unnamed House, Manalat Quarter

Diyarbakir: First Destroyed and then Commercialized by Turkey's Government

Ercan Ayboğa, Platform "No to the Destruction of Sur"

The World Heritage Site of Diyarbakir consists of an old fortress and the adjacent Hevsel Gardens which lie between the fortress and the Tigris River. Its soul is the vital old city, called Sur or Suriçi, which is a buffer zone. With a past of 4,000 years, the multi-cultural fortified old city hosts 600 cultural Eastern and Western cultural monuments. The strong civil society had a crucial role in the successful World Heritage nomination.

areas government teams destroyed systematically even undamaged buildings, including cultural monuments, using heavy equipment. In East Sur, demolitions continued until summer 2017. Debris has been continuously excavated so quickly and roughly to different deposit sites that not any serious efforts could be made to rescue any authentic elements of monuments from the debris.

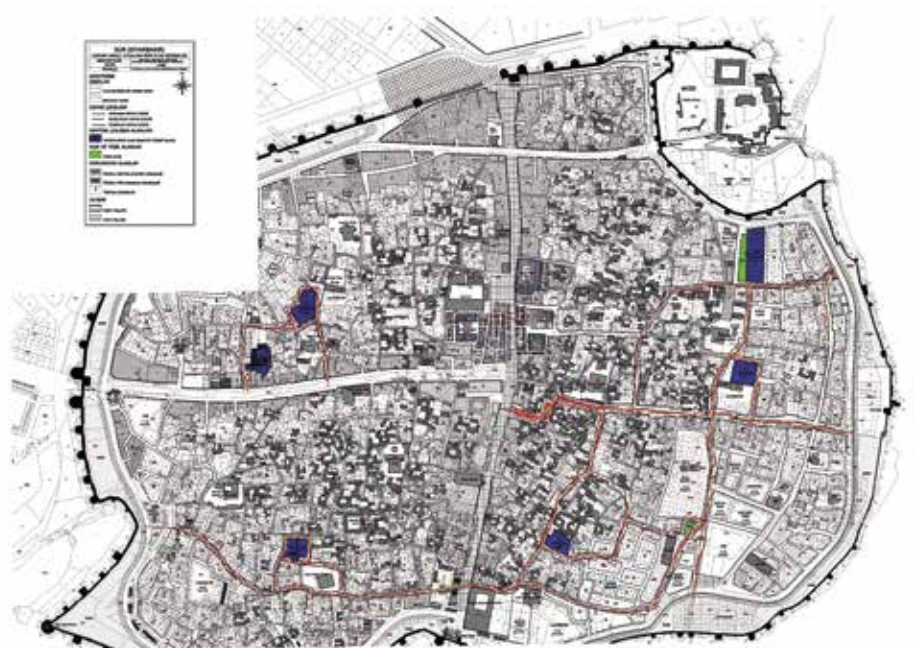


Fig. 1: Revised Sur Urban Conservation Plan.

Map: Platform "No to the Destruction of Sur"

After the end of 2,5 years of peace negotiations between the Turkish government and the Kurdish opposition, in summer 2015 the civil war resumed and reached also Diyarbakir city. The state declared several 24 hour blockades on Suriçi in fall 2015. With the use of heavy weapons like tanks, the last curfew started on 11th Dec. 2015 – and continues today. The armed conflict ended officially on March 10, 2016, and led to the death of some hundred people. During the armed conflict in East Sur (6 neighborhoods), 450 buildings have been largely destroyed. The fortress suffered some damage as a result of being used by the Turkish military.

The main physical destruction in Sur, however, has happened after the official end of security operations. In the blockaded

Parallel to the ongoing destruction the Turkish government issued an expropriation order of the whole old city on March 21, 2016. This decision aims to transfer even old mosques and churches to the property of the government. Over 600 families from the destroyed East Sur filed suit against this enforced expropriation, which foresees very low compensation amounts. All complaints have been refused by the court while there are already 30 cases at the Constitutional Court. The government gave only a small financial rent aid to the displaced people; but even this has been stopped in summer 2018.

After all municipalities in Diyarbakir city – all in opposition to the central government – have been taken over by a state-appointed commissioner in fall of 2016, and the co-mayors have been arrested, the Urban Conservation Plan of Sur (dated 2012) has been revised immediately in order to create a legal basis for the ongoing destruction. The revision argues also with a governmental "Law on the transformation of risky areas" (numbered 6306¹) from 2012 which considers Sur as a risky housing area. In the security-led revision, for instance, schools have been turned into police stations, but no alternative educational areas have been determined. Most streets – remaining from Roman times – have been widened so much that military vehicles can pass. The Turkish Chamber of Engineers and Architects (TTMOB) filed

1 See original law: <http://www.mevzuat.gov.tr/MevzuatMetin/1.5.6306.pdf>

suit against this planned revision and the expropriation of Sur. As during the lawsuit it became clear that the government has no legal basis for its acts, very soon the 2012 law was changed to serve the government's interest.

In the end of 2016 the government formed a „scientific commission“ of uncritical experts who justified the ongoing state destruction. Its main argument is that due to explosives alleged placed in the buildings of the contested area, East Sur had to be erased.

In May 2017 the Turkish government has started the complete destruction of the two neighborhoods of Lalebey and Ali Pasha in Southwest Sur where no armed clashes have happened. After months of protests by inhabitants and civil society, the houses of thousands of people were demolished in the heavy presence of police. The official justification for this is a rehabilitation project from 2011 which, however, the responsible municipalities had nullified in 2013.

Satellite images from May 2016, August 2016 and July 2017 show the progressive destruction of buildings and areas in Sur. While in East Sur the number of completely destroyed and subsequently erased buildings was 832 (10,7 hectares) in May 2016, this number raised to 1,519 (20,3 ha.) in August 2016 and to 3,569 in July 2017, equalling an erased area of 46,3 ha. If we add 806 destroyed buildings from Southwest Sur, a total of 4,376 buildings have been destroyed (58 hectares), representing 40% of Sur's surface and the former home to approx. 23.000 people.

Altogether 170 monuments, i.e. architecturally registered civil and public buildings, have been destroyed or damaged in Sur according to the satellite photo dated August 2016. In detail, 89 monuments have been destroyed completely and 40 partially; 41 monuments have been damaged. Of these 170 registered structures, 13 are public monuments.

One of the destroyed monuments was located in the citadel which is part of the inscribed World Heritage property. After its conservation status had been abolished as a result of governmental pressure, it was destroyed in 2017 in order to build a park. For that also excavations of two meters depth have been done – an act violating the World Heritage Site Management Plan. The population has left this area in 2012/2013 in order to make room for excavations underground where antique monuments, including a Roman amphitheatre, had been detected.

In spring 2017, the construction of 60 new buildings was started in the erased East Sur. In the end of 2017 construction started in Southwest Sur – 200 buildings are now completed. They are all built by reinforced concrete, with no typical courtyards and in big distance to each other which is a strong violation of the historical old city fabric and the design of traditional Diyarbakir houses. The revised and extremely weakened Urban



Fig. 2: Air photo of East Sur after destruction, July 2017

Photo: Platform "No to the Destruction of Sur"

Conservation Plan opens the door for such new constructions. The mainly poor former inhabitants of Sur are not able to buy them from their expropriation compensation and thus will be unable to move back to their neighborhoods. A complete change of Sur's demographic structure is inevitable.

For the new housing projects the government is building basements and new pipes for water, waste water and electricity, which required excavations of up to three meters. As this is an antique settlement area, and in Diyarbakir the houses didn't use to have basements, this work is destroying the widespread archaeological layers under the ground. These constructions are absolutely not necessary: Sur had no serious challenges with water and electricity supply since 2002 when the municipalities carefully improved infrastructures.

Parallel to this work, in 2018 a double track road has been constructed along the fortress in East Sur which has not even been included in the revised Urban Conservation Plan.

The destruction of the World Heritage in Diyarbakir 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 cancelled during the UNESCO nomination process in the beginning of 2015 – actually a precondition for the inscription. It has started also to canalize the bed of the river. The



Fig. 3 and 4: New buildings in Southwest Sur, April 2018
Photos: Platform "No to the Destruction of Sur"

existing large sand quarry pond in the river plain is allowed to be operated by a company – the legal status of this pond has been questionable for years. The largely natural ecosystem of the suburban river stretch has been destroyed completely in the buffer zone. Because of a complaint by the Chamber of Engineers and Architects, the planned canalization of the river course as the boundary of the Hevsel Gardens – inscribed WH property – could be stopped temporarily.



Fig. 5: 3-meter deep trenches in East Sur, spring 2018

While in 2017 the government has constructed some buildings in the uninhabited buffer zone within the Tigris Valley, this approach changed in 2018 dramatically and foresees wide-

spread commercial locations. As local elections are approaching (planned for March 31, 2019) the state-appointed governor of Sur declared recently his intention to create a 15 ha "peoples garden" in the higher parts of the Hevsel Gardens along the fortress. Dozens of houses of people have already been destroyed, and at least hundreds of trees have been cut in the end of 2018. As far as the governor shared with the public, two passages are planned to be created from the old city through the fortress walls, which would mean the physical destruction of World Heritage property! The operation of this "peoples garden" with luxurious gastronomy is planned by private companies, which increases the risks for the WH fortress and Hevsel Gardens.



Fig. 6: Canalization of the Tigris River, April 2018. Photo: Platform "No to the Destruction of Sur"

As a part of the governmental commercialization policy, the destruction of the two adjacent neighborhoods of Feritköşk and Dicle with their 9,000 inhabitants and situated northwards in the buffer zone of the Tigris Valley is planned. In August 2017 they have been declared "risk areas". The aimed "urban transformation" is justified with poor construction conditions which is partly true. As this area is of interest for investments, the planned new buildings will be sold expensively, and thus the current inhabitants, mostly poor, will not be able to return.

It can be concluded that unfortunately there is no effort for any rehabilitation of Sur according to the ICOMOS/WHC guidelines, or any participation of civil society and affected local people. It needs to be stated that in almost half of Sur, apart from the destroyed buildings, the original street fabric and the insular-parcel integrity have been irreparably lost. Together with the forced exodus and forced expropriation it leads to the eradication of the traditional social life, trade forms and urban memory developed over thousands of years, a change of propriety, change of the demographic structure and interruption of the cultural continuity. The ongoing „Tigris Valley Project“ is another big threat to the Diyarbakir World Heritage outside the fortress which should not be underestimated. If all plans of the Turkish government will be implemented, the World Heritage

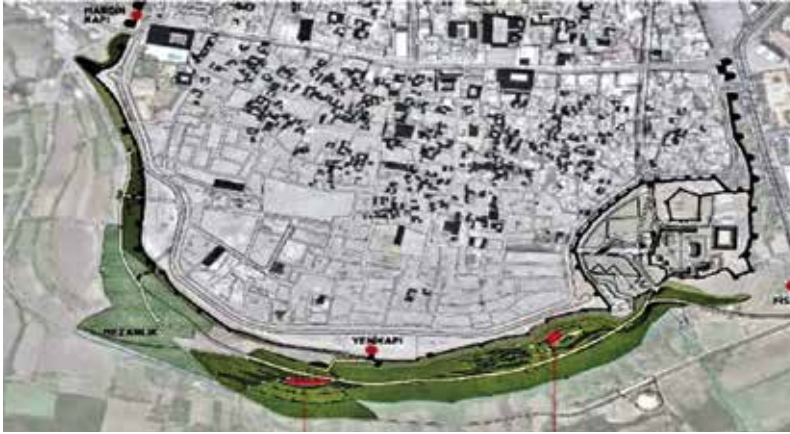


Fig. 7: Plan of the "peoples garden".

Map: Governor's Office of Diyarbakir

of Diyarbakir will lose completely its core values and uniqueness. The result will be a new old city with a completely new population which has no relation to the cultural heritage of Diyarbakir, and a big commercialized area serving only for big investments and profit, and neglecting culture.



Fig. 8: Construction works for the "people's garden", end of 2018.

Photo: Platform "No to the Destruction of Sur"

Requests from the UNESCO World Heritage Committee

We request from the UNESCO WHC to take the following decisions at its 43rd Session:

1. The WHC should make every effort to have the UN security ban over Diyarbakir lifted in order to send a Reactive Monitoring Mission to Diyarbakir without further delay. There is absolutely no security concern in Diyarbakir city as claimed by the Turkish government. This mission should meet also (non-)displaced people from Sur and all civil society organizations working on Sur.
2. The WHC should urge the Turkish State Party to stop immediately all activities in the World Heritage Property and 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, the revived „Tigris Valley Project“ and the „Peoples Garden Project“ until they have been assessed and approved by the Committee.

3. The WHC should urge the Turkish State Party to cancel its decision to expropriate 82% of Sur, dated on March 21, 2016, and the revision of the Urban Conservation Plan, dated on December 2016.
4. The WHC should request from the Turkish State Party that all further assessments, documentation and urban design planning have to be done with the direct participation of affected people, civil society (chamber of architects/engineers, unions, human rights organizations, cultural associations etc.) and independent scientists from different fields in an open and participative process, and with the WH Centre / ICOMOS in a consulting capacity.

5. The destroyed parts of Sur should be reconstructed according to the original Urban Conservation Plan (2012) and the WH Site Management Plan with a strong participation by civil society and inhabitants of Sur, including the displaced ones. The latter should be able to return to their former neighborhoods with the financial support of the state and build new homes according to their needs and oriented at the traditional urban design of Diyarbakir.
6. In view of ongoing massive destruction, well documented by photos and plans, the WHC should inscribe the Diyarbakir Fortress and Hevsel Gardens Cultural Landscape in the List of World Heritage in Danger; following the example of the destruction of the Historic Center of Shakhristabyz/Uzbekistan.



Fig. 9: The marked area is the Southwest of Sur which has been destroyed in 2017.

Photo: Platform "No to the Destruction of Sur"

7. The WHC should urge the UNESCO Director-General to invoke the UN Security Council over the case of Diyarbakir based on UN Security Council Resolution 2347 (March 2017) on destruction and smuggling of cultural heritage.

The Historic Bazaar Complex of Tabriz, Iran

Ghazal Nouri and Ali Bashash Alanagh



Fig. 1: The inscribed property and buffer zone.

Map: Iranian Cultural Heritage, Handicrafts and Tourism Organization. Source: https://whc.unesco.org/en/list/1346/multiple=1&unique_number=1681

The Historic Bazaar Complex of Tabriz was one of the most important commercial centers on the northern route of the part of the Silk Road which passes through Iran. Its shops offer certain commodities such as Persian carpets, metalwork, clothing, jewelry, traditional spices, herbal remedies, natural perfumes, blacksmith and coppersmith works, tobacco, clothing, leather shoes and scarce nuts, which make visitors feel enthusiastic for shopping. In the bazaar's back alleys and closed doors there is however more to discover than what appears at first sight. Interestingly, the bazaar not only has a commercial function but a social and religious one, too. This mesmerizing place consists of countless shops, over 20 caravanserais, inns, vast domed halls, bathhouses and mosques, as well as other brick structures and enclosed spaces for different functions.

The bazaar has been well-known and prosperous since the 13th century. Although the city lost its status as the capital in the 16th century, it remained important as a commercial hub until the end of the 18th century, with the expansion of Ottoman era. It is still one of the most complete examples of the traditional commercial and cultural system of Iran. Apart from its economic status, the Tabriz Bazaar has also been a hub of social and political developments in Iranian history, including the Iranian Constitutional Revolution in the beginning of the 20th century and the Islamic Revolution in 1979. Merchants hold different religious ceremonies and assemblies at the venue. The iconic complex still continues to wield influence over different

cultural, social, economic and political arenas in Iran. It is considered an outstanding example for the coexistence of diverse cultures and a model for constructive interaction among different social strata.

In 2010, the Tabriz Historical Bazaar Complex was included in the UNESCO World Heritage List under criteria ii, iii and iv. Although this bazaar, as compared to the others, takes more advantages due to its integrated social and structural system, the ongoing changes imposed by people could be a serious threat to the world heritage site's outstanding universal values (Fig. 1)

Today, the bazaar and Blue mosque are facing the following challenges:

1. On the one hand, since a bazaar is a common place for trading and communication of merchants, clients, workers and tourists, its lifecycle is directly associated with the network mentioned. Its Outstanding Universal Value was described as "a series of interconnected, covered brick structures, buildings, and enclosed spaces for a variety of functions - commercial and trade-related activities, social gatherings, educational and religious practices". Closely interwoven with the architectural fabric, on the other hand, is the social and professional organization of the Bazaar, which has allowed it to function over the centuries and has made it a single integrated entity.

Unfortunately, today most activities which are related to the atmosphere of the bazaar have disappeared. There is no possibility to provide raw materials needed to produce local products. Many shops have closed, many people have



Fig. 2

Photo: Ghazal Nouri



Fig. 3 and 4

lost their jobs, and traders fail to do business due to the sanctions (Fig. 2). The sanctions have caused a fall of the country's revenues, the devaluation of the national currency, and have increased an inflation on insurance. Therefore, the Tabriz Bazaar cannot play its significant role in the financial system of Iran as it did before.

Shops in the bazaar being inactive is an issue which touches the functionality of the WH site and has caused a direct threat for criteria (ii) & (iii) for this WHS (Fig. 3, 4). On the other hand, the sanctions also affect the tourism industry due to the fact that visiting WH sites is a part, if not all, of itineraries. The sanctions prevent the development of infrastructure for suitable and low-cost services for tourists. Moreover, it should be noted that the irreparable impact of the sanctions would reduce the value of some WHS in Iran.

2. Despite the bazaar's age, some parts feel quite modern and not as atmospheric as a traditional historic place. The view of the Blue mosque has been concealed behind new mod-



Fig. 5 and 6

Photos: Ghazal Nouri



Photos: Ghazal Nouri

ern construction structures. As principles for conservation, restoration, renovation, and good design for new buildings in the areas close to the bazaar should be applied. New buildings around the buffer zone (a new sport market beside the Blue mosque and bazaar!!), could threaten criterion iv (Fig. 5, 6).

Additionally, some historical and conventional brick Hojreh (shops) have been converted to modern stores by using modern elements such as iron doors & windows, advertising boards, air conditioners and open electric cables. It seems that there isn't any strict control for giving construction permissions in the nominated property and buffer zone to reduce threats from inappropriate building development. The aforementioned changes might be fascinating for some customers, the harmony of cultural space of the bazaar and its traditional roots and structures however may go to wane (Fig. 7)



Fig. 7

Photos: Ghazal Nouri

3. The Tabriz Historic Bazaar as one of the most complete socio-cultural and commercial complexes creates an favourite space for advertising. Unfortunately, a lack of management of the property allows destructive anthropogenic environmental influences. Out of ignorance of both tourists and local citizens about protecting the World Heritage, visitors engrave and stick stickers on the body of monuments. This has become a common phenomenon because stickers can now be seen on every part of the property (Fig. 8).
4. Moreover, a lack of places to provide information to tourists, and a shortage of WC for visitors are examples of inadequate infrastructure which threaten the development and implementation of sustainable tourism programs.

Suggestions

It is crystal clear that in order to facilitate the protection process, it is necessary to provide a profound understanding of the authentic character of the Bazaar which has developed based on social, economic and political values and has served both commercial and public functions. The root and nature of its values, and perceptions and interests of people involved with it, have evolved in the course of time.

Regarding the way in which changes have affected the stakeholders and the power balance among them, it can be said that, before the 19th century when the government became the main and central decision-maker for all aspects of social life, four key stakeholders used to be involved in the ongoing life in the Bazaar and in decision-making for its development; the Bazaari (shop owners), the government, the religious authorities and the local people.

After the political modernization, the traditional power balance among the stakeholders experienced an intense change. Today, groups involved with the Bazaar are more various in number and more diverse in terms of their perceptions on, and interest in, the Bazaar. But according to anthropological studies conducted in the Bazaar, in the contemporary decision-making system the most powerful stakeholder is the government and the least influential groups are the public and local people.

Since the Bazaar is a public place owned by individuals and different organizations, a sound and timely reaction to the change in needs and values associated with it could only be made by a management and decision-making system based on transparent negotiation and participation of all stakeholders for the common interest. Adopting the following strategies could certainly assist world heritage preservation authorities to move towards a context-oriented sustainable protection system for the

Tabriz Bazaar, Blue mosque and other objects in the World Heritage property:

- Use the traditional social framework as the main management tool for sustainable protection;
- Have regular negotiations with reputable Bazaari who are trusted among other groups in the Bazaar;
- Build capacities in education and promotion of the young generation working in the Bazaar. (Mostly being relatives and sons of Bazaaris, these youngsters are the future owners of commercial places in the Bazaar.)
- Include the management plan of the Bazaar in the city's master plan;
- Reevaluate the existing legal protection tools in order to optimize them based on our knowledge about the nature of new factors threatening the outstanding universal values of the property, and opinions of all stakeholders to ensure that:
 - a) All stakeholders have equal opportunity to (emotionally, intellectually or financially) use and enjoy the Bazaar as a public property;
 - b) The Tabriz Bazaar is an integrated and active part of the built and social environment surrounding it;
 - c) Its contemporary functions do not damage the material and intangible heritage;
- Facilitate an international mediation process to protect activities related to the world heritage and strongly advocate special rules irrespective of the territory on which world heritages are located.
- Authorities should try to have regular observations on the long-term vision for the nominated property in the management plan, maintain the traditional view of the space, and ensure strict control over the building permits in the WH property and buffer zone in order to reduce threats from inappropriate development.
- It would be better that authorities prepare and implement training programs for their technical staff in order to increase an understanding of shared conservation principles and international standards among the Bazaar community, professionals, workers, local merchants.
- Monitoring of the site should be extended to include the contributions of civil society, tourists and visitors' awareness about the protection of World Heritage should be increased, and free public workshops about the importance of World Heritage sites should be held. We believe that civil society and local communities have an essential role to play in the preservation of cultural heritage. Therefore, we request UNESCO and the Iran government to collaborate with civil society in full transparency.
- Last but not least, it would be better to provide more facilities for disabled tourists in the reorganization of WH sites.

We hope that our initiative will help to establish a regular dialogue, thus allowing the World Heritage Committee to fully benefit from the expertise and passion of local communities and citizens regarding the Tabriz Historic Bazaar Complex which is a most important international place for commercial and cultural interchange.



Fig. 8

Photos: Ghazal Nouri

Meidan-e Emam, Esfahan, Iran

Ali Bashash Alanagh and Ghazal Nouri

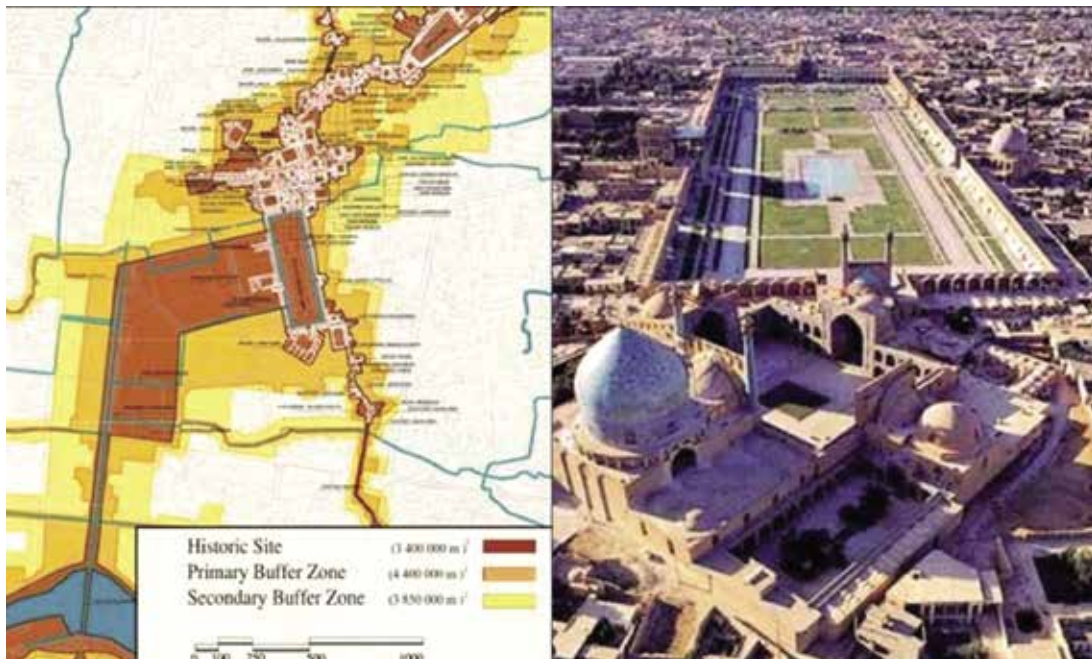


Fig. 1: Naghsh-e Jahan Square, or Meidan-e Emam, Esfahan

Serving as a capital at various times in Iran's long history, Esfahan now is the third biggest city in Iran and one of its most culturally important. Esfahan is known for its outstanding universal architecture and breathtaking UNESCO World Heritage site. It includes a great variety of structures: two mosques, a palace and a bazaar which constitute a historic city center, cultural landscape and archaeological site.

Four centuries ago, Naghsh-e Jahan ("Image of the World") Square (Meidan-e Emam) was the economic and political heart of a prosperous and largely peaceful empire that drew foreigners from around the world. Unlike vast concrete spaces such as Tiananmen Square in Beijing or Red Square in Moscow, Meidan-e Emam served alternatively and sometimes simultaneously as a marketplace, polo field, social meeting point, execution ground and festival park (Fig. 1). In 1979, Meidan-e Emam was included in UNESCO's World Heritage List, meeting criteria i, v and vi (Fig. 2).

After about 40 years, UNESCO issued its requests through Decision 41 COM 7B.87 which are as follows: "Reiterates its request to the state party to submit to the World Heritage Centre the draft conservation and management plan prior to its finalization, for review by the advisory bodies, to carry out an assessment of the property's vulnerability to disasters such as earthquakes

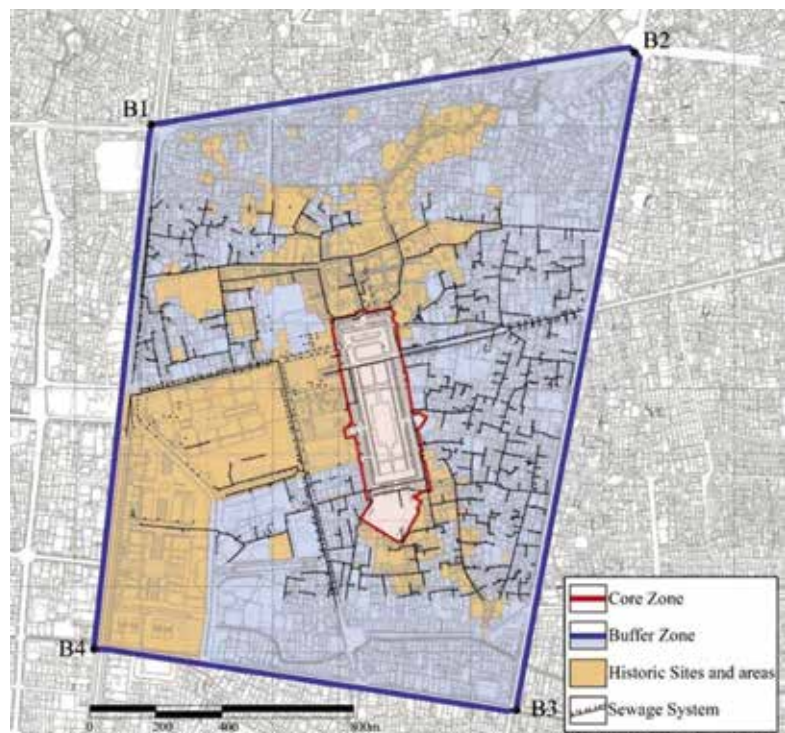


Fig. 2: Core and Buffer Zone of Meidan Emam Esfahan.

Source: Islamic Republic of Iran. State of Conservation Report, Meidan Emam, Esfahan. Tehran 2018

or fires, and to develop a systematic strategy for disaster risk reduction and integrate it into the conservation and management plan.

Also requests the state party to submit to the World Heritage Center, for review by the Advisory Bodies and before any further works: a) Information on the development of the spatial structure for the pedestrian roadways for visitors to the property, b) Detailed information on the reorganization of the sewage system within the property and its buffer zone.

Further requests the state party to submit to the World Heritage Centre, by 1st December 2018, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 43rd session in 2019."

After four decades of being inscribed on the World Heritage List, this public urban square and its bazaar face the following challenges:

1. The sanctions imposed by the U.S. and other countries have a crippling effect on Iran's economy, as well as the World Heritage sites belong to all the people of the world, irrespective of the territory on which they are located. Although this is a political issue and UNESCO may not be involved in these issues, we are concerned about the following aspects:
 - Esfahan Bazaar in Meidan-e Emam square was the heart of the Safavid capital and one of the outstanding commercial centers in Iran to display and sell particular handcrafts. However, due to the increasing inflation and decreasing number of tourists, the bazaar is not serving its main role resulting in a catastrophe which forced most of the traders to close their stores. Having inactive shops in the bazaar is an issue which touches the functionality of the World Heritage site (Fig. 3).



Fig. 3

Photo: Ghazal Nouri

- For conserving the old sewage system that is located in the buffer zone, new pipes, standard conductors and other items are required, some of which are imported products.
2. Executive intervention in the indicated square requires permissions from both the cultural heritage organization and the municipality, which is time consuming. It may cause serious problems in yielding prompt action in unexpected circumstances.

3. The underground water level has been decreasing owing to a lack of rain, climate change and mismanagement in protecting resources. Therefore, historical structures in Meidan-e-Emam grapple with soil settlements and its irreparable effects (Fig. 4).
4. There are a lot of restaurants and hotels in the buffer zone. Oily food waste which enters the sewage system could have a destructive effect on the viscosity and flow of water in the pipes.
5. There are several drinking fountains of unacceptable standard. Water leakage and humidity could have negative effects on the historical buildings (Fig. 5).



Fig. 4



Fig. 5

Photos: Ghazal Nouri

6. Currently, Meidan-e-Emam Square, where once a vast array of precious Iranian handcrafts and artworks were offered, has turned into a park and a shopping center with shoddy Chinese handcrafts and goods (Fig. 6). This situation creates an unpleasant scene for the tourists coming to visit the World Heritage site which is one of Iran's first sites to be in-



Fig. 6

Photo: Ghazal Nouri

scribed on the UNESCO's World Heritage List. Traffic caused by motorbikes in the historic site makes the situation worse (Fig. 7, 8, 9).



Fig. 7

Photo: Ghazal Nouri



Fig. 8+9

Photo: Ghazal Nouri

7. Although some pictograms notify that it is strictly forbidden, both tourists and local citizens engrave and put stickers on the walls of the monuments which lies at the heart of their ignorance (Fig. 10).
8. Lack of places to give information to tourists and shortage of toilets for visitors are examples of inadequate infrastructure which threaten the development and implementation of sustainable tourism programs. Converting some parts of the World Heritage site (Masjed-e Imam) to rest-rooms could also be a wrong step (Fig. 11, 12).
9. The core zone of the World Heritage Property (to be exact, the second story of Aliqapoo palace) is not an appropriate place to be used as a coffee shop or a restaurant (Fig. 13, 14).



Fig. 10

Photo: Ghazal Nouri



Fig. 11+12

Photo: Ghazal Nouri



Fig. 13

Photo: Ghazal Nouri



Fig. 14

Photo: Ghazal Nouri



Fig. 15

Photo: Ghazal Nouri

10. People who work for the conservation of World Heritage Properties should respect Health Safety Environment (HSE) Regulations. They should wear helmets and ensure other safety measures (Fig. 15).

11. Obviously, postponing some steps of restoration can cause serious problems. In this regard, the long-term use of heavy mortar in restoring the site has caused wide cracks in the ceiling and as expected, an irreversible damage is evident (Fig. 16, 17).



Fig. 16

Photo: Ghazal Nouri



Fig. 17

Photo: Ghazal Nouri

12. Parking cars in the Poshte Matbakh Parking lot, in the corner of Masjed-e Emam (Emam Mosque) as well as all other established parking lots may cause harmful effects because of a dynamic load on soil and foundations which bear the weight of the structures (Fig. 18).

13. Although, reorganization of the sewage system has been implemented and significant efforts have been taken to mitigate problems, there is a long way to reach an adequate standard as moisture is still noticeable in different parts of the walls in the site (Fig. 19, 20).

Suggestions:

- World Heritage properties should not fall victim of the competition for policy, war and sanctions.
- Specialist teams from both organizations (cultural heritage organization and municipality) with enough authority should decide and act immediately in emergency conditions to enhance the quality and effectiveness of civil society's contribution in the implementation of the World Heritage Convention.



- Special and engineering measurements should be considered on structural elements, especially soil and foundations because of dynamic loads from parking areas in the buffer zone.
- Serious action should be taken for creating an insulation against the destructive effect of moisture.
- Restaurant owners should prevent oily water and waste through the use of grease extractors. Additionally, the sewage system should be renewed and inspected at regular intervals in all parts of the buffer zone.
- It would be beneficial to hold free workshops about the importance of World Heritage Sites and provide people the knowledge of how they could contribute to their protection.
- Stores should be organized in a way to protect Iranian and domestic arts or handcrafts.
- It would be better if tourists could benefit from updated information about the site online.
- Site restoration should be carried out according to accurate project scheduling.
- Last but not the least, more details should be considered for disabled tourists in reorganization of the World Heritage site.

We hope that our initiative will help to establish regular dialogue, thus allowing the World Heritage Committee to fully benefit from the expertise and passion of local communities, indigenous peoples and citizens who are active in the field of cultural and natural World Heritage.

Fig. 18

Source: Islamic Republic of Iran. State of Conservation Report, Meidan Emam, Esfahan. Tehran 2018



Fig. 19

Photo: Ghazal Nouri



Fig. 20

Photo: Ghazal Nouri

Assessment of the Old City of Ghadames

Lamees BenSaad, Tripolitanian Society

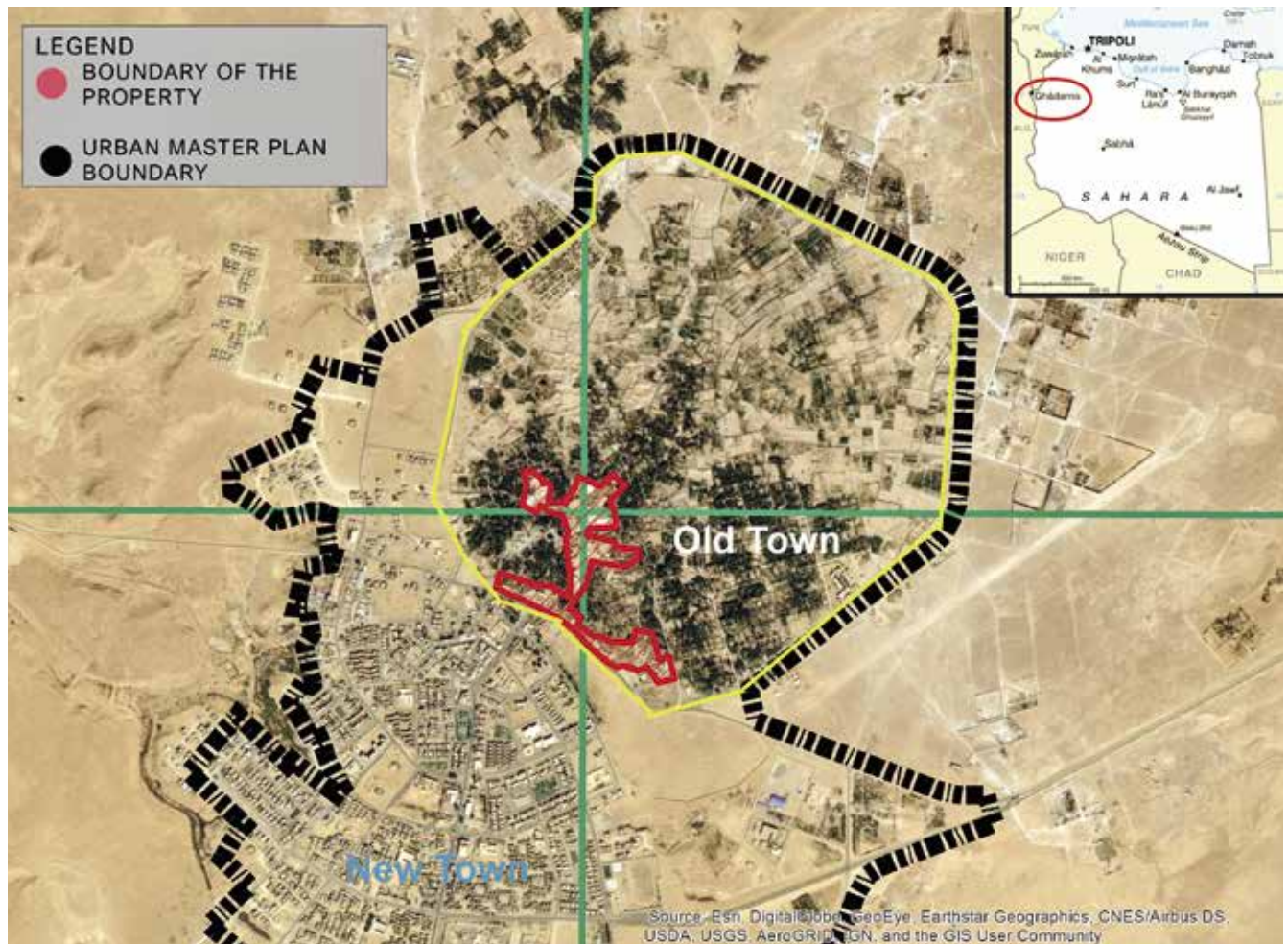


Fig. 1: Ghadames - the Old and New Town, and the inscribed property.

Map: / Andrea Martinez Fernandez

The Old City of Ghadames (OCG) is known as the “the pearl of the desert” and stands in an oasis. It is one of the five official UNESCO cultural heritage sites that Libya has. Additionally it is classified as the third oldest city in the world (United Nations Development Programme and the UNDP Office for Project Services Report, 2007). The OCG is valued by the local people as it provided many with a source of pride as the city held a very sustainable architecture with its building methods. Buildings were connected “wall-to-wall” for insulation and maximum space utilization making the neighborhood one large building.

It has a very sentimental and religious value for the people of Ghadames. Furthermore, during modern times it was a source of income for many. Tourism played an important role in the old city of Ghadames before the political unrest, with many visit-

ors coming from all over the world to attend the Annual Dates Festival.

Old Ghadames is now at a critical point. Years of crisis and economic decline have led to serious outmigration, ensuing neglect and, finally, collapse of historic buildings. If this trend cannot be halted and reversed soon, nobody will be left who would take a serious interest in maintaining and re-inhabiting the town, and it will become a ghost town.

This development was a result first of the lack of modernization in the historic buildings, and then of economic decline due to the crisis. During the years of national crisis, local people were preoccupied with survival, leaving little room for dealing with cultural heritage. Obviously they have been waiting desper-

ately for a situation which would allow them to return to their houses and take their lives into their own hands again.

Tourism, which was a major economic sector before the crisis, can be revitalized only if the city will come back to life, and this depends on the houses being inhabitable. Once this happened, with about 600 buildings in the old town, their maintenance and modernization will remain a continuing necessity and thus an economic sector in itself. Some houses may be turned into accommodations for tourists in the future. The influx of foreigners will then spur the development of other economic sectors such as transportation, food production, handicrafts, culture, and services of all kinds.

The future of Ghadames is under active threat posed mainly by the present turmoil in the country but also by climate change. Depopulation, military conflict, economic stagnation and recent severe weather has led to a marked decline in the condition of buildings, even those subject to major schemes of restoration a decade or so ago. If nothing happens soon, project does not go ahead the city will continue to deteriorate and Libya will have lost 'the pearl of the desert'.

Local people have a great regard for the ancient city, but many have abandoned traditional houses in favour of homes in the growing modern town located in the suburbs of Ghadames. Revitalization must build on sustainable development, using traditional materials and methodologies, utilising the skills of local craftsmen. Our ambition is to encourage a revival in urban living – to bring families, shops and businesses back into the city and support local economic development.

The sustainable driver for change will be to demonstrate that maintenance of the ancient city (by local people with external specialist and financial help) is of benefit to the entire community. If people can be encouraged to return to occupy shops, workshops, houses and markets, then the long-term sustainability of Ghadames is ensured. Without inhabitants, Ghadames is a monument, not a sustainable city. To regain sustainability, Ghadames needs to adapt to change. This may mean the careful adaption of some traditional buildings to accommodate a more modern life-style and to withstand increasingly adverse weather conditions.

Challenges

Due to the political instability and the economic crisis, until recently the Old City of Ghadames was not a safe venue as armed groups and outlaws had surrounded the area. The absence of security has made it difficult for the locals to accommodate and perform their everyday life activities in order and peace, and many of the inhabitants have now abandoned their houses and moved somewhere else. The unattended houses have been left exposed to the elements and are in serious disrepair. Over the years, many of them have acquired structural damages, and

several of them have collapsed during heavy rains last winter. The security situation has also hindered the Department of Antiquities (DoA), the Libyan Authority of Tourism and the civil society organizations to be at the site for monitoring, inspection or evaluation.

There is no administration, and due to outmigration there is a lack of traditional knowledge and technical expertise to repair and maintain the residential heritage buildings that lead to even further damage and destruction of valuable buildings. The years of conflict have brought the economy of Ghadames to an almost total collapse. As a result, neither the DoA nor the Historic Cities Authority, which is nominally in charge of the site, have an operating budget to provide assistance for the restoration of the damaged houses.

In-addition, the lack of expertise and specific conservation guidelines for residential heritage buildings in the Old City of Ghadames resulted in the dilemma in the management of the municipality to preserve the residential heritage buildings.

The level of understanding of the heritage buildings in Libya still remains very low. Without any documentation of the beauty of the residential heritage buildings, it will all be lost due to age and climate change.

Recommendations

The Tripolitanian Society proposes to implement a project which will preserve cultural heritage by restoring and maintaining the old city of Ghadames. The aim should be to assist in the removal of the old city of Ghadames from List of World Heritage in Danger. In addition, the project should focus on a city which will be able to contribute to the economical empowerment of the society. This is very important in the improvement of the economic crisis and lack of liquidity currently ongoing in Libya.

The project must focus on sustainable development, using traditional materials and methodologies, utilising the skills of local craftsmen. Our ambition is to encourage a revival in urban living – to bring families, shops and businesses back into the city and support local economic development. This will promote local tourism and trade, including traditional hand crafts, and cultural festivals.

The project should seek to celebrate the unique qualities of the city by highlighting the chronological depth of the settlement and the many attributes of the standing buildings including fixtures and fittings and ornamentation.

The workshops and interventions will allow the participants to develop an understanding of international standards and the principles of conservation and restoration, to improve the managerial capacities of the municipality and of other state agencies in charge of safeguarding Ghadames.

Training will additionally equip them with the tools and skill-sets they will need in order to monitor restoration projects in the future, to evaluate and assess new projects, and to address management challenges for a given restoration project. The practical demonstrations will help to develop skills among local house owners, craftsmen and workers to restore and maintain heritage buildings in line with conservation requirements.

Request to the Libyan State Party:

1. The most part of the Old City of Ghadames is not included in the boundaries of the inscribed World Heritage property, making it ineligible to benefit from this status and any support provided for the World Heritage. This is very difficult to explain, and possibly unacceptable, to the local population. In cooperation with ICOMOS, the State Party should find a way to include all of the Old City of Ghadames in the inscribed property, even if necessary with a different level of protection.

2. The State Party should increase its efforts to mobilize the funding necessary for the implementation of the project activities described above.

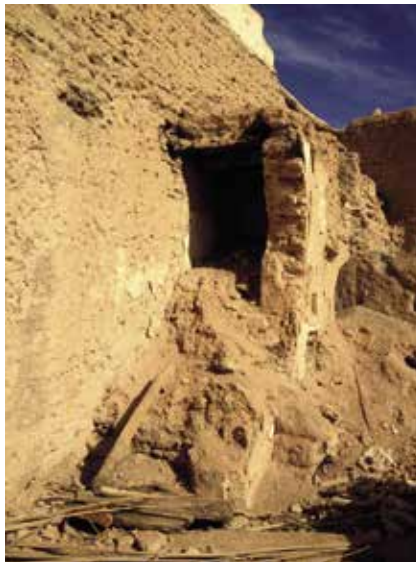
Request to the UNESCO World Heritage Committee:

1. The UNESCO WHC should make strong efforts to overcome security concerns which prevent a Reactive Monitoring Mission from being sent to the Old City of Ghadames.
2. The World Heritage Committee should work with the State Party to develop a management plan for all of the Old City of Ghadames following consultation with national and municipal authorities and the local community.

Photographic Documentation of Damages in the Old City

All photos by Lamees A. BenSaad







Colonial Heritage at Risk: Bissau-Guinea – a Modernist African City

Sofia Cristina Mendonça Gaspar and Maria Isabel da Trindade Ferro

The main objective of this paper is to raise awareness, promote, and disseminate urban colonial heritage that is at risk in the city of Bissau, the capital of Guinea-Bissau since 1941, by integrating the nucleus designated “Bissau Velho” - Old Bissau - in the Tentative List for World Heritage as a cultural site.

Between the end of the Second War and the 1960s, during the Portuguese dictatorial regime, called “Estado Novo”, the Portuguese dictator António Salazar promoted, along with his minister of public works, the physical occupation of overseas territories, following at the time the principles of planning and occupation of the territory defined as territorial Portugal, using metropolitan models.

Like many other regimes on an international scale, there was an architectural “style”, which up to the present day is associated with the regime. In Portugal, for the first time, structuring routes, railways, border posts, post offices, public services and equipment were designed as a way of showing the organizational effectiveness of the regime and always with a construction and style component that characterizes it.

Bissau highlights the structure of the African garden city, which contains a domestic scale, considered a “Green Garden” in the Tropics. Successive residential neighborhoods have boosted the growth that is still visible in the structure of the city today. Successive neighborhoods shaped the city. Examples are, firstly, the set of public employees’ houses (built before 1945), and then the houses built by architect Paulo Cunha in 1946, finally the neighborhood with two-floor houses for the post office staff.

The urban plan designed by engineer José Quinhones for the city of Bissau and implemented in 1919 defines the road structure and location of the main facilities. It is the road that connects the Port zone to the current National Heroes Square, where the Government Palace (bombed in 1998 and rebuilt later), the PAIGC headquarters (African Party for the Independence of Guinea and Cape Verde), the Museum and the headquarters of TAP (Portuguese Air Transport Company) are located. Having been ruined in 1998, the Government Palace was reconstructed, and disfigured in the process by the intervention of Chinese investors, due to a lack of regulation and protection of the building.

The old city of Bissau, or in Portuguese “Bissau Velho”, has a grid structure, with a system of straight streets and the Avenue of the Republic as its main axis (today Avenue “Amílcar Cabral”), and along the avenue are located the main buildings, cathedral, court of law, post office, market and the Bissau International Sports Union. Along with the remarkable development of domestic architecture, Bissau was a paradigmatic example of the urbanization strategies that “Estado Novo” undertook after the end of World War II and in all African cities. Depending on its scale and hierarchy, a set of facilities is implemented which consolidates the idea of modern and urban, like hospitals, schools, sports. An architecture recreational, religious, and representative of political power.

The growth of Bissau reflects the planning and design carried out by the Office of Colonial Urbanization created in 1944 by Marcelo Caetano in his first year as Minister of the Colonies.

In 1951 it was renamed the Office of Urbanization of the Ultramar (GUU). The urban plan of Bissau was replicated in other Guinean agglomerates, proving the effectiveness of the Portuguese occupation of the African territory. Examples are Bolama, Bubaque, Cati, Bufatá, Cacheu, Mansoa, Canchungo, Gabú, Farim, Santo Domingo and Fulacunda.

Aware of the cultural relevance of the country, we express concern with built structures that are largely abandoned and poorly maintained, neglected either by lack of economic means, political stability, victims of bombardment and often of the stigma of the “colonizer” image. *“In the case of Bissau and Guinea it means that we are dealing with an ill-loved and outcasted architecture from the manuals that deal with the extraordinary outbreak of modern-profile architecture in the current African countries that speak Portuguese.”* (Ana Vaz Milheiro 2012)

Buildings are threatened by forgetfulness, lack of resources, and political instability. Some are already demolished such as the Home for Girls in Bissau or the Government House, whose refurbishment decharacterized it, for lack of protection and regulation.

A survey in the Portuguese Information System on Architectural Heritage (SIPA – Sistema de Informação para o Património

Arquitetónico) in Guinea-Bissau includes 33 buildings between the 1940s and early 1970s. This architectural patrimony of various uses such as political and administrative, health, education, commerce, single family residence, or post office was a project of the Colonial Urbanization Office created in Lisbon in 1944.

Today, there is a lack of planning, of a plan that structures the whole intervention and that launches the hypothesis of sustained growth for the city of Bissau and for the country. It should be recalled that despite the classification of the archipelago as a UNESCO Biosphere Reserve, there is still no recognition by international institutions of the places, buildings and monuments of the islands, nor of customs, dances or traditional rituals. To this end, a process of national classification, with rigorous protection and safeguard measures, is urgently needed to promote the recovery of this built complex – which, in addition, has enormous potential for tourist, cultural and social development. The main colonial buildings are present in Bissau, Bolama, Bubaque, Canhabaque, Formosa, Uno, Galinhas and Sogá.

Guinea-Bissau is a country with a rich history, many traditions and a lot of ethnic wealth. However, its political history has not always allowed the safeguarding of its built heritage or guaranteed social peace for a period necessary to develop and implement policies for the conservation, maintenance and enhancement of its Heritage.

The proposal to nominate the old part of the city of Bissau results from the urgency of considering the colonial heritage and the modern African heritage, part of Portugal's and Bissau's history, as an exceptional example of early modernist urbanism in the middle of the 20th century. Its reflection in the African context is relevant for its history, integrated in the modern movement and in the planning of cities and buildings, which reveals – more than 50 years old – an added cultural value marked by its resilience.

It has been designed with great consistency, integrating not only spatial but also climatic principles, principles of passive architecture which today challenge the need for costly systems that compromise the energy sustainability of the latest architectural models.

According to the criteria for the assessment of Outstanding Universal Value, the Bissau architectural ensemble represents a testimony of an important interchange of human values over a span of time or within a cultural area of the world. It is an outstanding example of an architectural or technological ensemble which illustrates a significant stage in human history. The relationship with these two criteria results from the colonial occupation of African countries by Portugal, such as Angola, Mozambique, Sao Tome and Principe, Cape Verde and Guinea Bissau. It is integrated in a wide territorial conquest, represented in its unique architecture of modernist character, with

different characteristics of the architecture that at that time was produced in mainland Portugal.

The study of Bissau represents a unique opportunity for city design, where ethnic issues were combined with the constraints of materials available for building, labor, and the climate of the tropics, which enabled the teams of designers on the ground to foster new and innovative experiences, solutions and architecture. The comparison of colonial architecture with current construction, which does not consider the climatic conditions, materials of the region, local techniques, and the economic and ecological sustainability of buildings, reflects the economic and social ambiguity of the country.

Related to other African modernist cities such as Asmara, the capital of Eritrea, Bissau conveys how colonial planning, based on functional and racial segregation principles, was applied and adapted to the local geographical conditions to achieve symbolic meaning and meet functional requirements.

Bissau for its political instability is not as well preserved but its urban projects represent unique opportunities for the experience of architectural and urban “laboratories” aimed at improving the living conditions of populations (inherent to the principles of the Modern Movement Architecture) regardless of colonial imposition, which will no longer be repeated. Because of this characteristic, they have become remarkable and are catalysts for sustainable change, whether cultural, economic or social. In the annex, we show a map with the location of buildings and photographs, some partially updated according to the visits that were possible.

It is imperative to carry out a historical appropriation and the necessary collective catharsis that is imposed between peoples who were colonizers and colonized, but that today seek together to fairly frame, value and preserve a unique common heritage.

Aware of the efforts, research and work of civil society, NGOs, technicians, professionals and researchers, we have strengthened our interest in Guinea-Bissau's heritage with a focus on inventorying, cataloguing and analyzing the urban architectural and colonial heritage built by the Portuguese government in the colonial territories in the referred periods. The actions to be carried out immediately in order to safeguard this history and heritage are:

- Fora and debates with the local community aiming to create and raise awareness of the importance of safeguarding urban and built heritage (work already initiated by the NGO VatosVerde).
- Up-to-date and detailed survey of existing heritage and its conservation status so that the entire territory is seen as a whole and not in a fragmented way, through a collaboration of the Portuguese government through the General

Direction of Cultural Heritage (DGPC), which manages the Portuguese Information System for Architectural Heritage (SIPA), with the Guinean entities.

- Develop and implement the Safeguard Plan for Bissau, Bijagós and other identified locations, prioritizing the areas and measures to be implemented.
- Develop partnerships with several Guinean and international institutions using publications already made, and the entire scientific and academic community.
- Preserving the historical character of the set, specifying guidelines for its rehabilitation and revitalization of the building, valuing all cultural heritage.
- Promoting the resurgence of local construction techniques and the production of local materials.
- Revitalization and reorganization of public space to attribute new values (cultural, museological, tourism, education, science, art) to buildings and public spaces for the appropriation of the community. As a way of preserving part of Guinean history, growth of collective belonging and as well a way of valuing customary practices, local resources, creation of local employment and social development. A conscious way and without impositions, contrary to the colonialist character of the occupation of the territory, removing the “negative” character of the existing one, thus promoting the correct appropriation of the spaces so that they can be desired and esteemed.

Photographic documentation of Bissau’s modernist architectural heritage

All photos by Sofia Gaspar and Maria Isabel Ferro



Fig. 1: Map of Bissau indicating the ensemble of modernist buildings documented below.

Map: Google Earth / Sofia Gaspar

Legend

1. Courthouse – Conservation: good condition





- 2. Neighborhood for civil servants – Conservation: poor condition
- 3. Residences – Conservation: poor condition
- 4. Monument for the National Heroes – Conservation: medium condition
- 5. Cathedral of Bissau – Conservation: good condition
- 6. Government House – Conservation: adulterated
- 7. Guinea Governor's House – Conservation: good condition (without photo)
- 8. Municipal market – Conservation: demolished after a bombing (without photo)



- 9. Museum and Study Center – Conservation: medium condition
- 10. Stadium – Conservation: poor condition (without photo)
- 11. Professor António José de Sousa School – Conservation: medium condition
- 12. National Hospital Simão Mendes – Conservation: poor condition
- 13. Hospital of 3rd August (without photo) – Conservation: ruins



- 14. Meteorological station – Conservation: medium condition
- 15. Electric Power Plant – Conservation: poor condition



- 16. Postal Service Headquarters – Conservation: medium condition (partially adulterated)





17. Neighborhood for Postal Service officials – Conservation: poor condition
 18. Che Guevara Square – Conservation: adulterated and poor condition
 19. Da Alfândega Square – Conservation: poor condition
 20. Nuno Tristão Monument – Conservation: adulterated and poor condition
 21. Customs house – Conservation: poor condition
 22. Marine Facilities
 23. Workers' Union of Guinea – Conservation: poor condition



24. Lisbon and Bissau Sports Building – Conservation: poor condition
 25. Fire Fighters' Building – Conservation: poor condition
 26. Honório Barreto School – Conservation: poor condition
 27. Dr. Agostinho Neto School – Conservation: poor condition
 28. Alto-Crim School – Conservation: poor condition (partially) with new architectural elements
 29. Head office of the Industry and Commerce Association – Conservation: poor condition



30. Port Authority Building – Conservation: poor condition
 31. TAP Head office – Conservation: poor condition
 32. ANCAR Building – Conservation: medium condition
 33. Tile panel by Augusto Trigo – Conservation: poor condition
 34. UDIB – Conservation: poor condition
 35. Girls Home – Conservation: demolished
 36. Forte Amura – It was not possible to visit and take photos - Militar Instalations – Conservation: poor condition
 37. Old Town



Multiple Dangers to Lamu Old Town

Mohamed Athman Bakar, Save Lamu



Fig. 1: Lamu Old Town is threatened by culturally and environmentally destructive development, including one of Africa's largest proposed infrastructure projects that includes a mega-port and a coal-fired power plant that will produce a mountain of toxic waste.

Photo © Getty Images

Inhabited continuously for over 700 years, Lamu Old Town in Kenya is the oldest and best-preserved example of a Swahili settlement in East Africa. In 2001, it became a cultural World Heritage site based on three criteria of Outstanding Universal Value (OUV). First, the architecture and urban structure of Lamu graphically demonstrates how cultural influences were integrated from Europe, Arabia, and India over hundreds of years, utilizing traditional Swahili techniques to produce a distinct culture.¹ As described in the site's UNESCO listing, "[t]he buildings are well preserved and carry a long history that represents the development of Swahili building technology, based on coral, lime and mangrove poles." The second and third aspects of OUV relate to the town's embodiment of regional history and its role as a religious, cultural, and educational center.

¹ <https://whc.unesco.org/en/list/1055>

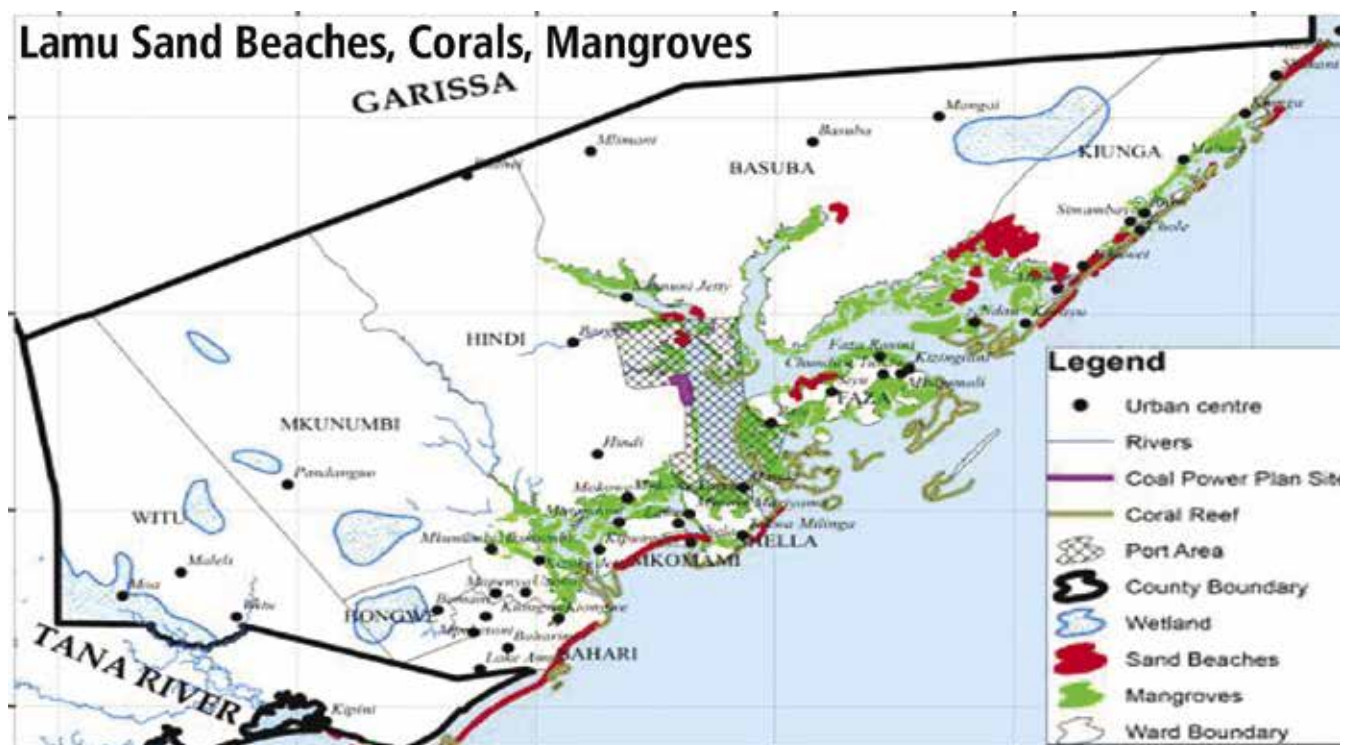


Fig. 2: Ecosystems of Lamu County and the Port Area with the site of the planned Coal-fired power plant.

Map provided by Save Lamu

How do LAPSET and the Lamu coal-fired power plant threaten Lamu Old Town?

According to the January 2018 Reactive Monitoring Mission by ICOMOS, ICCROM, and the World Heritage Centre: Most recently, the property is threatened by a large-scale industrial and infrastructural development referred to as LAPSET, which includes a wide range of components: Lamu Port, railway lines and roads network, a highway, a crude oil pipeline, an oil refinery, resort cities, airports and all the necessary support infrastructure for metropolis development. This is considered to be the largest such investment on the African continent. This development has further increased the level of the potential impact on the morphology of the coastline, tidal flows, and on the formation of sandbanks over a wide coastal area, as well as on the socio-economic development of Lamu and its surrounding landscape.²



Fig. 3: Lamu Port under construction.

Photo provided by Save Lamu

The mission report includes a three-page list of many severe potential impacts of the proposed Lamu Port – South Sudan – Ethiopia Transport Corridor (LAPSET) on the OUV of the property. Regarding Amu Power's Lamu Coal Plant, the mission "was led to understand that the proposed power station is currently facing a legal challenge (for this reason, there was a reluctance by the State Party to discuss it with the mission)." Nevertheless, the mission noted the potential impacts of the power plant include "specific impact on the coral stone buildings of Lamu Old Town as the rather fragile limestone can be impacted by air pollution"; "extensive dredging and mangrove loss to allow large coal-carrying ships access to the power station; discharge of cooling water into Manda Bay leading to loss of fish and coral in the bay; airborne pollution affecting air quality at the property and damaging the coral buildings in the property; and visibility of the 210 m tall power station chimneys from the World Heritage property."

Due perhaps to the lack of information on the Lamu Power Plant, we note that the mission report failed to mention critical issues such as cultural destruction of local hunter-gathering communities, or the devastating risks of the coal plant dumping toxic coal ash next to Manda Bay in a mountain 1.2 km long, 1 km wide, and over 25 m tall. The ash dump will be full in 15 years, just half of the plant's 30 years of expected operation.³ **With a liner virtually guaranteed to leak into the precious potable groundwater supply of Lamu County, the ash dump will leach extremely dangerous quantities of heavy metals, including mercury, lead, selenium, and arsenic.** These metals will also flush into the Bay during tidal surges, frequent floods and storms, and sea level rise.⁴ These heavy metals accumulate in the aquatic food chain and destroy fisheries.⁵

We urge the Committee to remind the State Party that development plans around World Heritage sites are frequently under litigation, and ongoing court cases cannot be used as an excuse to reduce transparency with Reactive Monitoring Missions. (In the case of Lamu Port, community litigation has been ongoing since 2012, yet the Reactive Monitoring Mission was able to conduct assessments in 2015 and 2018.)

Regardless of ongoing court cases, an urgent monitoring mission — even if not allowed to visit the property for security reasons — should review the independent expert assessments of likely cultural and environmental impacts of the Lamu Coal Power Plant, available at <http://www.savelamu.org/multimedia/documents/>.

The Committee must strengthen its recommendations to protect Lamu Old Town

At its 2018 meeting Bahrain (42 COM), the World Heritage Committee "reiterate[d] its concern that the scope of the LAPSET project may continue to have significant impacts on the Outstanding Universal Value of the property" and issued and adopted seven requests of the State Party. Delegates of Uganda, Tanzania, Zimbabwe, and Norway commented on the importance of protecting Swahili cultural heritage and mitigating the impacts of LAPSET and the coal power plant.⁶ In **42 COM 7B.45.6**, the Committee "requested the State Party to revise the draft Strategic Environmental Assessment (SEA) of the

² WHC.18/42.COM/ Report of the World Heritage Centre/ICOMOS/ICCROM Advisory mission to Nairobi concerning Lamu Old Town, Kenya, 24 to 26 January 2018, <http://whc.unesco.org/en/documents/167872>, at 9.

³ Amu Power, ESIA Study for the 1,050MW Coal Fired Power Plant, Lamu, Kenya, Description of the Project (2016) at 20. See also Amu Power, ESIA Executive Summary at 12-13, <http://www.decoalize.org/wp-content/uploads/2017/02/01ExecutiveSummary.unlocked.pdf>.

⁴ Amu Power, ESIA Executive Summary at 12-13; <https://theconversation.com/the-environmental-impact-of-a-coal-plant-on-kenyas-coast-is-being-underplayed-84207>; For coastal inundation maps of the Lamu region, see <https://choices.climatecentral.org/#11/-2.1580/40.9285?compare=temperatures&carbon-end-yr=2100&scenario-a=warming-4&scenario-b=warming-2>.

⁵ See, e.g., D. Lemly & J. Skorupa, Wildlife and the coal waste policy debate: proposed rules for coal waste disposal ignore lessons from 45 years of wildlife poisoning, *Environ Sci Technol* 46 (16) (2012), <https://www.ncbi.nlm.nih.gov/pubmed/22839645>.

⁶ <http://whc.unesco.org/en/sessions/42com/records/?day=2018-06-28> starting at 1 hour, 28 minutes.

entire LAPSSET project to include a chapter on the impacts and proposed mitigation measures for cultural and natural heritage, and specifically the impacts on the OUV of Lamu Old Town.”

The Strategic Environmental Assessment (SEA) for LAPSSET and its associated components is incomplete, making the ESIA for the Coal Plant and all LAPSSET associated projects, “procedurally infirm”, according to Kenya’s High Court.⁷

We call upon the Committee to request completion of a thorough and credible SEA that includes an assessment of the separate and cumulative impacts of LAPSSET and the Lamu Coal Plant, particularly disposal of toxic coal ash. The SEA must include credible public participation. Because environmental destruction of crucial water catchments, small farms, fisheries, mangroves, and coral reefs has already begun, a moratorium on construction of all aspects of LAPSSET, especially the Lamu Coal Plant, the Kwasasi road, and the Lamu-Garissa road projects must be adopted until a credible SEA is completed and reviewed by the Committee.

In **42 COM 7b.45.7**, the Committee “also requested the State Party to submit to the World Heritage Centre drafts of the revised Master Plan for the Lamu Metropolis, the EU transportation infrastructure plan, the LAPSSET Planning and Investment Framework, and the revised chapter on LAPSSET of the Management Plan for the property, for review by the Advisory Bodies as soon as they are completed and before they are approved.”

We call upon the Committee to reiterate this recommendation in 2019. It is imperative that these plans become publicly available for civil society to review and comment upon. Without transparency and participation, the Swahili communities that make up Lamu Old Town and its wider setting will continue to be marginalized and disproportionately impacted by culturally inappropriate and environmentally devastating development.

In **42 COM 7B.45.8**, the Committee “took note of the commitment of the State Party not to allow LAPSSET developments on the islands of the Lamu Archipelago, but considering that there could be a spillover effect from other development related to LAPSSET, further requested the State Party to: 1) Develop necessary planning measures and development controls (including restrictions on height, building materials, land use and use of HIAs [Heritage Impact Assessments]), to ensure that any spillover developments in the setting of the property do not have a negative impact on its OUV, and 2) As a matter of urgency, and as requested in a number of previous Committee decisions, submit a proposal for a Minor Boundary Modification to the World Heritage Centre which sets out the extent of a revised buffer zone around the property including at a minimum all of

Lamu Island, the parts of Manda Island visible from the property, and the larger mangrove areas.”

We note that the Committee’s Operational Guidelines recognize the need to protect World Heritage sites from incompatible activities beyond their boundaries and specifically recommend the establishment of buffer zones around protected areas in which certain activities are restricted in order to afford an added layer of protection to the World Heritage Site.⁸ However, at the Committee’s discussion at 42 COM, the State Party commented that it would delay establishing an effective buffer zone until the next monitoring mission of the Advisory Bodies, when the boundaries could be negotiated on site.⁹

We would find such a buffer zone determination process unacceptable if it did not guarantee transparency and public participation from affected communities, particularly poor people whose livelihoods rely on healthy artisanal fisheries, mangrove forests, and coral reefs in the wider setting of the World Heritage site. We are also alarmed that groundwater supplies to Lamu Old Town are being siphoned and depleted by irresponsible development, and we note the urgency of buffer zones to prevent a permanent shortage of freshwater for the town.

42 COM 7B.45.8.3 requested the State Party to “carry out additional studies to ascertain any effects that the pollution resulting from the coal-fired power plant may have on the fragile coral stone buildings of the Old Town and any other impacts on other attributes that carry the OUV of the property.”

As the State Party of Kenya has not yet carried out thorough and credible studies of the Lamu Coal Plant, we urge the Committee to reiterate this request and urge a halt to all construction, permitting, financing, and insuring of the plant until such studies have been completed and reviewed by the Committee, in accordance with the June 2018 UNESCO policy urging insurers and investors to avoid projects that could damage World Heritage sites through large-scale infrastructure projects, pipelines, and mega ports.¹⁰

We also ask the Committee to urge the State Party to actively promote renewable energy in the wider setting of the World Heritage site, in accordance with the World Heritage Committee’s Policy for the Integration of a Sustainable Development Perspective into the Processes of the World Heritage Convention (2015).¹¹

⁸ UNESCO, *Operational Guidelines for the Implementation of the World Heritage Convention*, 103-07 (2017), <https://whc.unesco.org/document/163852>

⁹ <http://whc.unesco.org/en/sessions/42com/records/?day=2018-06-28at1hour,40minutes>.

¹⁰ <http://www.unepfi.org/psi/wp-content/uploads/2018/06/Protecting-our-world-heritage.pdf>.

¹¹ <https://whc.unesco.org/document/139747> at page 5

⁷ Mohammed Mbaadi Ali & Others vs. The Attorney General & Others (Petition 22 of 2012) available at <http://kenyalaw.org/caselaw/cases/view/156405/> (Ruling delivered 30 April 2018).

42 COM 7B.45.11 “requested more over the State Party to invite a joint World Heritage Centre/ICOMOS/ICCROM Reactive Monitoring mission to the property, once the necessary security clearance has been obtained, in order to examine the state of advancement of the LAPSSET project as well as the state of conservation of the property, and to hold discussions with local stakeholder groups.”

Construction on the first three of potentially 32 berths at the Port has continued since 2015 and is nearing completion, causing significant environmental damage since January 2018, including mangrove destruction, siltation and high turbidity of Manda Bay. Kenya’s High Court ruled in April 2018 that the port had proceeded with major “procedural infirmities” and in violation of legal requirements, including lack of a completed SEA, insufficient public participation, discriminatory lack of compensation for fishermen, lack of an environmental management plan, lack of analysis of external costs and alternatives, etc.¹²

In light of new environmental damage from port construction we urge the Committee to reiterate this request for an urgent

monitoring mission, and call for moratorium on all aspects of LAPSSET, including the Lamu Coal Plant. As a coalition of local community stakeholder groups, we look forward to meeting with the monitoring mission during its visit to Lamu Old Town and facilitating broad public participation. However, ongoing security concerns that prevented the January 2018 mission from visiting the site could cause a monitoring mission to the site to be delayed for many years.

Therefore, we urgently call upon the WH Committee to add Lamu Old Town to the List of World Heritage in Danger in 2019, due to 1) the clearly documented ascertained and potential dangers¹³ to the outstanding universal value of Lamu Old Town and its wider setting, based on the findings in the High Court decision of April 2018; 2) the ongoing unwillingness of the State Party to place a moratorium on environmentally destructive development prior to completion of a thorough SEA, ESIA, or monitoring mission, despite many years of World Heritage Committee requests and High Court orders; and 3) potentially endless delay of an on-site monitoring mission.

¹² <http://kenyalaw.org/caselaw/cases/view/156405/> Petition 22 of 2012 (Ruling delivered 30 April 2018).

¹³ UNESCO, World Heritage Convention (1972), Article 11.4, <https://whc.unesco.org/archive/convention-en.pdf> at 6. Article 11.4 provides for listing of a site on the List of World Heritage in Danger if it is threatened by “serious and specific dangers”, including “ascertained danger” or “potential danger”. Ascertained danger is a specific and proven imminent danger, such as “severe deterioration of the natural beauty or scientific value of the property, as by ... industrial and agricultural development, major public works, mining, pollution ... or human encroachment on boundaries or in upstream areas which threaten the integrity of the property.” Potential danger is “major threats which could have deleterious effects on the site’s inherent characteristics... such as planned development projects within the property or so situated that the impacts threaten the property.”

The Historic Centre of Macao is still under threat

Anonymous authors



Fig. 1: The Guia Lighthouse

We, as a group of Macao citizens who care about world heritage, would like to report the Guia Lighthouse, which is one of the structures forming the Historical Center of Macao that was

designed a UNESCO World Heritage Site in mid-2005, is currently under threat from an over-development crisis.

The Guia Lighthouse, which is the first modern lighthouse along the coast of China, is a 15-meter high cylindrical structure atop the 91-meter Guia Hill. It has been serving Macao since 1865. In 2006, the Chief Executive of the Macao Special Administrative Region (SAR) announced the invalidation of Decree Laws 68/91/M-18 and 69/91/M-18 that regulated the height limit of buildings in the New Outer Harbor and Bay of Praia Grande areas (east and south side of the Lighthouse). The Macao government later approved a 99.12-meter building for the Liaison Office of the People's Republic of China central government, and a 126-meter high apartment block at the foot of Guia Hill. Since then people from different professional sectors of society have been paying attention to this crisis. (YU & CHAN, 2014) (Chou, 2009) (Newman M. K. Lam, Ian Scott, 2011-08)

In April 2008, the Macao government issued Chief Executive Dispatch 83/2008 (Despacho do Chefe do Executivo n.º 82/2008) to reset height limits for a part of the south area of Guia Hill (Zone 5-1) from 99-135 meters to 90 meters (see Fig. 2 and 3).

However, the crisis is still not abating due to the fact that the height limits fail to protect the view of the Lighthouse. The Lighthouse is now currently blocked by the on-going, soon-

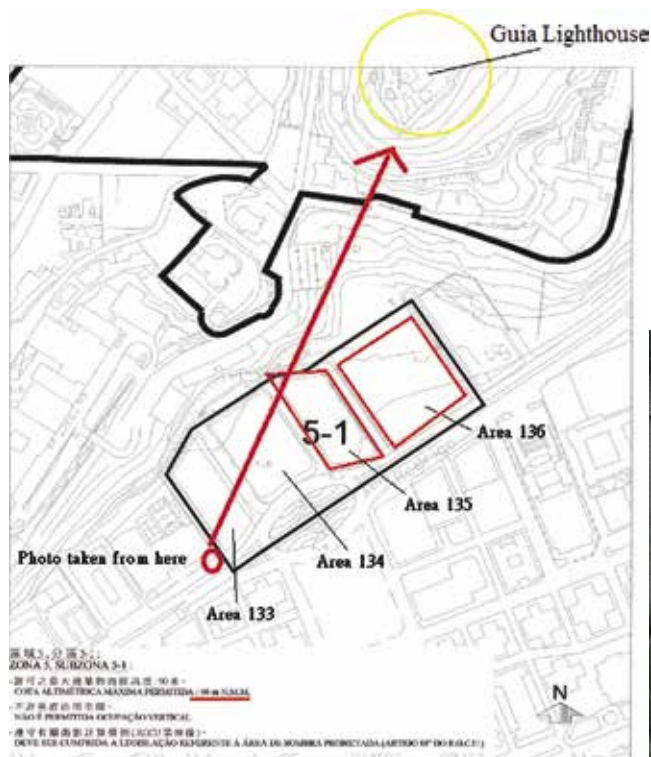


Fig. 2: Zone 5-1 to the South of the Guia Lighthouse, and the point from which photo Fig. 2 was taken.



Fig. 3: View of the Guia Lighthouse from the South.



Fig. 4

to-be 85-meter building (Area 135) and the near 90-meter Liaison Office (Area 136) at the foot of Guia Hill. As we are writing this paper, the construction, which is only hundreds of meters away from the Lighthouse, is accelerating (see Fig. 4).

Furthermore, compared to other height restriction zones issued by Chief Executive Dispatch 83/2008, the height limit in Zone 5-1, where buildings at Area 133, 134, 135 and 136 are located, are unreasonably higher than most of the other Zones. Not to mention Zone 5-1 is only hundreds meter from the Lighthouse (see Fig. 2).

Moreover, Guia fortress is the location where typhoon signals are hoisted. Once the near-90-meter buildings in zone 5-1 (see Fig. 2 and 3) are all completed, people from the south of the Guia Lighthouse can no longer notice the typhoon signal on Guia hill. In other words, the constructions in zone 5-1 are not only a risk to world heritage, but also putting people's safety into danger (Macao SAR, 2018).

Another point to be emphasized is that these constructions will only benefit a few real estate developers. Some believe that the local government may "appear to be bowing to real estate developers and letting commercial benefits take precedence over Macao's cultural resources". (Macao Daily Times, 2016)

Even more seriously, there is a great possibility that two more near-90-meter buildings (DSSOPT, 2016) (DSSOPT, Planning Map for Area 133, 2016) at the foot of Guia Hill are going to be built in the future (Area 133 and 134, see Fig. 2). Once the constructions are all completed, the Lighthouse will no longer be seen from the south (macauarchitecture, 2007).

As for suggestions for action, we request any constructions in Zone 5-1 must be put on hold immediately until the height limit is reset to a reasonable limit (around 40 meters), a limit that allows people to see Guia Lighthouse from the foot of Guia hill.

Links

Despacho do Chefe do Executivo n.º 82/2008 (Portuguese): https://bo.io.gov.mo/bo/i/2008/15/despce_cn.asp

AVENIDA DO DR. RODRIGO RODRIGUES, NO. 527 - 553, (ANTIGO: ZAPE LOTE 135), MACAU (Portuguese): https://www.dssopt.gov.mo/pt/sites/presale/id/45?obj_id=138&type=show

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V. Monuments and Sites

Stonehenge, Avebury and Associated Sites WHS Still Under Threat of Road Construction

Kate Fielden, Stonehenge Alliance^[1]



Fig. 1: Stonehenge and Bush Barrow from the south. Vehicles on the A303 are only just visible between these two monuments.
Photo: Kate Fielden

The severe threat to the fabric, setting and integrity of the “Stonehenge, Avebury and Associated Sites” WHS from road engineering was outlined in *World Heritage Watch Report 2018*.^[2] In the same report, the background to some twenty years of the UK Government’s road-building ambitions at Stonehenge was summarised, along with the involvement of the World Heritage Committee and the efforts of civil society to protect the WHS.

The A303 Stonehenge Expressway project has undergone public consultation and, at the time of writing, has been accepted by the Government’s Infrastructure Planning Inspectorate for Examination by a panel of planning Inspectors early in 2019. As a Nationally Significant Infrastructure Project, the scheme comes under a special legal procedure enabling it to be fast-tracked and restricting the grounds on which it may be challenged.

The aim is to approve the scheme, unless compelling reasons arise for refusal, and to start work on it as soon as practicable, so long as the funding is in place.

International advice

A third Advisory Mission of World Heritage Centre and ICOMOS specialists was invited by the UK Government to Stonehenge in March 2018, to learn about progress on the Expressway proposals and to advise on appropriate ways forward. The mission took place during formal public consultation on the road

scheme, thus giving time for no more than minor adjustments to proposals which had already been decided upon.

The Advisory Mission’s thorough report, available in June 2018, like those of previous missions, reminded the State Party of its obligations under the World Heritage Convention. It found that *“The tunnel would remove the road from the central part of the Stonehenge component of the WHS but the construction of four-lane highways in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity, authenticity and Outstanding Universal Value (OUV) of the WHS, particularly through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact.”*^[3]

The correct ICOMOS method of heritage impact assessment^[4] had been used, but the mission inferred that the final analysis was unsatisfactory, saying “the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how adverse impact on OUV can be avoided.”^[5] Among the mission’s recommendations was that the road scheme “should not proceed in its current form” and that “it would be appropriate for the process of advisory missions to continue beyond the [planning] application stage as alternative plans are developed for this highly significant major project.”

The correct ICOMOS method of heritage impact assessment^[4] had been used, but the mission inferred that the final analysis was unsatisfactory, saying “the appropriate ‘test’ is not whether there is a net benefit to OUV, but rather how adverse impact on OUV can be avoided.”^[5] Among the mission’s recommendations was that the road scheme “should not proceed in its current form” and that “it would be appropriate for the process of advisory missions to continue beyond the [planning] application stage as alternative plans are developed for this highly significant major project.”

The 42nd meeting of the World Heritage Committee was held in July 2018. The World Heritage Centre’s report to the Committee on the Stonehenge, Avebury and Associated Sites WHS summarised the findings and recommendations of the latest advisory mission. The wording of a draft Decision, prepared for the Committee’s consideration, urged the UK Government to “explore further options ... with a view to avoiding impact on the OUV of the property, including: a) alternative surface bypass options” [and] b) longer tunnel options that ... do not require dual carriageway cuttings within the property.”

Quite unexpectedly, a considerable number of amendments to the draft Decision on Stonehenge were submitted at the last

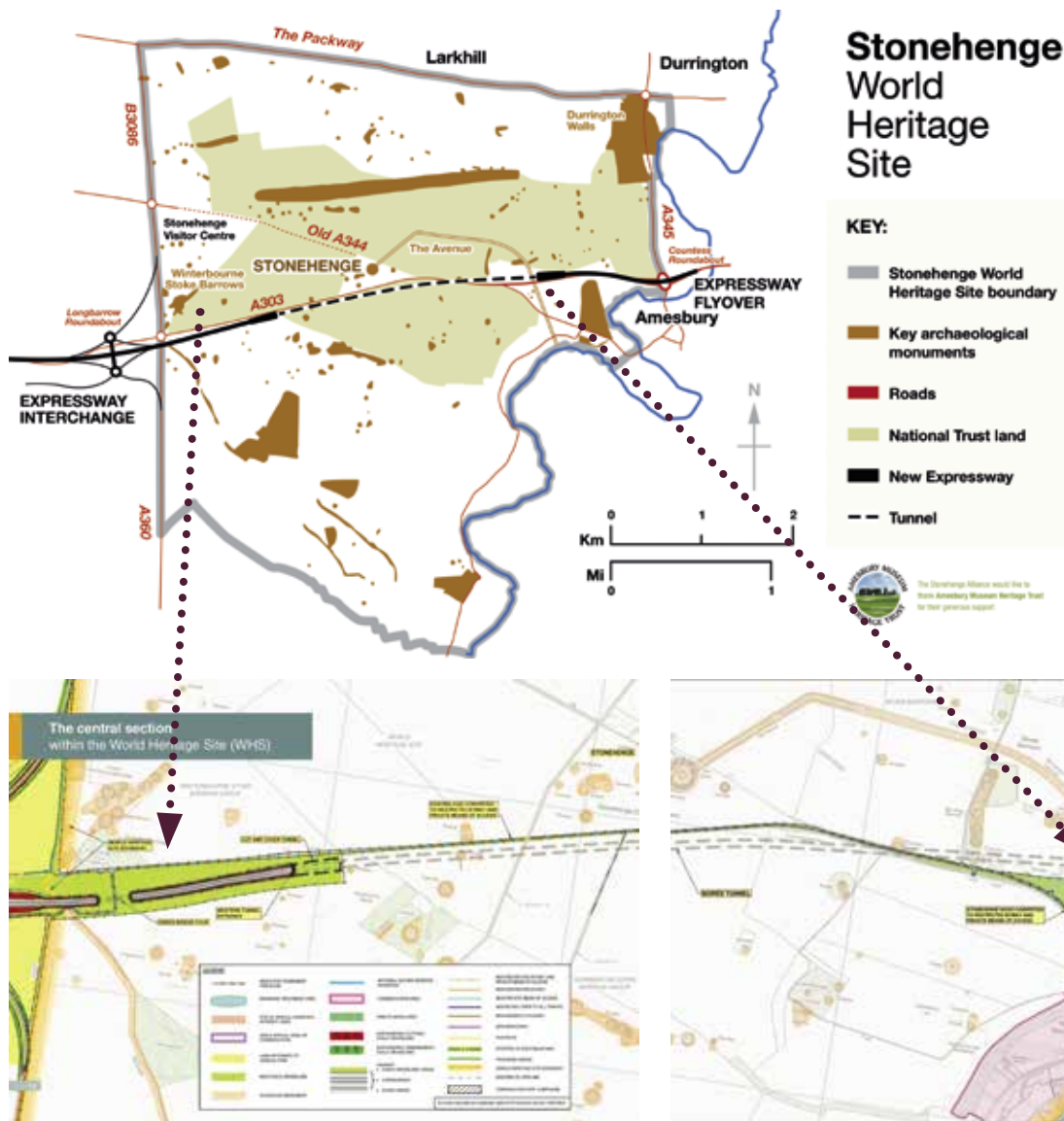


Fig. 2: Map of the Stonehenge WHS showing the proposed A303 Expressway, tunnel and junctions. Detailed maps show the Western and Eastern tunnel entrances.

Graphics: Courtesy Amesbury Museum and Heritage Centre (upper map) and Highways England (lower maps)

minute by Spain. Carefully worded, with close understanding of what would be required to minimise the concerns and recommendations in the draft Decision, these amendments were strongly endorsed by a UK Government spokesperson on the day. Fortunately, following a statement made on behalf of civil society via World Heritage Watch, the amendments were largely neutralized in discussion and revision.

The final Decision recalled the advice of the Advisory Mission that “the A303 upgrade should not proceed with the current length of tunnel”, and urged the State Party to “explore further options and design refinement, with a view to avoiding impact on the OUV of the property”.^[6] The politicization of the World Heritage Committee has been evident in the past;^[7] and we suspect the proposed amendments may have been a regrettable instance of it.

The current position

Objectors to the Expressway application must register with the Planning Inspectorate as Interested Parties and submit an out-

line ‘Relevant Representation’ to the Examining Authority by 11 January 2019. The Relevant Representation briefly sets out the grounds for objection and allows the Examining Authority to decide, after considering all such representations, what matters to include in their Examination of the scheme. There will be a later opportunity to enlarge upon our concerns in writing and the possibility of being permitted to speak at the Examination. It is anticipated that the process will be completed by the summer of 2019, with a recommendation by the Examining Authority to the Secretary of State for Transport to proceed with the scheme, unless there are strong reasons to advise otherwise.

Study of the more than 300 documents forming the Development Consent Order application for the road scheme reveals little change in the plans since the World Heritage Committee met in 2018. A substantial heritage impact assessment judges impacts of road engineering on attributes of OUV (largely identified as certain groups of monuments which would be avoided therefore not physically damaged) but fails to prop-



Fig. 3: Visualisation of western approach to new Longbarrow Junction.

Graphic: Courtesy Highways England

erly examine the severe impacts of the scheme on the setting, fabric and integrity of the WHS itself.

Photomontages of views within the WHS and its setting noticeably avoid visual impressions of the 4-lane Expressway, tunnel portals and junctions that visitors could experience at close quarters when able to explore the wider WHS as one of the claimed benefits of the scheme. The noise of fast-moving traffic and tunnel extractor fans is generally glossed over or ignored. A “green bridge” proposed over the deep cutting on the western side of the WHS emphasises the severity of the enormous gash that would be formed to the tunnel portals, adding to the highly incongruous 21st-century re-modelling of the landscape. False images are provided of the scheme in operation, mostly lacking the extensive fencing, lighting and other street furniture that would be required.

Without relevant photomontages, it is difficult to gain a true impression of the permanent and temporary impacts on the setting of the WHS of major features such as the massive interchange planned on the western WHS boundary or the adjacent extensive works compound required for around five years of scheme construction.

In a number of instances, scheme application documents assure the reader that “the scheme would resolve traffic problems and, at the same time, protect and enhance the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage Site”; The documents also remind us repeatedly that one of Government’s four key objectives for the road scheme is “to help conserve and enhance the WHS.”^[8] These claims are plainly untrue.

Heritage value assessments

The estimated capital cost of the scheme has risen to £1.7bn. Highways England gives the scheme a low value for money estimate boosted by a monetised heritage benefit element without which the scheme would provide poor value for money. The contingent heritage valuation was arrived at by asking a

relatively small number of people what value they would place on a c.3 km tunnel past the henge. They were not asked what value they might place on removal of the road from the WHS altogether. A further unconvincing survey referred to concluded that 75% of visitors questioned would not object to losing the famous and much-loved view of the Stones from the A303 or that its loss was less important than reducing traffic or protecting the WHS, neither of which would result from the scheme. Such valuation exercises may be standard in assessing the monetised value of the heritage but they raise serious questions about their validity in the case of major alterations proposed to a WHS.



Fig. 4: Stonehenge from the north.

Photo: Kate Fielden

The role of civil society

The Stonehenge Alliance continues to engage with concerned organisations and individuals throughout the World about the threat to the Stonehenge landscape. This is principally achieved via social media and our website managed by our communications lead, Kate Freeman. Our petitions have gained over 42,000 signatories from more than 100 countries, many of them sending us messages of concern and encouragement. With our help, the majority of those responding to each of Highways England's three consultations on the A303 proposals objected outright to the scheme, principally owing to the need for proper protection of the WHS and its transmission to future generations.

We are pleased that distinguished prehistorian Professor Mike Parker Pearson has headed a short but explicit video for us, explaining his serious misgivings about the A303 scheme.^[9] We are now preparing for the formal Examination of the road scheme. We shall not only encourage our supporters to consider registering as Interested Parties, but we must also appeal for funds to employ specialists to challenge key aspects of Highways England's proposals.

What can international advisers do to help?

The views of the World Heritage Centre's international advisers have been crucial to our continuing campaign to save the WHS. We have gained confidence and reassurance in knowing of their concerns and clear advice to the UK Government.

There are indications that the concept of OUV is now understood by Highways England but there remains confusion in understanding between protection of OUV and protection of the WHS: we hope that clarification on this and on the method of assessment of overall impact of development on a WHS will be given in any forthcoming revision of ICOMOS' 2011 Guidance on Heritage Impact Assessments for World Heritage Properties.

The UK Infrastructure Planning Inspectorate has indicated its interest in how the scheme relates to the World Heritage Convention. Highways England, in assessing as 'slightly beneficial' the impact on the WHS of its hugely damaging scheme, is confident that the WHS designation is not threatened by it. We sincerely hope that the World Heritage Centre's international

advisers will not be of the same opinion: we urge them to recommend that the WHS is placed on the List of World Heritage in Danger in the hope that the UK Government will reconsider its plans for Stonehenge before it is too late.

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- [1] The Stonehenge Alliance is supported by Ancient Sacred Landscape Network, Campaign for Better Transport; Campaign to Protect Rural England; Friends of the Earth; Rescue: The British Archaeological Trust; and many individuals throughout the World. <http://stonehengealliance.org.uk/>.
- [2] Fielden, K., "Stonehenge, Avebury and Associated Sites WHS under Threat of Road Construction", World Heritage Watch Report 2018 (World Heritage Watch, Berlin 2018), pp. 156–159. Accessible at <http://world-heritage-watch.de/content/wp-content/uploads/2018/06/2018-Report-WHW.pdf>. Note: two lines of text are missing from the first paragraph of this article as printed. The paragraph should read: "Stonehenge, Avebury and Associated Sites" in the county of Wiltshire, was designated a cultural World Heritage Site for its remarkable remains of the Neolithic and Bronze Ages. The site is in two parts, some 40km apart, each some 26 sq. km in area. Notable 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".
- [3] World Heritage Centre/ICOMOS, "Final Report on the joint World Heritage Centre/ICOMOS Advisory mission to Stonehenge, Avebury and Associated Sites, 5–7 March 2018" (UNESCO 2018), p. 6. Accessible at: <https://whc.unesco.org/en/documents/168265>
- [4] ICOMOS, Guidance on Heritage Impact Assessments for Cultural World Heritage Sites (ICOMOS 2011). Accessible at: https://www.icomos.org/world_heritage/HIA_20110201.pdf.
- [5] World Heritage Centre/ICOMOS, op. cit., p. 7.
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- [8] For example, Highways England, Development Consent Order Application Document 4.1: "Statement of Reasons", pp.1-1 and 1-2, paras. 1.2.3 and 1.2.4. Accessible at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-000176-4-1-Statement-of-reasons.pdf>
- [9] Mike Parker Pearson, Stonehenge tunnel creates a bad precedent. Video produced for the Stonehenge Alliance (introduced by Alliance President Tom Holland), published 23 October 2018. Accessible at <https://www.youtube.com/watch?v=qLGBBTt1JnI>.

Altamira: Integrity and Authenticity as a Political Tool

Andrea Martinez Fernández

The cave of Altamira contains archaeological levels of the Upper Palaeolithic but is mostly known for the Great Hall of Polychromes, the “Sistine Chapel of Pre-history” (Fig. 1). The discovery of the cave led to a series of scientific debates regarding the origin of humankind, religion and evolution. Altamira has been a symbol in Spanish society, and although the cave art is slowly deteriorating, the values are present. They are represented in the museums, the mass media, education material and national imaginary. Altamira is still taught at schools as the masterpiece of the Palaeolithic era.

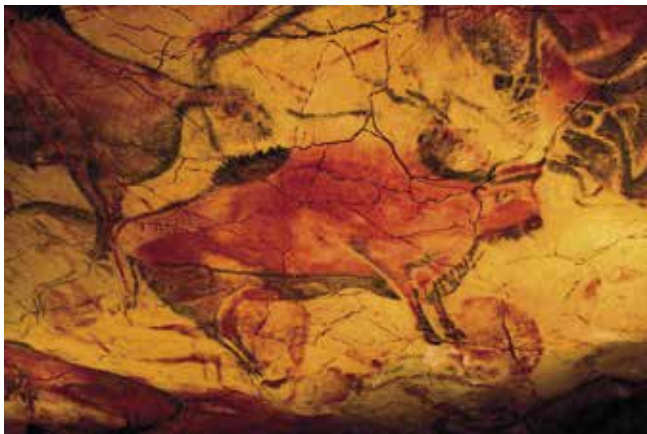


Fig. 1: Detail from the Hall of Polychromes, Altamira cave

Source: <https://www.ancient.eu/image/4169/paleolithic-cave- painting-in-altamira-cave/>

The situation

Altamira is suffering the consequences of decades of exploitation, having been a touristic attraction since the early 20th century when the first site museum was created in 1924. Over the years, interest on the cave increased and the tourist flows arrived at Altamira and Santillana del Mar, the historical town some three kilometres away. In 1973, a new site museum was opened, with enough space to receive the visitors while also serving as a research institution. The current museum was inaugurated in 2001 in order to adapt the visits to the particular situation of the site.

Until 1977, the cave suffered major degradation as there were no controls over the number of visitors entering the cave, or the visitation conditions (Heras Martín and Lasheras, 2009). In 1979 a decision was made to study and analyze the conditions of the cave to create a sustainable regime of access. From 1982, the

access to the cave was restricted to a certain number of visitors per month, and no more than 8,500 per year. Potential visitors needed to make a reservation in order to access the cave with a wait of up to three years if they wanted to see the cave. But the high demand resulted in a solution by experts to reproduce the hall of polychromes, called the Neocave, inaugurated in 2001 (Heras Martín and Lasheras, 2009). In 2002 the cave was closed again, awaiting the results of a new analysis.

Since 2014, visits are limited to six people that are randomly picked among all Sunday visitors (Fig. 2). This approach was launched as a part of the risk assessment strategy, as a way to evaluate the impact of the presence of human visitors inside the cave. But in reality, it was masking a whole new marketing strategy that was conducted to gain more support on the politicians’ intentions to re-open the cave.

The damage caused in the cave, according to the last investigations, is considered to be irreversible (CSIC, 2014). The rise of the temperature inside the cave by half a degree, increased humidity and water leaks are making the paintings fade, but they are also contributing to create an environment where bacteria and fungi can grow. The conditions that preserved the paintings for thousands of years have disappeared. This has generated a debate around the conditions of authenticity that are beyond the physical environment of the original cave. If the degradation process is irreversible and the paintings are going to disappear one way or another, why should we impede the



Fig. 2: Current situation of the entrance of the cave. The selected visitors entering the cave.

Source: museodealtamira.com

people to visit the cave? Why keep the paintings for an uncertain future, ignoring the necessities of the present?

For that, we need to take into account the conditions of authenticity as understood in the Operational Guidelines. Although recommended for an extension – which occurred in 2008 –, since then no further information according to § 172 of the Operational Guidelines has been submitted by the State Party. There is no full statement of Outstanding Universal Value, and texts on authenticity, integrity and management are lacking. The nomination file, referring to the new serial nomination, states that ... *at present, the proposed property is closely guarded and supervised in its parameters of conservation and does not suffer from the adverse effects of development and neglect. Hence, the physical structure of the property and its significant features are in good condition and the impact of the processes of deterioration is under control, as described in the following section* (Nomination file 2008, page 110). Being fair, this statement includes all the other caves that do not suffer from adverse conservation issues, but does not relate to the specific conditions of the Altamira cave.



Fig. 3: The Spanish region of Cantabria with Altamira and the 17 other caves inscribed.

Map: Google Earth / Andrea Martínez

This statement is from 2008, when the conservation problems were very well known. Taking into account the current state of conservation, the sample of Palaeolithic art that the nomination represents is put at risk, challenging the Outstanding Universal Value of the site. The possibility, or the necessity, to inscribe the property in the World Heritage List in Danger has not been discussed even though the loss of OUV of one part may jeopardise the integrity of the whole serial inscription. The integrity of Altamira is essential for the property, whose importance is underscored in the name of the nomination itself and by the fact that it used to be a single nomination for more than 20 years. Without this cave, the property is endangered. The OUV is disappearing as an unstoppable consequence of mass tourism, and this is not being addressed.

The last Advisory Body evaluation was made by ICOMOS in 2008, coincident with the re-nomination of the site as a serial inscription, while periodic reports were done in 2006 and

2014. However, the issue of conservation and the polemic decision of reopening the cave have not been addressed. This has led to the fact there is incomplete data as to the real condition of the property, affecting the draft decisions of the World Heritage Centre.

According to the Ministry of Culture, Education and Sports (MECD)'s Permanent Lab of Museum Visitors, Altamira Museum, which is a State Museum, currently receives around 250.000 visitors each year, mainly Spanish families visiting in summer, as well as school classes.

The Museum is directly related to the property through the MECD, and different parties are represented, managed by a Patronage, a committee of 21 members. Eight of them are political appointees and 2 of them are affiliated to the Santander Bank, but only 4 are experts in rock art, 3 are academics, 2 are heritage experts and the other 2 belong to other cultural institutions. First, we have the central and the autonomous governments, both represented by the presidents of each territory, serving also as the co-presidents of the Patronage. The

vice-president is the current director of Santander Bank, with its headquarters located in the homonymous city of Santander, capital of the autonomous community. The Santander Bank participates in the funding of many archaeological campaigns in the Cantabrian territory, selling tickets of the museum, and the family that runs the bank happens to be descendants of the scientific discoverer of the cave, Emilio Sanz de Sautuola.

With such an under-representation of experts, the majority decisions are made by the Patronage for their economic and political interests. As we can see in Fig. 3, the rise of the number of visitors in 2016 is directly related to the reopening of the cave. Altamira Museum is a profitable place, and its reopening would mean a lot of visits. The economic interest doesn't just rely on the site itself, but its role as a gate to promote the rest of the region as a touristic destination.

The conclusions of the impact assessment study carried out by the CSIC (Consejo superior de Investigaciones Científicas) between 2007 and 2009, one of the most important scientific research institutions at national level, were published in 2014 and suggested that the cave should remain closed (Sánchez Moral et al., 2014). The Patronage and the administration did not like this recommendation, and the central government commissioned a new impact assessment study done by its newly-appointed scientific director, Gaël de Güichen, known for his

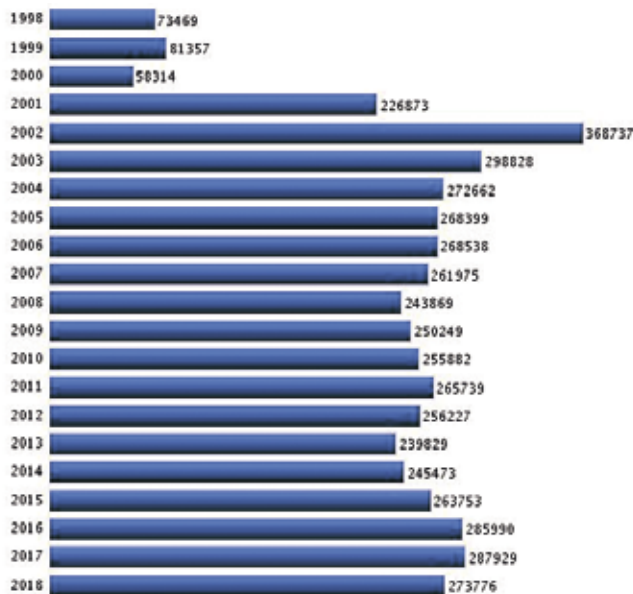


Fig. 4: Graph that shows the frequency of visitors for the past 20 years. Source: MECD

record favouring the reopening of the caves. (de Güichen, 2014). His position is that the maximum number of people possible should be able to visit the cave, arguing that the impact of the tourists is not as critical as previously determined.

Even though the Neocave represents the physical and aesthetic attributes of the original cave, it is neither the original nor contains the values that the cave represents. The property is inscribed under criteria (i) and (iii), which broadly means a recognition of its artistic, aesthetic and archaeological values. The associations are not recognized as there is no criterion (vi) present, so authenticity is very important in a nomination like this. It is not only very important for the scientific and archaeological value of the cave, but also for remaining on the list as the material substrate bearing these values.

Conclusions

To retain Altamira as a pre-historic property will prevent it from turning into a commodity, which is the current course. Commercialization empties the site of its values and banalizes it. We have to encourage people to come for the educational interest, not only the economical one, and this is something that Altamira makes easy. People know that the cave is closed, they do not go there to see a monument, people go to visit a museum, to learn, and to satisfy the curiosity of their kids. If people are not asking for an opened cave, why should we give them one? Instead of creating documentaries such as *Altamira, the importance of the Original* (TVE, 2014), projecting an aura of mystery and feelings, we should be focusing in the importance of Altamira that goes beyond the stone walls.

The realities of the property's state of conservation first and foremost require its inscription in the World Heritage List in

Danger. Drawing international attention to this matter could not only help to add pressure on is managing authority, the Patronage, but also to expose the critical issues that the serial inscription is facing. The site and its values are about to disappear at some point because of excessive touristic exploitation, and this will need special protection and attention from the World Heritage Committee.

Secondly, a balance between Altamira and the rest of the inscribed caves must be created. The autonomous communities, knowing the damage caused in Altamira, have developed a much more sustainable strategy to manage tourism in the caves. Only the caves that can have an adequate access can be visited, groups are small, and the guides are very well trained.

The tourism development strategy to promote Cantabria as a rock art destination should prioritize these caves and the promotion of their social value, not Altamira. By creating a balance, we focus the attention and pressure away from the cave of Altamira, where the original remains important for science, with the hope that the politicians would understand that as there are a further 17 original caves that share similar values where a sustainable and successful tourism strategy can be implemented.

Recommendations

- Based on well-established and undisputed ascertained dangers to Altamira's OUV, the World Heritage Committee should inscribe the property in the List of World Heritage in Danger, as a matter of urgency and credibility;
- The World Heritage Committee should insist that the property is managed with paramount priority given to its protection and conservation. This must be reflected by a majority of independent heritage conservation experts in the property's management authority, including its decision-making leadership.
- The World Heritage Committee should urge the Spanish State Party to initiate a process of public discussion, with broad involvement of national and international experts, all stakeholders and civil society, in order to arrive at a solution concerning the opening of the Altamira cave which is supported by a broad majority in Spanish society. Until then, the cave should remain closed at all costs in order to retain a chance to hand down the Altamira cave to the posterior world without inflicting on it further damage.

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Austria: Großglockner High Alpine Road – a World Heritage Site?

Christian Schuhböck, Alliance for Nature

ALLIANCE FOR NATURE



Fig. 1: Mt. Großglockner, with 3.798 m the highest mountain in Austria (in the High Tauern massif) and the Großglockner High Alpine Road. Photo: Christian Schuhböck

According to media reports in Austria, the “Großglockner-Hochalpenstraße” (Großglockner High Alpine Road) has been nominated as a UNESCO World Heritage Site in Spring 2017.

Historical background

In 1988-1989, the NGO “Alliance For Nature” (AFN) ran the public campaign “Rettet das Dorfertal” (Save the Dorfer Valley) in order to protect the alpine landscape of the High Tauern from the construction of a hydro-electric storage power plant at Dorfertal-Matrei. The power plant was cancelled on the political level, which opened the way for the creation of the High Tauern National Park, spanning the provinces of Carinthia, Salzburg and Tyrol.

Between 1990 and 1992, Alliance For Nature had strongly advocated for Austria’s accession to the World Heritage Convention, and was authorized by the World Heritage Centre to use the UNESCO World Heritage emblem in this context. The Republic of Austria acceded to the Convention in March 1993.

In January 1993, Alliance For Nature started the initiative “World Cultural Heritage Semmeringbahn” with the aim of including the landscape of the Semmering and its high mountain railway (Semmeringbahn) in the List of UNESCO World

Heritage Sites. In 1998, the Semmeringbahn and surrounding landscape was declared a UNESCO World Heritage as the first railway worldwide. AFN’s initiative subsequently became an international model as India led the Darjeeling-Himalaya Railway in 1999, the Nilgiri Mountain Railway in 2005, and the Kalka Shimla Railway in 2008, into the circle of World Heritage Properties. In 2008, Switzerland followed suit with the Rhaetian Railway in the Albula/Bernina landscape for World Heritage.

At the end of the 1990s, Alliance For Nature was asked by a member of the UNESCO World Heritage Committee to become active on behalf of the nomination of a European Alpine Landscape as Natural World Heritage since at that time no such site had been on the World Heritage List.

Therefore, Alliance For Nature became involved in the nomination of the potential natural World Heritage Site, Jungfrau-Aletsch in the Berner Alps and gave the decisive impulse by negotiations with mayors of the region and the Swiss Environmental Agency. In addition, Alliance For Nature elaborated a perimeter suggestion (boundaries of the area) since we believed that the formerly envisaged area was too narrowly spaced and that additional areas of the Berner Alpen (Blüemlisalp, Wetterhorn) should also be included. In addition, one mayor suggested to create buffer zones between the sensitive natural spaces and the intensively developed touristic areas.

In Spring 2001, Alliance For Nature handed in its perimeter suggestion to IUCN and presented it in the framework of a media conference in Bern to the Swiss public. At the end of Spring 2001, IUCN recommended the inscription of the Swiss Jungfrau-Aletsch-Bietschhorn area in the World Heritage List, which took place in December 2001. In addition, IUCN suggested (in line with the suggestion of AFN) to enlarge the World Heritage area by Blüemlisalp and Wetterhorn which took place in December 2005.

At the national level, Alliance For Nature suggested the nomination of the High Tauern National Park¹. This nomination was, however, withdrawn by the Republic of Austria because it did

¹ The Hohe Tauern National Park has been on the Tentative List of the Republic of Austria since 2003.

not (at that time) correspond to the IUCN criteria of an internationally recognized National Park (IUCN category II protected area), and Austria wanted to avoid a rejection of its nomination².

When by mid-September 2006 the entire High Tauern National Park (spanning the provinces of Carinthia, Salzburg and Tyrol) was acknowledged as a IUCN Category II protected area (National Park), Alliance For Nature submitted in December 2006 a suggestion to the politicians in charge to nominate the core zone of the High Tauern National Park as a Natural World Heritage. Because of a change of political circumstances in Austria, however, the common political will of all three provinces concerned could not be achieved. A few years later AFN suggested to submit the alpine region of the High Tauern together with the Großglockner High Alpine Road as a combined World Natural and Cultural Heritage Site ("mixed site"), so that Austria would have at least one World Natural Heritage site – but again in vain.

The present situation

Instead, in 2017, the Großglockner High Alpine Road alone was nominated as World Cultural Heritage without taking the op-

portunity to have the beautiful, breathtaking mountain landscape put under the protection of the international community.

This motion caused some surprise as there had been an expressed intention earlier to nominate the High Tauern National Park as Natural World Heritage.

According to the statement and media reports, the purpose of listing the Großglockner High Alpine Road was to **stimulate tourism**: *"The inclusion of the Großglockner High Alpine Road in the UNESCO list as the second World Cultural Heritage in the Province of Salzburg would be a real boost to local tourism. One has become aware that the Asian markets in particular have developed a kind of heritage tourism."* (Leo Bauernberger, director of Salzburger Land Tourismus GmbH, the province's tourism marketing agency).

The UNESCO World Heritage Convention however, was not passed in 1972 to be a **motor of tourism** but for purposes of protection and conservation of universally important natural landscapes and cultural monuments.

Already now the Großglockner High Alpine Road attracts up to 900.000 visitors annually. *"On peak days we have up to 5.000 vehicles and could easily cope with a plus of 30 to 50 per cent"* says Johannes Hörnl, managing director of Großglockner Hochalpenstraße Aktiengesellschaft (Großglockner High Alpine Road, Inc.) (quote from: Thomas Sendlmaier: "Das Welterbe ist unendlich wichtig". KURIER, 21 February 2017, p. 17).

² Normally, a re-application cannot be accepted according to item 158 of the UNESCO World Heritage Operational Guidelines if the UNESCO World Heritage Committee has earlier decided not to inscribe the property because it does not meet the relevant criteria.



Fig. 2: The Großglockner High Alpine Road crosses the High Tauern Range in a narrow corridor between two sections of the National Park, passing in direct vicinity of Mt. Großglockner.

Map: Nationalpark High Tauern / adapted by Andrea Martinez

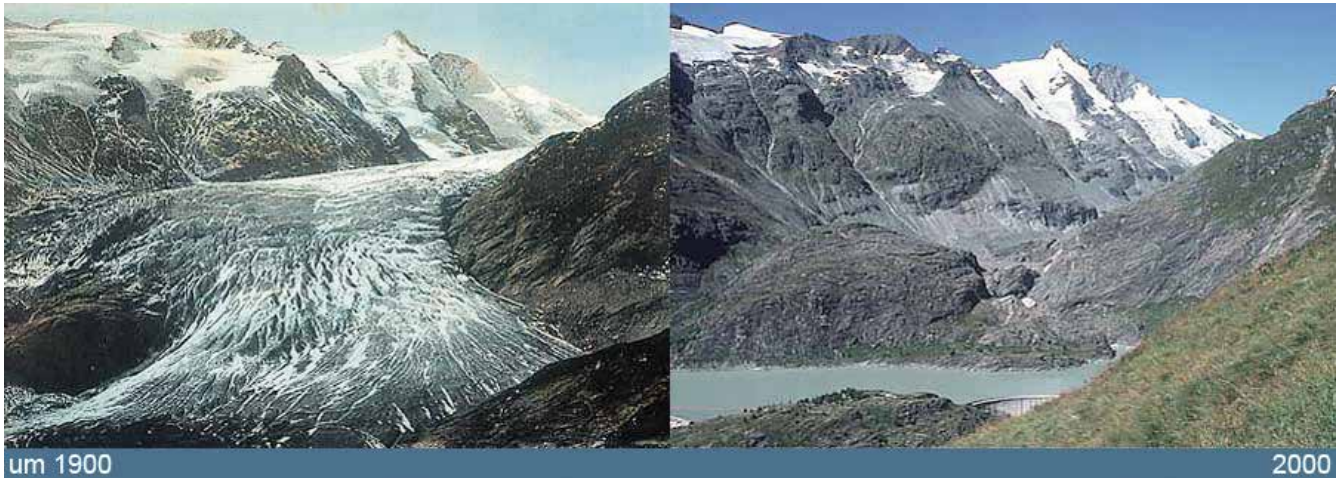


Fig. 3: Pasterze, Austria's largest glacier around the years 1900 and 2000.

Photos: CIPRA

Due to climate change, to which man has been contributing since the beginning of industrialization³, the glaciers of the Alps are diminishing dramatically. This is also the case for the Pasterze, Austria's largest glacier, which is the most important sightseeing destination on the route of the Großglockner High Alpine Road.

The position and recommendation of Alliance For Nature

From an ecological point of view, the alpine landscape of the High Tauern is a highly sensitive region that should be kept clear of mass tourism – particularly by motor cars. Already now several thousands of cars pass the Großglockner High Alpine Road every day. A UNESCO World Heritage listing would lead to further increase of motorized traffic. One ought to ask the question whether a nomination would not ultimately cause more damage than benefit.

A report from February 21st 2017 in the Austrian newspaper "KURIER" clearly indicates that the only goal of the nomination is profit maximization; conservation measures are clearly disregarded⁴. With a view to a national park region, and taking into consideration the aims of nature conservation, such an attitude is absolutely unacceptable!

Alliance For Nature therefore recommends to consider the inscription of the Großglockner High Alpine Road in the UNESCO World Heritage List only under the condition that:

- in a **first step** the **High Tauern National Park** (core and buffer zones) will be inscribed on the World Heritage List after nomination and evaluation as World Natural Heritage,
- in a **second phase**, the Großglockner High Alpine Road will be nominated under cultural criteria as an **extension** of the by then existing World Heritage property "High Tauern National Park", creating a mixed Cultural and Natural property;
- and that a **limitation on numbers** of cars using the Großglockner High Alpine Road will be fixed (including mandatory reporting to IUCN, ICOMOS and/or UNESCO with an exact listing of trips that have taken place according to the types of motor vehicles and statement of the seasons of the year) – similar to procedures concerning other ecologically sensitive regions (e.g. Galapagos Islands).

Alternatively, given the fact that the Großglockner High Alpine Road bisects two parts of the High Tauern National Park in a very narrow corridor, both the Park and the Road could be nominated together as a contingent mixed property.

Making the Road and the Park part of the same World Heritage property would send a message that:

- UNESCO bears in mind climate change,
- protection and conservation of this highly sensitive alpine region is of priority interest,
- a nomination of the High Tauern National Park would slightly improve the imbalance between cultural and natural heritage sites in Europe.

³ The Intergovernmental Panel on Climate Change [IPCC] states in its 5th situation report, published in 2013, that it is extremely probable that man has caused more than 50 per cent of global warming between 1951 and 2010.

⁴ Thomas Sendlmaier: „Das Welterbe ist unendlich wichtig“. KURIER, 21 February 2017, p. 17

The Dacian Fortresses of the Orăştie Mountains: 20 Years Without a Management System

Aurora Peţan, Dacica Foundation

The Dacian fortresses of the Orăştie Mountains is a serial WH Property consisting of six monuments located in South-West Transylvania, in the counties of Hunedoara (Sarmizegetusa Regia, Costeşti-Cetăţuie, Blidaru, Piatra Roşie, Băniţa) and Alba (Căpâlna) and dating back to the period of the Dacian Kingdom (between the 1st century B.C. – the beginning of the 2nd century A.D.).

In spite of the protection guaranteed by Romanian legislation, more than 20 years after their World Heritage listing, these monuments still do not have a management system (except Sarmizegetusa Regia, whose management is recent and unprofessional) and are neglected. Therefore, they are prone to degradation and archaeological looting, deprived of the valorisation and promotion they well deserve, while the protection of their Outstanding Universal Value as defined by the World Heritage Convention is not ensured.

Legislative issues

Although laws granting protection and a legal framework for the management of these fortresses exist, they are either not enforced or in conflict with one another.

Law 564/2001 stipulates that the monuments included in the WH List are special objectives for whose protection the Ministry of Internal Affairs is responsible, free of charge. However, this has not been applied as such, as some articles of this law are in conflict with the Law of Gendarmes. At present, there is an initiative to modify this law, so that private security companies will be in charge of protection instead.

The Government Decision 1268/2010 that approved the Program of protection and management of UNESCO monuments had a

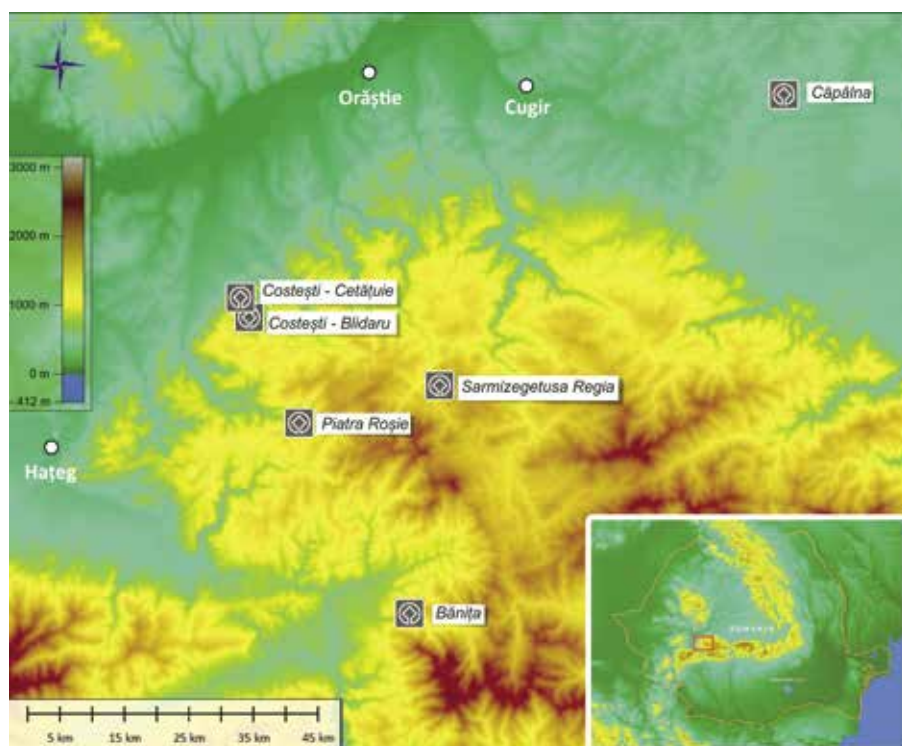


Fig. 1: Location of the Dacian Fortresses of the Orăştie Mountains, Romania.

Background map: SRTM Worldwide Elevation Data, adapted by Aurora Petan

limited duration of five years. At the termination of this program, no new one was elaborated, and, at present, these WH Properties have no site managers and no management plans.

Management

In 1999 the Dacian Fortresses were included on the WH List under criteria (ii), (iii) and (iv)¹. Although 20 years have passed since then, five out of the six fortresses still do not benefit from any form of administration, being completely ignored and abandoned. Nothing has been done during this period: They are now in the same state (or even worse) as before entering the WH List. Their state of conservation is critical, no consolidation or restoration works have been done, they are not guarded, not promoted, there are no informative materials for tourists or guided tours, and the access routes and infrastructure are poor.

¹ <http://whc.unesco.org/en/list/906>



Fig. 2: Piatra Rosie Fortress: the only explanatory panel (left) and the main entrance to the fortification (right).

Photos: Aurora Pețan

This is due to the Ministry of Culture's lack of interest, as it alleges issues related to the property regime over the respective land.

In 2012 the Hunedoara County Council succeeded in obtaining the transfer of the management rights of the Sarmizegetusa Regia Fortress from the Ministry of Culture. For six years, the county administration has not succeeded in setting up an efficient management. There is no management plan, and the responsible staff has not been trained for that specific job. They don't have any expert in heritage management or tourism, and the only archaeologist position that existed has been recently

closed. Moreover, according to the current job description, the site manager position requires only middle school education.

Although some achievements are visible (elaboration of visiting regulations; guarding of the site; periodical cleaning of vegetation), the site has been seriously affected on several occasions by the action of its administration. They have used inadequate methods of site maintenance and cleaning, like burning vegetation on large areas, which resulted in the destruction of original stone blocks of the fortification, and impairing deep soil inside the fortification and the sacred area.



Fig. 3: Burning of vegetation at Sarmizegetusa Regia that has affected the monument. Left: Dacian block of stone burnt by the site administration; right: firepit near the western side of the fortification.

Photos: Aurora Pețan, 2013



Using inappropriate techniques of woodcutting, the site administration carried out works that seriously affected the monument, like driving heavy machinery inside the site and letting trees fall down over its walls.

The management fails, the lack of a management plan, the inability to raise funds, the lack of transparency and openness to the public, and the absence of communication with civil society make this management mechanism ineffective.

Fig. 4: Sarmizegetusa Regia: A tree collapsed and fell on the ancient wall during woodcutting works carried out by the site administration.

Drone photo: Agent Green, February 2018



Fig. 5: Sarmizegetusa Regia, the main entrance to the fortress affected by heavy machines during woodcutting works. Left: February 2018

drone photo by Agent Green; right: October 2018, photo Aurora Pețan

The Hunedoara County Council would like to take over the management of the other four fortresses in the county as well, and to apply the same management system as at Sarmizegetusa Regia, considered by them „a successful model”. However, we consider that this model needs decisive improvements before being applied to the other monuments. Furthermore, the sixth fortress, located in Alba County, would be left outside this project.

In our opinion, a better solution would be a common management scheme for all six fortresses, with a shared vision but with individual strategies for each fortress, coordinated and controlled by the Ministry of Culture and applied by the local administrations of the two counties.

Unreported and false data

Despite numerous problematic interventions in the WH Property and its buffer area, the WH Committee has never been informed about the state of conservation of the property. We could mention at least the building of a parking lot in front of the main entrance to Sarmizegetusa Regia in 2011, which was made using bulldozers, without any authorization or archae-

ological surveillance, leading to the destruction of a sector of the site.

Moreover, the Periodic Report (Second Cycle, 2014) for this WH Property contains a lot of false data:

- It claims that there have been six funding sources for the conservation of these fortresses in the previous five years, including international and national donations, although there has been no intervention at all for conservation in the last 20 years.
- It also claims that there are site museums, adequate access routes to all the fortresses, visitor centres, information materials, and transportation facilities: In fact, all of these are completely absent. There is no public transportation to any of the six fortresses, the access ways are difficult (and sometimes even dangerous, as for Bănița fortress, which does not benefit of a path cut out on the slope, and consequently tourists have to climb on the rocks), and the museums and visitor centre do not exist.

On the other hand, the report stresses the presence of a large number of positive factors, non-existent in reality, in comparison to the absence of negative factors affecting the monu-



Fig. 6: Sarmizegetusa Regia, unauthorized bulldozer intervention very close to the ancient wall and to the main gate of the fortress.

Photo: citynews.ro, 2011



Fig. 7: Sarmizegetusa Regia, a partially collapsed wall.

Photo: Aurora Pețan, 2018

ments. According to the report, the balance is ten to one, the negative factors being mentioned only as a possibility. In fact, many of the positive factors reported are non-existent (housing, major visitor accommodations, interpretative and visiting facilities, land conversion, forestry, etc.), while the omitted negative ones are very real: grazing of domesticated animals, forestry/wood production, relative humidity, temperature, water (rain), micro-organisms, illegal activities, deliberate destruction of heritage, invasive terrestrial species, management activities, etc.

The report's conclusion is that the WH Property's state of conservation is good, despite the obvious progressive degradation of the sites.

The consequences of these false reports are serious since the data provided has been used by the WH Committee to produce statistics and assessments in order to implement regional strategies. They are also available to WH Committee members and partners as well as to the general public, distorting the results of the analyses in which they are used.



Fig. 8: Cows grazing inside the Fortress Costești-Cetățuie and a deteriorated protection system for a Dacian building.

Photo: Daniel Guță, 2016

Lack of awareness

Presently there is no policy for involving local communities or raising public awareness about the value of this WH Property. Local authorities are not trained properly. Moreover, it seems that also at a central level there is no awareness of the importance of these heritage sites and of the necessity and the obligation to implement an efficient management system to ensure the protection of the Outstanding Universal Value of this property as defined by the World Heritage Convention.

In conclusion, neglect is the watchword for this WH Property in the last decades.

Recommendations

The Dacica Foundation asks the World Heritage Committee:

- To urge the State Party to accelerate the adoption of legislation regarding the management of its WH Properties;
- To request the State Party to establish a management mechanism and body for the entire property, as it has become evident that the existing management system for Sarmizegetusa Regia is not functional and adequate for such a complex area and for all six monuments;
- To ask the State Party to ensure the transparency and public participation in all assessments and to work according to the requirements of the World Heritage Committee for involving local communities and civil society organizations as key partners in managing the property;
- To recommend the State Party to invite a Reactive Monitoring Mission for the inspection and evaluation of the State of Conservation of the Property.

The State of Conservation of Osun Osogbo Sacred Grove as of December 2018

Musa Oluwaseyi Hambolu, University of Jos

The Osun Osogbo Sacred Grove in the south west of Nigeria was inscribed into the World Heritage list in 2005 under UNESCO cultural criteria 11,111 and V1. The grove is undisturbed matured rain forest vegetation, dissected by the majestic meandering Osun river. It is the abode of Osun, 'the goddess of fertility'. It consists of, and embodies, rich historical, traditional, religious, spiritual, architectural and artistic values of cultural significance and universal values. It is a symbol of traditional Yoruba practices among the Yoruba ethnic group in Africa and in the Diaspora.

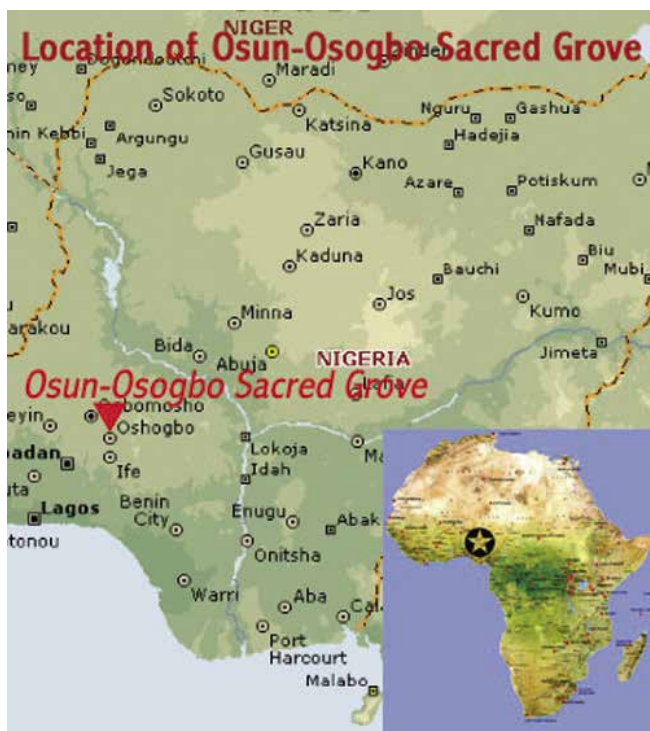


Fig. 1: Location of the Osun Osogbo Grove WHS. Source: www.africanworldheritagesites.org

The site has distinct but interwoven components namely, the matured rainforest, the Osun River, the ancient palace, shrines for different deities and scores of interpretive mud sculptures of Yoruba gods. All these are in active use by devotees, curated by traditional and modern experts and appreciated by visitors to the site. The community's traditional responsibilities and cultural rites are exercised through the King (the *Ataoja* and his council) while a constituted management committee comprising of various stakeholders formulate policies and carry out ac-

tivities for the sustainable management of the site. The site has become an inimitable symbol of traditional relationships and worships of different deities where traditional activities are performed daily, weekly, monthly and annually for consultations and appeasements.



Fig. 2: Internal Entrance.

Photo: www.africanworldheritagesites.org

Management Plans

Three consecutive management plans have been framed under eight objectives, with the overall aim of optimizing World Heritage protocols for the site and enhancing its benefit for the rightful owners, stakeholders and the entire world. Plans are beautiful, but they remain just that if funds and capacity to implement them are lacking. The Third Management plan has in it all it takes to manage Osun Osogbo Grove properly and rectify or at least ameliorate the challenges. However, as Adedayo (2016) observed, funding for the execution of different plans has dwindled in the past five years, thereby constituting a major clog to the wheel of progress.

Monitoring

The site has been subjected to various periodic and reactive monitoring which has brought out the weaknesses and challenges in operationalizing the World Heritage site. Fourteen (14) weaknesses and challenges were identified as at 2016 and still extant as at 2017. They can be grouped into challenges of funds, lack of capacity to execute plans, in adequate commun-

ity engagement, weak legal framework, inadequate research and communication of value of the site to the public.

What is required to be done to address these challenges has been eloquently articulated in the 2017 report of Adedayo which bear repeating here in a condensed form: the need to focus on sacredness and sanctity of the grove which was the hallmark of its protection and preservation in the olden days; the need for the community, National Commission for Museums and Monuments (NCMM) and UNESCO to recognize the roles of devotees and worshippers of different deities in the grove by providing a stronger platform for benefit sharing; creation of solid participatory management systems; and sustaining the use of traditional methods of preservation and restoration to save the tangible heritage and physical contents of the grove. This is imperative as many of the sacred structures can be restored by the devotees only.



Fig. 3: Shrine structure in need of maintenance.

Photo: Musa O. Hambolu

December 2018 Field Trip

In the course of this trip, I examined these challenges confronting the site (against the background of WHC Decision 41 COM 7B.70) under the subheadings of challenges of funds, capacity of managers, site infrastructure, community engagement, legal framework and communication of the value of the site with a view to understanding and documenting how they have impacted the site. I had extensive discussions with staff of the National Commission for Museums and Monuments, traditional craftsmen at the site, some devotees and the Chairperson of the Aduni Olorisha Trust. I made enquiries concerning the perception of youths concerning the site. I had discussions with the two previous site managers and the current one. Reports and publications were generously made available to me by the Management of the National Commission for Museums and Monuments. Photographs of the principal tangible features of the site were taken as a way of documenting the state of the site as at December 2018.

My Observations

On over-commercialization of the August Festival: What has been seen as 'over-commercialization' manifests principally in

the mounting of billboards that are considered invasive. As of December 2018 most of them have been removed and those remaining are on the route to the site and at the entrance. It is worth noting that this issue needs to be understood in the context of a poorly funded heritage site. To be noted is the fact that participants at the festival do not pay entrance fees. Yet they constitute about 75% of the total annual visitors to the site; therefore there is a need for sponsors who of course demand visibility. I am of the opinion that pending the availability of other sources of funding we have to live with an arrangement that enables the community to get support from these sponsors for the conservation work necessary at the site and entertainment of the Ataoja's guests during the festival.



Fig. 4: Discussion with site staff.

Photo: Musa O. Hambolu

Uncompleted Pavilion: This project is being undertaken by the Osun State Government. The delay in its completion is indeed a drawback for the site. It is however hoped that the newly-elected government would expedite action to enable its completion in conformity with the approved plan.

Uncompleted Restoration of Sculptures: This is a source of concern. The Aduni Olorisha Trust would need more substantial help in the herculean task of preserving the mud sculptures, traditional walls, gates and shrines. The sort of budget they require ought to be recurrent, thereby enabling quick intervention when necessary.

The Bisecting Road: More time and resources are required to complete the alternative route before the road can be finally closed. It is to be noted that the current reality is that articulated vehicles no longer use the route because of the state of the bridge. It is also important to suggest that the final closure needs to be handled carefully to avoid a degeneration into serious conflict with those who use it as a route to their source of livelihood. We can only hope that the Osun State Government would live up to its promise of providing an alternative route as soon as possible.

Recommendations

There is a need to increase the awareness of the general population on the importance of the site beyond the August festival,

a need to improve participation in decision-making processes, a need to facilitate cultural activities related to world heritage to capture a more diverse patronage for the site, and facilitating training of professionals, while at the same time sustain and maintain the traditional craftsmen. Evolving a stakeholder governance framework is a task that must be done. They must be made to understand what has to be done to guarantee sustainability of the Osun Osogbo Grove.

Conclusion

There has been progress in reconciling conflicts of interest of different stakeholders and it is worthy to observe that the working relationship among them has improved. The staff of the site demonstrated keen commitment to the execution of tasks assigned to them. As they are, however, hampered by lack of funding for their projects, one cannot but call for support for them. A World Heritage status for a site is not an end in itself, rather it is an opportunity. It processes for attaining the goal of optimizing the potentials of such sites for the benefit of mankind. Though the Osun Osogbo Grove is not in danger, the benefits of its being a World Heritage site is yet to be optimized.



Fig. 5: Mud Sculpture.

Photo: Musa O. Hambolu

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The Need for a New Campaign to Save Carthage

Oumaïma Gannouni

The Archaeological Site of Carthage is an ensemble of Punic, Roman, Vandal, Paleo-Christian and Arab archeological components inscribed to the World Heritage List in 1979 under criteria (ii), (iii) and (vi) [1]. The site currently faces major risks having to do with a number of issues affecting it directly and indirectly.

The property lacks a comprehensive management plan and clear roles for the bodies directly responsible for it. The property and its management, protection and promotion efforts showcase an unfamiliarity with the UNESCO status and what it entails. The property lacks a serious protection of its components as well as its physical structures. It additionally suffers from physical degradation caused by a lack of water drainage, proper ventilation and the effects of commercial and other uses of the components.

On the 19th of May 1972 the UNESCO Center's then Director René Maheu announced that "Carthage must be saved" [2]. Following this plea an international campaign to save Carthage was launched in 1973 with the participation of Eighteen Archeological missions from twelve countries [3]. Today the site is entrusted to the Ministry of Culture through its National Heritage Institute (INP) and the Agency for the Development of National Heritage and Cultural Promotion (AMVPPC). The following observations and photographic evidence demonstrate the need for a new campaign to save Carthage starting with some practical aspects that, once dealt with, can lead to a revived interest in further research and conservation work in the area. This campaign needs to account for urgent managerial and conservation issues. The site's degradation is only escalating. The local inactivity is aggravating the issues beyond repair.

The urgent need for a comprehensive management plan

The main responsible bodies for the Archeological site of Carthage are the National Heritage Institute and the Agency for the Development of National Heritage and Cultural Promotion. The INP is mainly tasked with research and conservation whereas the Agency is meant to manage the property, promote it and use it for commercial purposes. However, the Agency's initial intended role of allocating financial gain into focused

activities that could contribute to the property's physical conservation and protection seems to be lost. Today the Agency's presence is somewhat ineffective, physically and financially. The site lacks proper and updated signage, an effective management plan, proper care and protection from visitors, from neighboring inhabitants and at times from its own guards.

On the other hand, the INP has a representative in Carthage that is supposed to represent it and assume the Institute's direct presence and oversight over the different components. This role is very important because it is meant to ensure a smooth and regular transfer of information with the INP and a direct collaboration and engagement with the Agency. Somewhere between the Institute, the Agency, the Municipality of Carthage, the politization of the position of the Conservator, the different roles and personnel distributed between several offices in Tunis and Carthage, a comprehensive collaborative management plan seems nonexistent.

It is recommended that the INP and the Conservator of Carthage work more closely to ensure a good flow of information, an actual management of the site and possible urgent conservation/reinforcement work. The INP and its conservator need to involve all the direct stakeholders without the interference of any individuals not working on the site today. The success of the Plan pro la Protection et Mise en Valeur (PPMV – Protection and Enhancement plan) is contingent upon the participation of the INP, the Agency, the Municipality of Carthage, Tunisia's representatives to the UNESCO World Heritage Centre and their pledge to collaborate together in the future. Political will is finally needed to ensure the reinforcement of the property's boundaries, buffer zone and Protection and Enhancement Plan. Additionally, it is recommended that the Ministry of Tourism advises and supervises the overall mission and functions of the Agency since it plays an important role in national tourism.

Recommendations based on the State Party's State of Conservation Report:

A lot of the points addressed by the UNESCO World Heritage Centre are often not directly or properly addressed by the

State of Conservation Reports submitted by the State Party. Addressing these points is very important to the survival of the Archeological Site of Carthage. Based on similar historical issues related to the State Party's State of Conservation Report and some unclarity in several points, I recommend the following:

- The State Party is encouraged to reply to the Centre's decision paragraph by paragraph as noted in paragraph 169 of the Operational Guidelines. Also following the said paragraph for the format for the submission of the State of Conservation Report by State Parties, it is highly encouraged that the report carries the signature of the submitting authority.
- The report is encouraged to only reference official sources concerning information under its legislation.
- The drafting of this report should involve the direct stakeholders and be produced by them. Same recommendation goes for the drafting of the PPMV.
- It is recommended that data given should specify whether it concerns the INP alone, or that along with the Agency.
- The INP should clarify its role and extent of involvement in bilateral excavation and conservation efforts mentioned in State of Conservation Reports.
- The report mentions that 57 dossiers were submitted to the consideration of the INP for building plans but does not specify the extent of the findings nor does it specify the reasoning behind the periods given to archeologists for excavations.

General recommendations for the property:

After an assessment of the property's components and several on-site interviews, I propose the following actions to alleviate a number of other pressing issues and threats:

- Carthage should have a body regularly inspecting the components of the property for possible violations by private persons or as a result of miscommunications with the Municipality.
- Physical reassessment of the property along with the gathering and publishing of different material on each component is recommended. This will allow for growing interest in further studies on the property locally and internationally.
- The budget of Carthage should be more structured and provide stable and fair sums for its different missions and personnel so they can properly perform their tasks without harming the property or participating in illicit activities.
- Prohibition of smoking (Acropolium in particular and all open components) and open fires (night guards and especially the inhabitants near the Roman Amphitheatre in Hay Mohamed Ali).
- The conservator of Carthage and the Municipality should not rent/give permission for use of the components of the property for events which are assumed to cause it irreversible damage (such as the celebration of the 100th year of a football team in the Amphitheatre).

Carthage's issues have often been addressed by the Centre. The failure to address these points has to do with communicating

the Centre's recommendations to the stakeholders and having them draft and submit the report in collaboration. The site lacks a protection, management and promotion plan along with a marked physical designation of its boundaries. The INP seems to be aware of certain requested actions but still the reports fail to address the entirety of the recommendations, starting with the designation of effective roles to those directly responsible for the property.

I think that once the recommendations are studied and addressed, Carthage can start to see a future. Swift action along with the restructuring of the direct stakeholder's roles, goals and what they must prioritize with their budgets are urgently needed at this time considering the current state of the archaeological ensemble.

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Fig. 1: Map of Carthage indicating the documented locations.

Map: Martin Lenk / Oumaima Gannouni

Physical degradation and misuse of the Archeological Site of Carthage – A photographic documentation

Photos © Oumaïma Gannouni

The Punic Port's shoreline continues to be used by boats with engines and invasive structures



The Roman Circus is used as a dumpster. New structures are being erected at the moment.



Tophet's underground section needs maintenance. Excavation structures present a nuisance to the visitor experience.



a) Mismanagement of the Antonin Baths



b) Water accumulation and mold threaten the structures



Inadequate conservation attempts and reliance on improper long-term temporary structures in the Roman Theatre



The Amphitheatre needs a different surveillance and law reinforcement system altogether



The Basilica is hidden among vegetation from the public by the side of a main road. Site in need of proper conservation and promotion



Ancient Thebes with its Necropolis: A Reactive Evaluation of the Eastern Part of the World Heritage Property

Eman Shokry Hesham

The modern city of Luxor in Upper Egypt includes an important part of one of the most ancient capitals in the world, Thebes. The eastern part of the World Heritage Property “Ancient Thebes with its Necropolis” is located on the east bank of the River Nile of Luxor, while its Necropolis is located on the west bank. The eastern part of the World Heritage Property includes the Karnak Temple Complex which was dedicated to the worship of the Theban Triad (Amun, Khonso, and Mut). This complex is considered one of the biggest and greatest sacred complexes, which includes chapels, pylons, temples and a sacred lake. The World Heritage Property includes as well Luxor Temple to its south, which served as the place for the rejuvenation of kingship.

These two establishments were connected in ancient times by the Processional Way (also referred to as the Sphinx Avenue). It was used as an inseparable part of the complete huge complex of Karnak and Luxor in the annual Opet Festival, during which a barque shrine was carried from Karnak to Luxor Temple in a ceremonial procession. Much research was conducted about the history of the Processional Way, its importance to the historic Opet Festival, and the different additions and decorations made by different kings along the ancient times.

The World Heritage Property which is dated back to the second millennium BC, however, is located in a modern city that has more than 200.000 inhabitants. Luxor city struggles to protect and benefit from the World Heritage property being on its land, and at the same time, faces huge development challenges.

This paper focuses on the situation which has emerged as a result of unearthing the Processional Way, which currently is still located in the Buffer Zone and should be added to the World Heritage Property.

The Necessity of a Retrospective Inventory

The Processional Way should not be dealt with in separation from the World Heritage Property. It reflected the sacred landscapes conception in Thebes, as it connected Karnak and Luxor temples during the Opet Festival. It constructed a symbolic relationship between Karnak, as the main “house” of Amun, and the Luxor Temple, as the main “house” of the creator and the

Ka, which held the life force of the king. Historically, most of the statues or sphinxes which have been brought again to light are a relatively recent addition (fourth century BC) compared to the temples.

The excavation of the Processional Way started over a century ago. Like Luxor temple, most of its parts was submerged under accumulated mud as a natural consequence of seasonal Nile floods, or was hidden under later constructions of the city in the last 200 years (Fig. 1). Slowly in time, the Processional Way had been unearthed until this year (2018), when the last small part of it, which served as a link between the eastern and western parts of the city in the south, was cleared. The excavation took that noticable long time due to the fact that the location of the Processional Way is where parts of the modern city exist. This long way (almost 2 km) unfortunately became a barrier between the two parts of the city (Fig. 2). Despite its archaeological importance, the city governorate constructed two bridges to relink the city.

The Processional Way needs urgent protection measures. Being still closed to touristic visits, and a huge area that is below the current street level, it becomes vulnerable to neglect and deterioration. My previous report (Shokry Hesham 2018) showed different threats to the Processional Way in pictures and indicated the two Mathan and Airport bridges on a map.

The State Party of Egypt (its Ministry of State of Antiquities), is hence advised to prepare a proper updated Retrospective Inventory of the World Heritage property, with the Processional Way included, to improve the protection of the whole WH site. It is therefore required to create a clear delimitation of the property. While it doesn't have a negative impact on the World Heritage Property and its OUV other than the improvement of the whole World Heritage property and its protection, it is considered as a Minor Boundary Modification according to Paragraphs 163 and 164 of the Operational Guidelines. A revised Retrospective Statement of the OUV is hence expected to incorporate the Processional Way and its role to the whole complex.

Fig. 1: Aerial Views of Luxor City Before and After unearthing the Processional Way, and Demolishing the South Link Between East and West.

Maps adapted from Google Earth 2018



(1) Luxor City (east bank) while most of the Processional Way was unexcavated (2002)



(2) Luxor City after unearthing the Processional Way (early 2018)

The Last WHCOM Decision (41 COM 7B.76)

Beside the OUV, the last WHCOM Decision highlights the issue of lack of management strategies, policies, and long-term plans for Ancient Thebes with its Necropolis. The latest (available) State of Conservation Report (2015) highlighted some restoration activities in Karnak and Luxor temples, while no protection measures, management plans or technical resources were provided. The last Decision requests an integrated management plan for the property. This management plan should include a comprehensive tourism management plan, and a conservation plan.

The two constructed bridges form a threat to the parts of the Processional Way over which they are constructed. It is clear that they also impair its visual integrity and interrupt the continuity of the historic image of the Processional Way. An Heritage Impact Assessment (HIA) is urgently needed to study their negative impacts, and possible solutions to relink the city without harming its Integrity and its OUV.

Conclusion

The Processional Way (also known as the Sphinx Avenue), is an inseparable part of the World Heritage Property; Ancient Thebes with its Necropolis. It was built during the era in which the ancient Egyptian complex of Luxor and Karnak temples were functioning and serving as a sacred landscape, and had complemented and witnessed, as a sacred link, the royal and cult ceremonies during ancient times. Recently after unearthing its remaining hidden parts, the Processional Way should be considered as a vital attribute to the Integration of the property and as a contributor to its Outstanding Universal Value (OUV).

According to the Operational Guidelines, Paragraph 163, the State Party, Egypt's MSA, is highly recommended to conduct a Retrospective Inventory, and request a Minor Modification to the Boundaries of the World Heritage Property on the east

bank, to incorporate the unearthed and excavated parts of the Processional Way between Luxor and Karnak temples within the World Heritage Property, instead of being currently within the buffer zone.

This modification is urgently recommended, given the poor conservation situation in the excavated parts of the Processional Way. The World Heritage property title will provide much more restrictions on uncontrolled construction developments and will require urgent protection measures by the State Party.

Therefore, the next Reactive Monitoring Mission to the World Heritage property is extremely encouraged to visit the World Heritage Property for the evaluation of a minor boundary modification proposal.

According to the last WHCOM Decision (41 COM 7B.76) note 8, Paragraph 172 the Operational Guidelines, and the previous four notes, Egypt's MSA is urgently requested to conduct an integrated management plan. It should include necessary measures to control the vehicle traffic over and around the Processional Way.

On the other hand, given the fact that the Heritage Property on the east bank is located within the modern city of Luxor, proper and careful social and urban solutions should be provided. The community is in urgent need for a third bridge to link the east and west parts of the city. A Heritage Impact Assessment (HIA) is therefore the best tool to study the possibility and the consequences of new infrastructure projects within the World Heritage Property and its buffer zone, as recommended in the World Heritage Watch Report 2018. Being an inevitable social construct of the Heritage Property and its buffer zone, the civil society should be consulted about the best solutions in this matter, as it affects the quality of life of the local community in Luxor city. The possible solutions and final decisions, however, should not harm the integration of the WH site and its OUV.



(3) Luxor City after demolishing the South link which led to Luxor Train Station (late 2018)



(4/5) Before (early 2018) and after (late 2018) demolishing the south path that linked Luxor Train Station with the western part of Luxor city

- 1 Processional Way
- 2 Youssef Hassan street (to Luxor Train Station)
- 3 Ma'bad el Karnak el Bahari Street (to the Corniche)



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Talgar World Heritage Site is Under Threat

Submitted by Green Salvation



Fig. 1: Location of the Talgar Site in a southeastern Kazakhstan.

Maps: a) Green Salvation, b) www.uzngos.uzsci.net

In 2014, the ancient settlement site of Talgar was included in the World Heritage List as a part of the joint nomination of China, Kazakhstan, and Kyrgyzstan: Silk Roads: the Routes Network of Chang'an-Tianshan Corridor. Talgar site is one of the eight Kazakhstan sites included in this nomination.¹ It is located 25 km east of the city of Almaty, in the protected zone of the Ile-Alatau National Park.

Description of the problem

In the fall of 2014, a group of Chinese experts decided to inspect the sites located in Kazakhstan, including the site of Talgar. Imagine the surprise of the Chinese who saw a bridge being built to the center of the ancient monument from the west bank of the Talgar River, and having markings which were made across the monument for construction of a highway to the Ak-Bulak ski resort. A scandal broke out. It turned out that as a result of inconsistency of actions between various governmental agencies, the process of inclusion of the site into the World Heritage List was happening at the same time as the road construction project was being developed.

On March 18, 2015, Deputies of the Mazhilis (the National Parliament) sent a request to the Prosecutor General's Office with a request to clarify the situation around the Talgar site and conduct an inspection. On April 17, 2015, the Prosecutor General, responding to the Deputies, indicated that "at the present moment, construction works have been suspended

along the proposed road passage strip, archaeological surveys are being conducted, and conclusions will be submitted for approval to the Ministry of Culture and Sports."²

In the summer of 2015, archaeological pits appeared on the site slicing to the base its rampart in two places, compromising the integrity of the monument. In place of the corner tower which was destroyed during the digging of the pits, Kazakhstani restorers built a new tower out of cinder block. It was erected on a concrete foundation and plastered with cement. At the same time, in a few dozens of meters from the northern wall of the ancient settlement, residential homes were constructed in the protected zone of the monument.

On March 21-23, 2016, at the official request of the Republic of Kazakhstan, a mission of the International Council on Monuments and Sites (ICOMOS) arrived in the country. One of its tasks was to determine the impact of the road construction on the outstanding universal value, integrity and authenticity of the Talgar site.³ The experts of ICOMOS were especially surprised by the conclusion made by representatives of a private archeological company on the basis of excavations carried out on the Talgar site who "found no evidence of a cultural archaeological layer."⁴

ICOMOS experts recommended to urgently declare a moratorium on the construction of the road to the ski resort, develop an alternative that would not affect the ancient settlement and



Fig. 2: Road workers dug out a passage for the roadway through the southern part of the site, destroying a significant part of the monument. October 15, 2016

Photo: Sergey Kuratov



Fig. 3: The bridge construction over Talgar the river. October 15, 2016

Photo: Sergey Kuratov

its buffer zone, and take a decision on dismantling the bridge over the Talgar River. The mission indicated that this was necessary

- to reinforce significantly the control over the implementation of the Law of the Republic of Kazakhstan "On the protection and use of objects of historical and cultural heritage," and bring it in compliance with the terminology and mechanisms of the WH Convention;
- to make changes in the Land Code in order to prevent the destruction of monuments;
- as a matter of urgency, to establish efficient coordination and a harmonization of decisions between the relevant State departments and branches at all levels;
- to halt all reconstruction works at the site which are not based on complete and detailed documentation, and to submit a reconstruction project to the World Heritage Center;
- to use non-destructive research methods on archaeological monuments;
- to declare a moratorium on any further construction in the buffer zone and consider removing new structures;
- to develop a General plan for the buffer zone in order to prevent individual construction projects and to facilitate buffer zone development; and to submit the General plan to the World Heritage Center.⁵

It should be noted that the ICOMOS mission specifically recalled that according to Article 1 of the Law of the Republic of Kazakhstan "On the Protection and Use of Historical and Cultural Heritage Sites," the WH Convention takes precedence over the laws of Kazakhstan.⁶

However, in the summer of 2016 construction resumed after the ICOMOS mission left. A private archaeological company made new excavations along the proposed passage of the road and reiterated that there was nothing valuable at the World Heritage Site. By August, preparation of the road bed reached the south-eastern edge of the hillfort. The lower part of the rampart was cut by a bulldozer, and the soil was dumped on top of the rampart. Fence around the site was broken in several areas.

An attempt of "Green Salvation" to address the court, obtain comprehensive information about what was happening, and raise the question of the inactivity of the Ministry of Culture and Sports, which is directly responsible for the preservation of the site, ended in failure. All courts refused to satisfy claims of our organization.

Decision of the 40th session of the World Heritage Committee (2016)

On its 40th session in July 2016, the World Heritage Committee took a Decision on compliance by Kazakhstan with the requirements of the Convention.⁷ The decision regarding the Talgar site reads as follows:

- to stop immediately the construction of the road through the ancient settlement, to explore other routes outside the boundaries of the Talgar site and its buffer zone, and to dismantle the parts of the bridge that had already been constructed;
- to stop reconstruction works of the settlement which were carried out without careful preparation of reconstruction projects;
- to halt the residential development in the buffer zone and to provide full details on the situation in the buffer zone to the World Heritage Centre.



Fig. 4: The bridge over the Talgar river. September 26, 2017

Photo: Ravil Nassyrov

Destruction of the southern part of the ancient settlement in 2016

Despite the findings of the ICOMOS mission and the decision of the World Heritage Committee, in September–October road workers dug out a passage for the roadway through the southern part of the hillfort, destroying a significant part of the monument. But protests and a campaign organized by the public,⁸ scientists and journalists prevented them from finishing what they started. On October 27, 2016, Deputy Prime Minister of Kazakhstan I. Tasmagambetov arrived at the site. Construction was stopped. The dug-out passage for the roadway was filled with soil and covered with straw on top. Informational boards were installed and the fence was repaired. However, construction of the bridge did not stop.

On November 8, 2016, after the excavation was filled back up, experts of the UNESCO World Heritage Centre and ICOMOS visited the site. They were accompanied by representatives of the Ministry of Culture and Sports, the Institute of Archeology, other representatives of authorized bodies, public and media. In July 2017, the experts published a detailed report on the results of the World Heritage Site Survey in Kazakhstan.⁹

Inquiries of Deputies of the Mazhilis

In February and April 2018, “Green Salvation” sent letters to the Secretary of the Committee on Ecology and Environment of the Lower House of the Parliament, G.A. Baymakhanova.



Fig. 5: Aerial view of the Talgar Site. 1. The entrance group of buildings. 2. Ramp to the bridge from the site. 3. Open road to the Talgar World Heritage Site. 4. Area of the 2018 archaeological excavation. 5. Stream-flooded central part of the site.

Source: Google Maps

The organization asked deputies to make inquiries to the Prime Minister about measures taken by the government to ensure the preservation of the monument.

On January 25 and May 2, the deputies sent two inquiries to Prime Minister B.A.Sagintayev.¹⁰ The government's replies do not state anything about:

- changes that are needed to be introduced to the land and water legislation;
- dismantling of the bridge over the Talgar river;
- plans for the reconstruction and the future of new structures (reconstruction);
- the lack of informational stands on the site;
- what actions are taken to ensure the preservation of the hillfort.

The letter of May 31 says “Currently, in order to ensure preservation and strengthening of the protection of the Talgar hillfort, the Ministry of Culture and Sports is working on transferring the property to the Ministry's branch organization, the Issyk State Reserve Museum.”¹¹

2018 Decision of the 42nd session of the World Heritage Committee

Before the 42nd session of the World Heritage Committee in June–July 2018, “Green Salvation” sent to the World Heritage Centre information on the results of monitoring from 2017 – early 2018.¹² The Committee took a new Decision,¹³ in which it

- notes the decisions to re-route the highway outside all protective zones of the hillfort, and requests to provide Details of the preferred option for the Talgar bypass road, showing the precise route and the location of the new bridge, as well as any areas which are to fulfil the functions of demolished buildings, accompanied by a Heritage Impact Assessment;
- reiterates its request to provide details on the dismantling of the bridge over the Talgar river; mitigation measures to address reconstruction work and illegal, uncontrolled residential developments near the boundaries of the Talgar component site; measures to strengthen the legal, planning and management frameworks of the site and its setting.

Condition of the site in 2017 and 2018

Monitoring of the condition of the Talgar site conducted by “Green Salvation” between 2015 – 2018 showed that no radical changes took place in 2017 and 2018.¹⁴ The boundaries of the World Heritage site as well as its buffer zone are not marked. Construction of residential housing and other structures in the buffer zone continues. The fence of the site was partially renovated in 2018 on the northern and eastern sides. On the southern and south-eastern sides it has partially broken

and fallen down. In some places there is no fence. Still no fencing is installed at the western side. Access to the site from the east is completely open.

The area which was excavated for the road passage and later filled back with dirt, continues to settle. In the spring of 2017 and 2018, huge puddles were formed in the specified area. Since the bridge over the Talgar River was completed in 2018, drivers of off-road vehicles and heavy construction machinery equipped a ramp to the bridge from the hillfort passing through its unfenced part. In 2017 – 2018, livestock grazing continued at the hillfort. In the spring of 2018, new excavations were car-

ried out on the site, as a result of which the rampart was damaged in one more area. In the summer, the entrance gate was repaired. Construction waste generated during the work was dumped on the territory of the monument.

The integrity of the site is threatened by a significant increase in the volume of water flowing through the hillfort. Water flow is eroding the soil and forming huge puddles in the northern part of the settlement and approaches the old excavations. "Green Salvation" will continue to monitor and seek strict compliance with the requirements of the WH Convention by the authorized state bodies.



Fig. 6: Water-flooded center of the site, October 30, 2018.



Fig. 7: Access to the site from the east is fully open. October 30, 2018.



Fig. 8: Tracks of vehicles wheels are seen on the site. December 16, 2018



Fig. 9: The water eroded central part of the site. December 16, 2018.

Photos: Ravil Nassyrov



Fig. 10: Condition of the site near the entrance group. December 16, 2018.



Fig. 11: In front of the bridge on the territory of the site, the hill slope is reshaped for vehicles to pass. View of the site from the west. December 16, 2018

Photos: Ravil Nassyrov

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Civil Society Safeguarding Fort & Shalamar Gardens, Lahore

Imrana Tiwana, Lahore Conservation Society



This is an update/follow up on the status and critical evaluation of threats to the World Heritage Site; Fort and Shalimar Gardens: WHC/18/42.COM/7B.Add.2. This WHS site has been on the WHC agenda for two years, with an ongoing attempt by civil society to safeguard the OUV, authenticity and integrity of the site, which has been under severe threat of 'irreversible degradation' and in direct violation of local and international laws.

Construction of 'New Concrete Structure' for Restaurant at Royal Kitchen Area, Lahore Fort: WHC/18/42.COM/7B.Add.2

The State of Conservation Reports 2017-2019 by the State Party do not mention building a new concrete structure for kitchen and ancillary activities for a fine dining restaurant. It is shocking that there is 'No' mention of the newly constructed kitchen structure even in the SOC 2019.

The ground reality is that the conservation works as per the SOC report are almost complete and a proposal for adaptive reuse of this area for a 'Fine Dining Restaurant' is under implementation including construction of a concrete and masonry structure to house a kitchen/toilets/auxiliary structures which violate the principles of the Convention. This structure has already been built without following due process within the 'Core Protected Zone of the World Heritage Site'. It is at

the same level as the Royal Kitchen and only about 7 feet away from the historic royal kitchen structure, and is therefore illegal.

Our Recommendations

We request the WHC to review the construction and take the following steps to safeguard this WHS:

- The kitchen block under construction in the Royal Kitchen enclave being constructed illegally and in violation of local laws and the Convention, should be 'demolished and removed' to retain the integrity and OUV of the WHS. The restored structure may be used for educational purposes and other light and sound activities, in keeping with the Convention and local laws.

We state this for the following reasons:

- a) The construction is a violation against the Antiquities Act: "No new construction allowed within a distance of two hundred feet of a protected immovable antiquity on, or within a distance of two hundred feet of a protected immovable antiquity shall be undertaken or executed."
- b) Concurrence of the State party and UNESCO has not been obtained.
- c) The new kitchen facility will overburden the already constrained sewerage, water and waste disposal systems due to live cooking as well as added requirements of the staff.



Fig. 1: Historic Royal Kitchen area marked in box: Within the Protected Area of the WHS
Map: Google Earth/Imrana Tiwana



Fig. 2a+b: Large newly-built concrete restaurant structure less than 8 feet away from the historic Royal Kitchen. Left photo: new building on the right. Right photo: new building on the left.

Photos: Imrana Tiwana

affecting the Outstanding Universal Value' consisting of 14 primary factors. A few relevant ones are:

Major visitor accommodation and associated infrastructure: Major accommodation and associated infrastructure (hotels, restaurants, golf courses, ski resorts, etc.). Transportation Infrastructure, Utilities or Service Infrastructure, Water: Development of infrastructure for energy utilities, gas, electricity and water, sewerage works, power lines/easements/pipelines pollution, inputs of heat and light that disturb ecosystems. Social/ Society's Valuing for Heritage: Changes in values leading to new uses of heritage resources. Expansions of/ additions to current uses of heritage resources.

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.

- d) Transportation for kitchen supplies and removal of solid waste will introduce further pollution at the heritage site.
- e) Maximizing the usage of the historic property through select dining. The danger is impact of over visitation rather than under-utilization.
- f) Commercializing Fort premises by setting up a special dining facility degrades the cultural value of the World Heritage property.

Article 6 (3) of the WH Convention states: "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 make a restaurant in the Protected Core Area of the Royal Kitchen, Lahore Fort is a deliberate measure that poses a serious threat to the integrity and authenticity of the property. This intervention directly undermines the value of the Lahore Fort and it directly and irreversibly damages the archaeological and architectural works and its historical Outstanding Value. The Operational Guidelines for the Implementation of the World Heritage Convention expressly state that there should be legal protections to protect the property from economic changes that negatively impact the Outstanding Universal Value.

Within the framework of the revision of the questionnaire of the 'Periodic Reporting Exercise (Section II)' in 2008, the World Heritage Committee adopted a standard list of 'threats/factors

affecting the Outstanding Universal Value' consisting of 14 primary factors. A few relevant ones are:

We take serious notice and object to the statement of the



Fig 3: Interior of the new concrete construction for the kitchen / ancillary activities for a new restaurant.

Photo: Imrana Tiwana

Director General of the Walled City Authority who informed the Department of Archaeology that: "A separate reversible structure located at a former site of a building built during the 1990s has been erected below ground level in an archaeologically insignificant area, to provide kitchen and toilet facilities. State of the art drainage arrangements and other infrastructure services are proposed to service this previously neglected section of the Lahore Fort.

This is quite clearly ‘not a reversible structure’, and this is not an ‘archaeologically insignificant area’. It is clear as per the Convention and local laws that such additions cannot be made in such close proximity to the historic Royal Kitchen structure which is an integral part of the Lahore Fort WHS.

Ms. Yasmeen Lari states “As World Heritage Sites’ UNESCO National Advisor (2003-2005) and as co-author of UNESCO Lahore Fort Master Plan 2006-2011, and one who has studied extensively various aspects of the World Heritage Site, I respectfully submit my strong objection to the kitchen block under construction located in the protected Core Zone of the historic property and the conversion of the historic Royal Kitchens as a dining facility.”

The above case is a serious transgression in following the principles of the Convention, its Operational Guidelines and adherence to local laws, and is therefore ‘unacceptable’. It further proves that a formal mechanism to include Civil Society is necessary to ensure that the WHC and its Advisory bodies have access to ‘Objective, Neutral & Transparent Information’, thereby strengthening the ideals of the Convention and safeguarding our collective heritage.

The Orange Line Metro Train Project

In accordance with Decisions 40 COM 7B.43 and 41 COM 7B.96 adopted by the World Heritage Committee at its 40th (Istanbul/UNESCO, 2016) and 41st (Krakow, 2017) sessions respectively, a joint World Heritage Centre/ICOMOS Reactive Monitoring Mission visited the World Heritage property “Fort and Shalamar Gardens of Lahore” from 23 to 28 April 2018, despite the fact that the Reactive Monitoring Mission has been delayed since 2016.



Fig. 4: Irreversible visual damage to the OUV.

Photo: Altamash Saeed

General Conclusions & Recommendations RMM

The Reactive Monitoring mission to the property, initially requested by the World Heritage Committee in July 2016, could only be carried out from 23 to 29 April 2018. During the two-year period, the objectives of the mission would have changed from “proposing an alternative solution” to assessing the

overall impact of the project on the OUV of the property. The mission also notes with concern that the Orange Line Metro Project (OLMP) was planned in 2007 and implemented in summer 2015 without details being provided. *The RMM observed that in the future it is envisaged to include a violations act to ‘develop a law for the district government which restricts building and infrastructure developments in proximity to World Heritage properties.’*

SOC Report 2019 Appraisal

The SOC Report 2019 establishes that studies are being conducted, however it disregards, overlooks and incorrectly states some of the facts on ground. It is critical that due respect be given to the RMM decisions to establish and reinforce the professional and technical authority of this exercise. Some of the statements given in the 2019 SOC Report are in direct contradiction to the observations and decisions of the RMM and the WHC.

Proposed Studies and ToR’s: Critical Evaluations

Although the SOC Report states that relevant studies are being conducted, it is important to place them within the parameters of the law and within perspective and reference to context, misleading perceptions may not supersede the law, it is suggested that further evaluations may take the above into account for safeguarding the integrity of the convention and to ensure that State Parties do not use whitewashing and distortion of reality. The State Parties must be accountable to upholding the law and giving factual information. In response to Decision 4 of the WHC, the SOC Report 2019 states that civil works for OLMP construction in front of Shalamar Gardens have been completed without compromising authenticity and integrity of the Property, whereas the RMM confirmed the adverse impacts on the OUV and damage to its authenticity and integrity, and acknowledges that the pillars of the viaduct less than 8 feet away from the Hydraulic Tanks, that no meas-



Fig. 5: The trees planted by the government are negligible and will not be an adequate or good mitigation measure. This stretch of the GT Road should have a 2-way vehicular underpass, and the area above be made into a strong green buffer and pedestrianized zone linked to the Hydraulic Tanks across the road. Photo: Altamash Saeed

ure can eliminate the negative effect on them. The RMM states the following:

“The current Reactive Monitoring Mission therefore confirms the highly adverse impact of the ongoing construction work of the Metro Line on the property’s OUV, and notably (i) the damage to its integrity and setting; (ii) the destruction of the archaeological remains of Mughal era brickwork/structures that were likely part of the Shalamar Gardens’ hydraulic system and connected to the Inayat Bagh, a extant Mughal pavilion; (iii) adverse visual impacts; (iv) increased air pollution; (v) high levels of noise and disturbance at this Mughal masterpiece of creative genius.”

Our Recommendations

The SOC Report states: “Further, the State Party has developed a green area with trees and when these trees will grow to its full height, it will form a natural “mask” for the newly-constructed Orange Line Metro Train Project.”

We firmly uphold that the elevated viaduct has caused irreversible visual impairment and damage to the OUV, integrity and authenticity of the WHS. We fully endorse and support the 32 point detailed directions of the RMM. RMM recommendations for implementation should be practical as far as possible keeping in view technical social and ground realities.



Fig. 6: This portion of the road in front of the main Shalamar Garden entrance should have a Two-Way Underground Vehicular Bypass. Photo: Altamash Saeed

RMM recommendations #1, 2, 5, 6, 7, 8, 10, 11 & 12 all relate to the impact of the traffic & infrastructure of GT Road and periphery roads on the historic Gardens. The proposal as recommended by the RMM of moving the GT Road further towards the south will result in displacement of a very large residential population and appears not a viable socio-economic solution. We recommend the following:

- The environmental and noise pollution generated by the traffic is damaging to the WHS, it is recommended that a ‘two-way underground vehicular bypass for traffic’ should be constructed between the Metro station and the Mint

station under the current GT Road. The land above the underpass in front of the Garden should be converted into a pedestrian green space, to avoid traffic, noise and pollution, the hydraulic tanks should be incorporated within this space for visitors at the original historic level.

- A detailed survey of the area for vehicular traffic management should be carried out to design this underpass and also consider the lowering of the peripheral roads in order to provide a pedestrian access to the original Eastern and Western gates and move the vehicular traffic to the surrounding streets. It was agreed that the Eastern Gate can be easily be opened by providing a pedestrian access from the Niqar Khanna as there are very few vehicles plying on this route.
- The parking area in front of the Niqar khanna should also be taken underground.
- Recommendations related to Points # 3 & 4 relate to mitigate the noise due to traffic and train, if the above mentioned point was implemented this action may not be required.
- Recommendations related to Points 16, 17, 19, 20, 21, 22 & 23 relate to the buffer zone
- To ensure that violations in the buffer zone are restricted and all encroachments and developments are monitored as per regulations and laws.
- Recommendations related to Points 29, 30, 31 & 32 All actions that proposed on a World Heritage site should be in accordance with §172 of the Operational Guidelines, and it is the responsibility of the Department that it should ensure that any development works that are undertaken are evaluated and assessed by the Department to ensure they are in line with the ICOMOS guidelines. The Department must keep the UNESCO and ICOMOS informed of the proposals prior to implementation as per recommendations of the decisions taken in WHC42 (2018).

It is imperative to note that the purpose of this update is to put the record straight and place the facts and ground realities and laws on the table. It also attempts to ensure and maintain the dignity, credibility and professional excellence of the WHC, Advisory Bodies, RMM’s and proposes that they interact not only with State Parties, but that an effective mechanism be introduced to include the voice of civil society. This will ensure a balanced, more empowered, neutral and inclusive assessment at all levels of intervention and decision making to protect and safeguard our collective world heritage. We appreciate and acknowledge the Decisions of the WHC, regarding the Fort and Shalamar Gardens in Lahore (Pakistan) (C 171), in particular Decision: 42 COM 7B.14.

The Makli Monuments and the State Party's Responses to their Preservation



Zulfiqar Ali Kalhoro, Pakistan Institute of Development Economics (PIDE)

The Makli monuments are matchless for their architectural marvels in Pakistan. This treasure trove reflects the glorious architectural history of Sindh left behind by the many rulers of Samma (1350–1524) (Fig. 1), Arghun (1525–1555), Tarkhan (1555–1592), Mughal (1592–1737) and Kalhora (1737–1783) dynasties. The Makli necropolis received global recognition when it was enlisted as UNESCO World Heritage Site (Dani 1982, Lari 1997; Zajadacz-Hastenrath 2003).

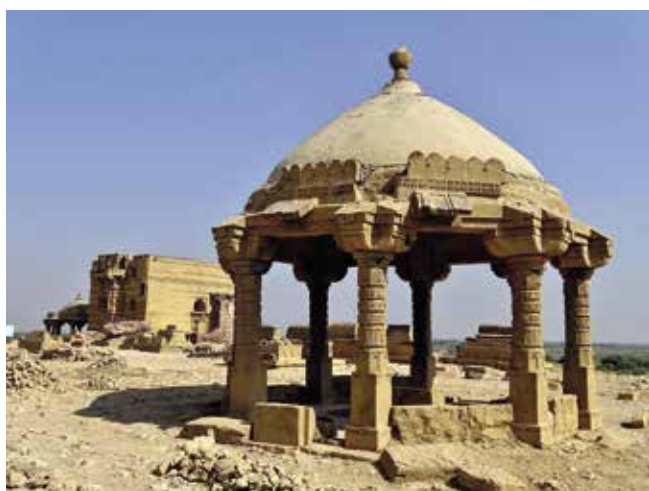


Fig. 1: Stone Canopies in the Samma cluster on Makli Hill. Photo: Zulfiqar Ali Kalhoro

In response to queries by the World Heritage Committee in the meetings held in Krakow 2017 and Manama 2018, the State Party, through the Government of Sindh, has taken some serious steps. This paper will discuss what various steps have been taken by the government of Sindh in response to World Heritage Committee recommendations to safeguard the Makli monuments.

Last year, the State party introduced a shuttle service to facilitate visits of the site. The launching of a zero carbon shuttle service protected the monuments from environmental threats. This was a very useful initiative by the Department of Culture, Tourism, and Antiquities, Government of Sindh. This shuttle service still continues. It has a double advantage: First it greatly benefited the tour-

ists and visitors to use the shuttle service, and secondly, taking the advantage of this service the administrator stopped the entry of all vehicles into the Makli graveyard. All private and public transport has been banned by the State Party. The vehicles are parked outside the gate. The tourists either use the shuttle service or walk to the monuments.

Positive steps have been taken by the State Party. One of the most difficult things was to erect a boundary wall, in which the State Party has finally succeeded. They actually succeeded in convincing the local community who had occupied the Makli land illegally. After convincing the community, the boundary wall work was started in June, and almost 60% boundary has been completed (Fig. 2). The remaining work should also be completed which may take some time as the State Party lacks funds to continue with the project. Once the funds are readily available to the State Party, it is certain that the boundary wall will be completed by this year, otherwise it may take some more years. However, it should be admitted that it was not easy to convince the local community to agree to the boundary wall because they had to vacate the land. This was the most difficult task which the State party has done.

Another positive step taken by the State party is that they have constituted the committee to monitor the festivals which are being held at the shrines. There are more than 20 shrines where people frequently visit. During festivals (melas) the pilgrims used to damage the historic tombs the most. But due to constant monitoring by the security guards, vandalism has dwindled. The



Fig. 2: View of the boundary wall of the Makli necropolis under construction. Photo: Zulfiqar Ali Kalhoro

administrator of Makli who is a representative of State Party has also banned communal cooking in the premises since the pilgrims used to cook near the shrines thus damaging other historic monuments. This has totally been banned by the administrator of Makli. The security guards are vigilant to check on those professionals who put advertisements on the walls of tombs. It was common practice at Makli that people used to post their advertisements on the walls.

The State party is also striving to stop new burials. The site boards have been installed giving brief information about the monument and the buried dignitaries. But it is also suggested that leaflets or brochures should also be published about the famous monuments on Makli Hill. The majority of tourists read the information on the site boards, but they don't have enough space to provide all the relevant information about a monument, its importance highlighting the distinctive architectural features, and the importance of the buried dignitaries. What I suggest is to publish small booklets about all important monuments which should be kept at the Makli museum.

Last year crack monitors were installed in some monuments. In December, 2018 digital crack monitors have also been installed in the tomb of Jam Nizamuddin. But there is need to install more crack monitors in more monuments.

Despite of all these positive steps taken by the State Party, there are a few others which need to be taken into account. First, the State Party should try to complete the boundary wall in time. Despite of the lack of funds, it should find ways and means, and expedite its efforts to arrange the funds for the remaining works. The timely completion of the boundary wall will save the historic monuments from vandalism. The recently reported vandalism of a stone-carved grave in the Samma cluster is one example which occurred due to the lack of a boundary wall because anybody could enter the Makli premises. Moreover, the height of the wall should be higher than the 6 to 7 feet so that nobody can surmount it easily. If the State party can allocate more funds, then it should also protect the wall with barbed wire to completely make the vandalizers' entry impossible.

The State Party should also highlight the importance of the group of monuments near the tomb of Isa Langoti because these monuments are of historic significance. The stone canopies and hermitage of Isa Langoti should be protected from environmental threats and vandalism. During the festivals of Ali Shirazi, Murad Shirazi and Isa Langoti, pilgrims damage historic monuments. Although these lie outside of the boundary wall they can be made part of it due to their historic importance. As already discussed, the Makli monitoring committee constituted by the State Party has stopped all the festivals which lie within the boundary/ protection wall. Likewise, the monuments on the southern Makli ridge should also be protected by highlighting their importance in their report which will be submitted to the World Heritage Committee.

Finally, the most important thing is to increase the capacity-building of technical staff as their majority is not well equipped with modern conservation techniques. Short courses may be useful to understand the initial conservation of the majority of crumbling stone-carved platforms. The majority of these stone-carved platforms lie in crumbling condition (Figs. 3 & 4). These stone carved platforms are mainly concentrated in the Arghuns and Tarkhan clusters on the Makli Hill.



Fig. 3: Dilapidated stone-carved platform on Makli Hill.

Photo: Zulfiqar Ali Kalhoro



Fig. 4: Vandalized stone-carved grave.

Photo: Zulfiqar Ali Kalhoro

Efforts should also be made by the State Party to rebuild the two collapsed stone canopies in the Samma cluster on Makli Hill whose architectural elements are lying on the site. Sooner or later, they will get more damaged. Finally it is suggested that the local community should be involved in the preservation and protection of the Makli Hill monuments because without their help and support this activity is not going to be sustainable.

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Annex

The Authors

Emilija Apostolova Chalovska

Emilija Apostolova Chalovska, MSci (Skopje, 1982) is an architect, working as an assistant-researcher of architecture at the University “Ss. Cyril and Methodius”, Skopje, Republic of Macedonia. The foremost expert for cultural heritage at Citizen Initiative Ohrid SOS, she finished her Masters in Conservation of Architectural Heritage at the Superior Technical School of Architecture, Polytechnic University of Valencia (Spain) in 2014 and is currently working on her PhD thesis



at the same university. In addition to her research work, since 2015 she has participated in teaching activities at the Faculty of Architecture in Skopje in the area of Documentation, Conservation and Revitalization of Architectural Heritage. She is a member of ICOMOS and other professional organizations regarding cultural heritage, which constitutes her primary area of professional interest.

Contact: apostolova_ema@yahoo.com

Ercan Ayboğa

Ercan Ayboğa (43) grew up in Germany as a child of Kurdish-Alevi migrant workers 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.



Contact: e.ayboga@gmx.net

Noni Austin

Noni Austin is a staff attorney in the International Program of Earthjustice. Previously, she practiced environmental, planning and native title law at Herbert Smith Freehills in Sydney, Australia, and clerked for a judge of the Land and Environment Court of New South Wales, Australia. She earned a Masters of



Environmental and Natural Resources Law at the University of Oregon, during which time she externed for the Western Environmental Law Center and Environmental Law Alliance Worldwide.

Contact: naustin@earthjustice.org

Ali Bashash Alanagh

Ali Bashash Alanagh is a civil engineer and a member of the Alborz Construction Building Organization – Alborz Province in Iran. He holds an M.Sc. (Master of Science) in hydraulic structures. He was a member of Young Researchers Club for 8 years. He is holding five patents and is a top Researcher in the Alborz Province Engineering Society. He was working in Bonyad Maskan (The Iranian National Housing Organization), which is responsible for reconstruction and retrofitting damaged buildings, for about five years. He had been working in Bam when in 2003 the earthquake seriously affected Bam and its cultural landscape. His eagerness about retrofitting and conserving World Heritage sites emerged after that bitter event. Today, he tries to increase his students' awareness about WH sites.

Contact: alibashhash2000@yahoo.com



Mohamed Athman Bakar

Mohamed Athman Bakar is Chair of LAWASCO, the water department for Lamu County, and active in Save Lamu. Lamu residents, including fishermen, farmers, artisans, traditional communities, landless peasants, pastoralists, and diverse indigenous groups including the Bajuni, Orma, Sanye, Aweer, and Swahili, are objecting to irresponsible industrialization in the wider setting of Lamu Old Town. Save Lamu is a decade-old coalition of 40 civil society organizations focused on environment, youth, development, women and welfare. Save Lamu is composed of community-based indigenous organizations who are or will be affected by LAPSSSET, including Lamu Coal Plant. The coalition engages communities and stakeholders to ensure participatory decision-making, achieve sustainable and responsible development, and preserve the environmental, social, and cultural integrity of Lamu.

Contact: mohamedathman64@gmail.com



Lamees A. BenSaad

Dr. Lamees A. BenSaad is an assistant professor at Tripoli University. Upon completion of her PhD studies and returning to



Libya, she found life in a war torn society. A society which is neither inclusive nor safe. therefore she decided to contribute with the knowledge and experience she gained throughout the years. She co-founded the Libyan NGO Tripolitanian Society. The Tripolitanian Society aims to raise awareness about culture, protection of heritage,

promote peace, security, social development and influence the national policies. At the Tripolitanian Society she is the head of the culture and heritage committee. She is also a member of the International Society for Sustainable Development.

Contact: lameesbensaad@gmail.com

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.

Contact: vbozgo@gmail.com



Jo-Anne Bragg

Jo Bragg is the CEO and a solicitor at EDO QLD, a not-for-profit independent community legal centre providing advice, support, and representation to individuals and community groups fighting to protect our natural environment. Environmental Defenders Office (Qld) Inc has been active for almost 30 years, providing community legal education and working vigorously for law reform to promote better environmental outcomes.

Contact: jbragg@edoqld.org.au



Fiona Campbell



Fiona Campbell is a teacher and an environmental campaigner. She set up a campaign page on Facebook called Zip Off. The aim of the campaign was to fight against the proposal to site zip wires at Thirlmere in the heart of the Lake District National Park. She writes articles on conservation and landscape and is a member of a group called Extinction Rebellion.

its_fiona2004@yahoo.co.uk

Jon Derry

Jon Derry is a resident of the village of Thornthwaite, within the proposed Keswick and Borrowdale Showcase area and close to the site of the proposed Gondola Base Station. He is a self-employed Sales & Marketing Consultant. Following a public meeting given by Richard Leafe CEO of LDNPA, he was asked by the village to lead a group to campaign against the planned gondola. This group is called No Go Gondola and works closely with other groups who are concerned with the current behaviour of the LDNPA and have come together as Lakes Watch for the purposes of this paper.

Contact: jon.derry@outlook.com



Wiwik Dharmiasih

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 Yayasan Sawah Bali, an NGO based in Bali.

Contact: wiwikd@gmail.com

Sukhgerel Dugersuren

Sukhgerel Dugersuren is the Chair of Oyu Tolgoi Watch, a Mongolian NGO monitoring compliance of Rio Tinto's copper-gold mine and other IFIs financed mines with international environmental and human rights standards. She is also Mongolia Coordinator of Rivers without Boundaries International Coalition (RwB). She is engaging with the multilateral development banks (MDBs) on human rights and development issues, assisting local communities demand

remedy for violations of rights. As part of her human rights work, she engages with the UN mechanisms, international and national level advocacy, including work on a draft law for the protection of Human Rights Defenders in Mongolia. Sukhgerel has a degree from the Moscow State Institute of International Relations. The longest years of her previous job experience was with the USAID Mongolia program office.

Contact: dsukhgerel@gmail.com

Iuliia Eremenko

Iuliia Eremenko is a Doctoral student at the Chair of Sociology 1 of the University of Bamberg (Germany) and Junior researcher at the Sociological Institute of the Russian Academy of Science. The main focus of her research is identity studies and urban studies. She also has been Head of the Commission on Labor and Employment of the NGO "Youth Board of St. Petersburg" from 2012 - 2014.

Contact: iulliae@gmail.com

Maria Isabel da Trindade Ferro

Maria Ferro is a landscape architect and Associate of the Portuguese Association of Landscape Architects. She has a



degree in Landscape Architecture at the Higher Institute of Agronomy in 2004, and a diploma in Advanced Training in Geographic Information Systems from the Instituto Superior Técnico in 2007. She is working on a Master degree in Sustainable Urbanism and Planning at Universidade Nova of Lisbon. Maria is a landscape architect at the Seixal

City Hall, with experience in designing of municipal public spaces (2009-2015) and landscape special planning (2004-2009). She has been a pioneer in a European program of research and inno-

vation for mitigation and adaptation to Climate Change, and a trainer in an EU-PAANE Program for Co-Management, Conservation, Maintenance and Valuation of Public Patrimony.

Contact: mariaferro@gmail.com

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.



Gloria Galarza Peñaherrera

Born in the city of Latacunga, Gloria Galarza is a universal citizen who has lived in Quito for 30 years. She studied Finance Engineering at the Central University of Ecuador and graduated in Accounting and Audit Engineering from the Metropolitan University of Quito. She is an activist for the Defense of the Historical Center of Quito and member of the Kitu Milenario collective. Galarza co-manages the Facebook pages: Defense of the Historic Center of Quito, Defense of San Francisco Tangible and Intangible Heritage, CSI Arqueología EC and Observatorio Centro Histórico de Quito.

Contact: glogalarza@yahoo.com



Oumaïma Gannouni

Oumaïma Gannouni holds a BA in the Arts, Humanities and Social Thought from Bard College Berlin and an MA in World Heritage Studies from the Brandenburg University of Technology. Oumaïma's studies are a mere exploration of her personal interests. She immersed herself in philosophy, the visual arts, ethics, history and finally trained in World Heritage conventions and their application, conventions on heritage conservation and promotion, and on the inscription, management and enhancement of archaeological UNESCO sites.



She previously worked as a photographer for The Nepali Times, a Research Assistant and is currently consulting a German start-up operating in the MENA region. Oumaïma grew up in Carthage and takes it upon herself to ensure the survival of the site where her passion for the Liberal Arts initially formed.

Contact: o.gannouni@berlin.bard.edu

Sofia Cristina Mendonça Gaspar

A member of the Portuguese Association of Architects, Sofia has received a Bachelor of Architecture from the University School of



Arts Coimbra in 2003 and a diploma in Advanced Urban Development in Land Management from the Instituto Superior Técnico in 2007, where she is working on a Master Degree in Urban and Territorial Planning. She works as an architect at the Seixal City Hall, with experience in designing public spaces, supervising construction and in public edifications,

elaboration of projects of municipal buildings and monitoring of building constructions (2009-2015). She has been a pioneer in a European program of research and innovation for mitigation and adaptation to Climate Change, and a trainer in an EU-PAANE Program for Co-Management, Conservation, Maintenance and Valuation of Public Patrimony.

Contact: sofiamendoncagaspar80@gmail.com

Green Salvation

The Ecological Society “Green Salvation” was founded in 1990 and is registered as a public organization of the city of Almaty. Green Salvation’s goal is to protect the human right to a healthy and productive life in harmony with nature, and to foster improvements to the socio-ecological situation in the Republic of Kazakhstan. The main Areas of Green Salvation’s activities Include: 1. Defending the Human Right to a Favourable Environment. | 2. Participation in the Development of Environmental Protection Legislation. | 3. Environmental Awareness and Education. 4. Environmental Actions. | 5. Collection of Data on the Environmental Situation in the Republic of Kazakhstan.

Contact: gsalmaty@gmail.com

Fritz Groothues



Fritz Groothues is a retired journalist and head of strategy at the BBC World Service. He has been campaigning against non-essential motor vehicles on the tracks near Little Langdale since 2005.

Contact: fritzgroothues@yahoo.com

Musa Oluwaseyi Hambolu

Dr. Musa Oluwaseyi Hambolu is an archaeologist and presently teaches in the Department of Archaeology and Heritage Studies at the University of Jos, 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.



Contact: seyibolu@yahoo.com

International Campaign for Tibet

The International Campaign for Tibet (ICT) works to promote human rights and democratic freedoms for the people of Tibet. ICT monitors and reports on human rights, environmental and socio economic conditions in Tibet; advocates for Tibetans imprisoned for their political or religious beliefs; works with governments to develop policies and programs to help Tibetans; secures humanitarian and development assistance for Tibetans; works with Chinese institutions and individuals to build understanding and trust, and explores relationships between Tibetans and Chinese, mobilizes individuals and the international community to take action on behalf of Tibetans; and promotes self-determination for the Tibetan people through negotiations between the Chinese government and the Dalai Lama. Founded in 1988, ICT maintains offices in Washington, DC, Amsterdam, Berlin, Brussels and Dharamsala, India.

Contact: kai.mueller@savetibet.de

Zulfiqar Ali Kalhoro

Dr. Zulfiqar Ali Kalhoro (1977), 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 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.

Contact: zulfio4@hotmail.com

Sultana Kamal

Sultana Kamal is the Convener of the National Committee for Saving the Sundarbans (NCSS), a coalition of more than 50 civil



society and non-governmental organizations of Bangladesh having shared interest in the environment, is concerned that the Government of Bangladesh continues to disregard the 2017 decision of the World Heritage Committee (WHC) 41COM 7B.25 to protect the outstanding universal values (OUV) of the Sundarbans Bangladesh World

Heritage site.

Contact: bapa2000@gmail.com

Wilson Kipsang Kipkazi

Wilson Kipsang Kipkazi is a professional banker who turned human rights defender. Before joining the Endorois Welfare Council, he had worked for the Kenya Commercial Bank for 12 years, and 2 years for Kenya Accountants and Secretaries Board. He has worked as Programs coordinator in 2003, and Executive Director since 2011. He has been among the lead representatives of the Endorois during the litigation of the Endorois case at the African Commission in 2010. He holds a BA in community development and resource mobilization and underwent courses on Human Rights and Business at the University of Pretoria, Community Legal Empowerment at the Central European University, Hungary, and on the Nagoya Protocol, a framework for Access and Benefit Sharing Arrangements for Indigenous and Local Communities. He is a community lead person on UNESCO World Heritage.

Contact: kipkaziwk@gmail.com



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 man-



agement 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.

Contact: mikhail.kreindlin@greenpeace.org

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 specialty, 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.

Contact: geoff.law144@gmail.com

Katharine Lu

Katharine Lu is the Senior Sustainable Finance Manager at Friends of the Earth US. She leads the organization's research on new



models of sustainable finance and development, primarily those from China and other emerging markets. In particular, she is an expert on the development and impacts of Chinese overseas investments and assesses the operationalization of China's green finance policies on a project level. Her research has been referenced in the Financial Times, South

China Morning Post, Guardian, The New York Times, and other publications. She received a B.A. from University of California, Davis and M.A. in Humanities and Social Thought at New York University. She has worked in the private and non-profit sectors, including Google and Johns Hopkins University, among others.

Contact: klu@foe.org

Andrea Martínez Fernández

Andrea Martinez (1995) is currently studying a Master's in World Heritage Studies in BTU Cottbus-Senftenberg. Originally from

Spain, she completed her Bachelor's in Archaeology in Complutense University in Madrid in 2017, but has also a background in Cultural Anthropology. She was granted with an ERASMUS scholarship to attend the Albert-Ludwigs-Universität Freiburg, where she focused her studies on cinema and commun-



ication. She has followed the path of heritage and community engagement not only at university, but also with the undertaking of several internships, not only in her home country, but also in France, Mexico and Cuba. During the summer of 2018 she was granted with a DAAD scholarship to attend Helwan University in Cairo, helping her specializing on heritage and conflict, which she hopes can help her resolve community conflicts in the future.

Contact: andreamf9@hotmail.com

Louise Matthiesson

Louise Matthiesson is Director of the Queensland Conservation Council has been involved in environmental and climate campaigns for around 20 years, working for a range of community groups in Victoria and Queensland. Most recently she was the Queensland Campaigner for Solar Citizens and prior to that played a lead role in the Fight for the Reef campaign against new coal mines in the Galilee Basin and port expansions along the Great Barrier Reef Coast. Louise has also worked as a journalist for ABC radio and a science communicator with the CSIRO.

Contact: director@qldconservation.org.au

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.

Contact: ark.kreshnik@gmail.com

Mikisew Cree First Nation

The Mikisew Cree First Nation is an indigenous nation in Canada whose lands and rights depend on the Peace-Athabasca Delta in Wood Buffalo National Park and surrounding waters. The Mikisew Cree signed Treaty 8 in 1899 at Fort Chipewyan on Lake Athabasca. Today, Mikisew members reside in Fort Chipewyan as well as Fort McMurray, Edmonton, Fort Smith, NWT, and elsewhere. The Mikisew Cree filed a petition with the World Heritage Committee in 2014 for the Wood Buffalo National Park World Heritage Site to be inscribed on the List of World Heritage in Danger as a result of threats to the Park from upstream hydro-power and oil sands projects and climate change.

Contact: [Contact: melody-lepine@mcfnir.ca](mailto:melody-lepine@mcfnir.ca)

Elena Minchenok

Elena Minchenok, born in St Petersburg (Leningrad) in 1983, 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 2000s 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 and author of a bilingual

book "Saint Petersburg: Heritage at Risk", a project that involved an international team of contributing authors. She has led 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.

Contact: e.minchenok@gmail.com

Hartmut Müller



Hartmut Müller was born 1945 in Meiningen/Thuringia, Germany. From 1965 to 1972 he studied biology at the University of Greifswald where he also received his PhD. Hartmut has a lifetime interest and professional commitment in nature conservation, and is a specialist in ornithology. He was in charge of setting up the Lower Oder National Park

in Brandenburg/ Germany and became its founding director from

1994 to 1996. Since 2002 he worked in nature conservation and was the director of the Shirvan National Park in Azerbaijan. In addition, he had long-term expert missions in nature conservation in Poland, Ukraine, Albania and again Azerbaijan. Presently he is an expert with the Michael Succow Foundation for the Protection of Nature. Hartmut is an enthusiast in bird photography and author of numerous books.

Contact: hartmut.e.j.mueller@gmx.de

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.

Contact: tangla8@gmail.com

Ghazal Nouri



Ghazal Nouri is an architect with an M.A. degree in Restoration and Revitalization of Historic and Urban Buildings, and Ph.D. in Archaeology. She is a member of the Young Researchers Club and the International Tour Guiding of Cultural Heritage, Handicrafts and Tourism Organization of Iran, and works as an international tour leader, specifically in educational tourism in World Heritage sites to increase both young tourists and students' awareness about WH sites.

Moreover, she is a member of Tehran Construction Building Organization. She has been teaching as an invited teacher at Islamic Azad University and PNU branches since 2005 till now. She has been working online with the geography and history department of Complutense University of Madrid (UCM) from 2016-2018 on Iran's World Heritage in Danger. Her research focuses on educational and archaeological tourism.

Contact: sahand.igv@gmail.com

Aurora Pețan

Aurora Pețan is a researcher at the Study Centre of Dacica Foundation (Alun, Romania). She has a PhD in Philology and another one in History. Her main fields of interest are Dacian history, civilization and cultural heritage. Since 2009 she has been the President of the Dacica Foundation, an NGO whose purpose is to research and promote the cultural heritage of the Dacian period and whose headquarters are in the area of the Dacian Fortresses of Orăştie Mountains. Her recent book "Sarmizegetusa Regia – The Rediscovery of the Fortress" (2018) is the most extensive work dedicated to this monument published in the last decades.

Contact: aurora.petan@dacica.ro



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.

Contact: proctorgerry@hotmail.com



Herbert Rasinger

Herbert Rasinger has been the chairman of the Cityscape Protection Initiative (Initiative Stadtbildschutz), based in Vienna, Austria since 2015. He is active in cultural heritage site (last atelier of Gustav Klimt) and city protection matters (Wien Mitte, Vienna ice skating ring). He is a graduate of the Vienna Technical University and of a high school in Wilmington, Delaware, USA.



Contact: i-stadtbildschutz@aktion21.at

Gianluigi Salvador

Gianluigi Salvador (1942) studied statistics and demographics at the University of Padua and Rome. He worked for thirty years as



a company inspector at IBM Italy on IT projects and quality management systems. He was a trade union delegate in the company and a municipal councilor in Carnate (Milan) for the Green Party from 1990 to 1994. He was also at the same time in the Federal Council of the Greens of Lombardy. From 2002 to 2012 he was regional councilor of the WWF

for energy and waste, and participated in the drafting of the national waste position of WWF Italy. In 2007 he participated in the foundation of the Movimento della Decrescita Felice (MDF), a movement inspired by Maurizio Pallante. Since 2014 he has been on the board of PAN Italia (Pesticide Action Network) with activities to stop the devastation caused by synthetic pesticides in monoculture vineyards in Veneto.

Contact: gianlu.cali@libero.it

Daniel Scarry

Following volunteer experience in the Republic of Macedonia in 2005/6, Daniel Scarry became engaged with Ohrid SOS, a local



citizen initiative devoted to the meaningful protection of Macedonia's UNESCO Ohrid region, nearly four years ago after proposals were announced to drain the vital Studenchishte Marsh wetland and impose large-scale tourism infrastructure upon the site. Fascinated by habitats, biodiversity and the interplay between them, he has co-authored two journal papers and several reports/articles related to

socio-ecology, wetland protection and natural heritage conservation in Macedonia.

Contact: dscar.ohridsos@gmail.com

Christian Schuhböck

Christian Schuhböck (*1962) founded the "Alliance For Nature", an organisation for the protection of natural and cultural sites while a student, and has been its Secretary General ever since. In 1988/89, he organised the initiative "Rettet das Dorfertal" in order to preserve the Eastern Alps from the construction of a very large storage power station and at the same time enable the creation of the Hohe Tauern National



Park. For this he was awarded with the Austrian State Prize for the Protection of the Environment. Since 1990, Mr. Schuhböck has been working in the context of the UNESCO World Heritage Convention, and he has substantially contributed to Austria's compliance with this Convention. He played leading roles in the inscription of the Semmeringbahn and its landscape (1998), the Wachau (2000), and the Swiss Alps Jungfrau-Aletsch (2001) in the World Heritage List.

Contact: office@alliancefornature.at

Eman Shokry Hesham

Eman Shokry Hesham is an Egyptian architect and a doctorate student at Brandenburg University of Technology BTU Cottbus-



Senftenberg in Germany. Currently she studies and conducts research on the topics Heritage Management and Social Impact in the Heritage Sites. The current case study which Hesham is concerned about in her Doctoral thesis is Luxor city in Egypt, in which part of the WHS "Ancient Thebes with its Necropolis" is located. However, Hesham is generally

concerned about heritage conservation and site management in Egypt.

Contact: imanshokry@gmail.com

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 Eurasian transboundary rivers. He collaborated with the WWF Amur Program to curtail three hydropower projects and designed a methodology for basin-wide environmental impact assessments of hydropower and analysis of the role

of hydropower in flood management. He also works with the trilateral "Dauria" International Protected Area and the Sino-Russian Expert Committee on Biodiversity and Protected Areas. Since 2012, RwB has campaigned on hydropower projects sponsored by the World Bank and China Exim Bank. Since 2016 Eugene has worked with the Green Silk Road Coalition that pushes for more accountability and environmental sustainability of China's Silk Road Economic Belt integration initiative.

Contact: esimonovster@gmail.com

Brendan Sydes

Brendan Sydes is CEO and Lawyer at Environmental Justice Australia (EJA), a not-for-profit legal practice dedicated to justice for people and the planet. Under Brendan's leadership, EJA has grown to become an effective force for change, contributing legal and strategic expertise to the environment movement and grassroots campaigns on issues ranging from air pollution to nature conservation and corporate accountability.

Contact: brendan.sydes@envirojustice.org.au



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.



Contact: klaus-thomas@web.de

Imrana Tiwana

After graduating from the National College of Arts, Lahore, Imrana Tiwana went to the 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 Malaysian urban 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, recruit-



ing many of her colleagues to the cause. She is an architect by profession but an environmentalist at heart.

Contact: itiwana@yahoo.com

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.

Contact: gunterwippel@aol.com

Imogen Zethoven

Imogen Zethoven is the Director of Strategy at the Australian Marine Conservation Society (AMCS) and former Director of AMCS's Great Barrier Reef (GBR) campaign. Imogen has worked for a number of NGOs including The Pew Charitable Trusts in Australia and the United States and WWF in Australia and Germany. Her work has covered establishing marine reserves, fisheries management, threatened species conservation and climate change. In recognition of her work, Imogen received the Fred M. Packard International Parks Merit Award at the World Conservation Congress in 2004 and was made an Officer of the Order of Australia (AO) for service to conservation and the environment. From 1992 to 1994 she was environment advisor to the leader of the Australian Democrats. Imogen has a Masters of Environmental Studies from the University of Adelaide.

Contact: imogenzethoven@amcs.org.au





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